



RSPO P&C CERTIFICATION AUDIT REPORT

AGRIPALMA LDA

Audit Application Number:	PC26-000051
Assessment Type:	Annual Surveillance Audit 4
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1. Certification Body Background

1.1 Description of Certification Body

Certification Body Information	
Name of Certification Body	SCS Global Services
Address of Certification Body (Accredited Office)	2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA
Background of the Certification Body	SCS Global Services (SCS) is a global leader in third-party environmental and sustainability certification, auditing, testing services, and standards. Established as an independent third-party certification firm in 1984, our goal is to recognize the highest levels of performance in environmental protection and social responsibility in the private and public sectors, and to stimulate continuous improvement in sustainable development. SCS became one of the first recognized California Benefit Corporations. SCS holds itself to the highest standards in the industry and has been accredited by six different accreditation bodies covering over 15 different certification systems, including food and agriculture, forestry, greenhouse gas, indoor air quality, sustainable furniture and biofuels. SCS was approved as a RSPO certification body for supply chain certification (worldwide) on 13 January 2017. Most recently approved for Principles & Criteria scope (worldwide) 13 November 2018.
Phone Number (Accredited Office)	+1.510.452.8000
Websites	www.SCSglobalServices.com
Contact Person Name	Adriana Cala, RSPO Program Manager
Email	acala@scsglobalservices.com
Accreditation Information	
ASI Code	ASI-APP-002
Technical Scope	RSPO Principles & Criteria and RSPO Supply Chain
Geographical Scope	Worldwide
Accredited Since	12 Jan 2017



2. Organisation Details and Certification Scope

2.1. Organisational Overview

Management Unit Information <i>Note: Management Unit refers to unit of certification</i>	
Name of Management Unit/s	AGRIPALMA LDA
Address of the Management Unit/s	Street Ribeira Peixe, 953, City: Ribeira Peixe, State: Caué.
Country	São Tomé and Príncipe
Websites	https://www.socfin.com/en/locations/agripalma
Description of the Management Unit	<p>Following the redefinition of its agricultural policy in May 2008, the government of São Tomé aimed to attract investors to agricultural projects on the island. On March 4, 2009, a Memorandum of Understanding (MoU) was signed (in French), titled “Protocole d’accord entre le Gouvernement ayant pour objet le Projet de Développement régional intégré agro-industriel de la zone sud de São Tomé et de Príncipe”. This agreement established the Agripalma project, with management initially controlled by STP-Invest, a Belgian company. The project’s goal was to replant 665 hectares (ha) from the previous government initiative, EMOLVE, and to cultivate additional designated areas. At its inception, Agripalma was 88% owned by STP-Invest and 12% by the São Tomé Government. On October 23, 2013, Socfinco, a subsidiary of Socfin, acquired STP-Invest’s 88% stake.</p> <p>Currently, Agripalma has replanted 646 ha and planted an additional 1,441 ha, totaling 2,100 ha of oil palm across two plantations: the main site in Ribeira Peixe and the southern plantation near Porto Alegre. The total concession area is now 2,387.6 ha, comprised of Titulo 409 (652.6 ha) and Titulo 410 (1,735 ha). After a Free, Prior, and Informed Consent (FPIC) process, Agripalma returned some areas to the government, as it has no plans for further expansion. The plantation is located approximately 55 km south of the city of São Tomé, in the Caué District, along EN No. 2 towards Porto Alegre.</p> <p>Agripalma operates a 10-ton/hour mill that processes Fresh Fruit Bunches (FFB) exclusively from its own plantations, with no inclusion of smallholders. The company produces only palm oil and palm kernel.</p> <p>Agripalma has established and maintains strong relationships with neighboring communities through structured systems, procedures, and regular engagement. The company categorizes these communities as:</p> <ul style="list-style-type: none"> •Riparian Villages: Two villages within the concession (Emolve and Vila Clotilde) that accommodate workers and their families.



	<p>•Neighboring villages: Eight villages outside the concession but within the Area of Interest (Aol).</p> <p>The economy of the Aol is primarily driven by agriculture—especially the Agripalma plantation—and fishing. In plantation villages, the economy relies on salaried workers, while neighboring villages engage in subsistence agriculture, cash crops, and commercial fishing. Agripalma employs 969 workers, of whom 508 reside within the concession, and 461 live outside it. The company is the largest employer on São Tomé Island, with neighboring communities including Io Grande, Dona Augusta, Ribeira Peixe, Praia Pesqueira, Monte Mario, Malanza, Ponte Baleia, and Porto Alegre.</p> <p>Agripalma also maintains relationships with key stakeholders, such as government agencies, non-governmental organizations, and service providers. The company achieved EU Organic Standard Production and Global GAP certifications for its palm fruit and palm oil production in December 2017. Additionally, it obtained the IPAC Agricert Organic Standard Vs0407/2019.</p> <p>Today, Agripalma's plantation is fully mature, with harvesting and processing operations having commenced in September 2019. Agripalma obtained EU Organic Standard Production and Global GAP certification of its palm fruit and palm oil production in December 2017 and the IPAC Agricert Organic Standard Vs0407/2019.</p>
Management Representative Name	Cynthia Van-Dunem
Management Representative Designation	Sustainability Manager
Management Representative Email	cvandunem@agripalmastp.com

2.2.RSPO Membership Information

RSPO Membership Information	
RSPO Membership No.	1-0269-19-000-00
Name of RSPO Member	SOCFIN SA
Member Since	06-12-2004



2.3. Certificate Information

Certificate Information	
Certificate No.	SCS-RSPOPC-000247
prisma Document Reference Number	N/A
prisma Trading Account ID	TA25-017140
Scope of Certification	This certificate covers the production of CSPO using the Identity Preserved supply chain model.
Supply Chain Model	<input checked="" type="checkbox"/> Identity Preserved (IP) <input type="checkbox"/> Mass Balance (MB)
Applicable Standards / Normative Reference	<input checked="" type="checkbox"/> RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 <input checked="" type="checkbox"/> RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard 2020 <input type="checkbox"/> RSPO Management System Requirements for Group Certification of FFB Production 2022 <input checked="" type="checkbox"/> RSPO Rules on Market Communication and Claims 2022
National Interpretation (NI)	Not Applicable
Initial Date of Certification:	26 10 2021
Effective Date of Certificate:	26 10 2021
Expiry Date of Certificate:	25 10 2026
Name of Peer Reviewer	N/A

3. Description of the Management Unit

Information of Palm Oil Mill					
Name of Palm Oil Mills	prisma Site Business ID	Address of Palm Oil Mill	Mill's capacity (MT/hour)	GPS Coordinates	
				Latitude	Longitude
Agripalma	ML25-001443	Ribeira Peixe, 953, Ribeira Peixe, Caué, Sao Tome And Principe	10	0.1074	6.6033
Remarks: N/A.					

Information of Supply Bases					
Name of Supply Bases	prisma Supply Base ID	Address of Supply Bases	Type of Supply Bases	GPS Coordinates	
				Latitude	Longitude
AGRIPALMA (TITLE 409)	SB25-003606	Ribeira Peixe. Caué	Own/Managed Estate	0.108783	6.5978
AGRIPALMA (TITLE 410)	SB25-003607	Ribeira Peixe. Caué	Own/Managed Estate	0.097483	6.58



3.1. Area Statement of the Management Unit

Area Statement of Supply Bases									
Name of Supply Base	Certified Area (Ha)	Planted Area (Ha)			Unplanted Area (Ha)				
		Oil palm planted on non peatland	Oil Palm Planted on Peat	Other Crop(s)	HCV	HCS	HCV-HCS	Conservation	Facilities / Others
AGRIPALMA TITLE 409	652.6	650.58	0	0	2.02	0	0	0	0
AGRIPALMA TITLE 410	1,735.3	1,383.55	0	0	351.75	0	0	0	0
TOTAL	2,387.9	2,034.13	0	0	353.77	0	0	0	0
Remarks: N/A.									



3.2. Age Profile of the Management Unit

Name of the Supply Base	Land size (Ha) by age of the Oil Palm				Production Area (Ha)	Total Planted Area (Ha)
	0 - 3 Phase 1	4-6 Phase 2	7-18 Phase 3	≥19 Phase 4		
AGRIPALMA TITLE 409	0	2	650.58	0	650.58	650.58
AGRIPALMA TITLE 410	0	2	1,383.55	0	1,383.55	1,383.55
TOTAL (ha)	0	4	2,034.13	0	2,034.13	2,034.13
Remarks: N/A.						

Notes: This age profile range is used based on the common phase of oil palm age as referred in <https://www.researchgate.net/publication/327527812>.



3.3.Replanting Programme of the Management Unit (5 Years) – Not applicable

Name of the Supply Base	Land area (ha) by year					Total Area (Ha)
	20xx (current year)	20xy (current year+ 1)	20xz (current year+ 2)	20xa (current year+ 3)	20xb (current year+ 4)	
There was no replanting	-	-	-	-	-	-
TOTAL (ha)	-	-	-	-	-	-

Notes: 1st year of the replanting programme will be the current year of the audit



3.4. Name FFB Supplier Supplying FFB to the Mill (Certified FFB)

Name of other FFB Suppliers	Type of FFB Suppliers	GPS Coordinates		FFB received by the mil (MT) <i>*During the current license period</i>
		Latitude	Longitude	
AGRIPALMA TITLE 409	Own supply bases	0.108783	6.5978	6,754
AGRIPALMA TITLE 410	Own supply bases	0.097483	6.58	14,353
TOTAL				21,107



3.5 Name FFB Supplier Supplying FFB to the Mill (Un-Certified FFB)

Name of other FFB Suppliers	Type of FFB Suppliers	GPS Coordinates		FFB received by the mil (MT) <i>*During the current license period</i>
		Latitude	Longitude	
Not applicable	choose an item	-	-	-
TOTAL				-



3.6 Projected Certified Volume for Next License.

Information of New License		
Next License Period	Start Date	26/01/2026
	End Date	25/10/2026
Projected Certified FFB Volume (MT)	23,500	
Average Production Yield (MT/ Ha)	11.5	
Projected CSPO Certified Volume (MT)	Identity Preserved	5,522
	Mass Balance	0
Projected CSPK Certified Volume (MT)	Identity Preserved	940
	Mass Balance	0
Oil Extraction Rate (OER) (%)	23.5%	
Kernel Extraction Rate (KER) (%)	4.0%	



3.7 Information of Previous & Current License (Identity Preserved)

Name of Palm Oil Mill	Agripalma			
Information of License	Previous Year License		Current Year License	
License Period	Start Date	26/10/2023	Start Date	26/10/2024
	End Date	25/10/2024	End Date	25/10/2025
Actual Production Period Reported	From	01/08/2023	From	01/08/2024
	To	31/07/2024	To	31/07/2025
Projected FFB Certified Volume (MT)	24,000		23,150	
Actual production of FFB (MT)	21,213		21,107	
Projected CSPO Certified Volume (MT)	5,640		5,440.25	
Actual CSPO Production Volume (MT)	4,690		4,741	
Actual CSPO Volume Sold as RSPO Certified (MT)	519.38		3,543.32	
Actual CSPO Volume Sold as Conventional (MT)	0		0	
Actual CSPO Volume Sold under Other Scheme (MT)	3,294.80		0	
Total Actual CSPO Volume Sold (MT)	3,814.18		3,543.32	
Actual CSPO credits sold (where applicable)	0		0	
Projected CSPK Certified Volume (MT)	960.0		926	
Actual CSPK Production Volume (MT)	593.38		1,220*	
Actual CSPK Volume Sold as RSPO Certified (MT)	0		0	
Actual CSPK Volume Sold as Conventional (MT)	0		0	
Actual CSPK Volume Sold under Other Scheme (MT)	0		0	
Total Actual CSPK Volume Sold (MT)	0		0	

* The difference is due to a final Kernel Extraction Rate (KER) (%) in recent months, close to the end of the evaluation period.



3.8 Information of Previous & Current License (Mass Balance)

Not applicable

Name of Palm Oil Mill				
Information of License	Previous Year License		Current Year License	
License Period	Start Date	DD Mmm YYYY	Start Date	DD Mmm YYYY
	End Date	DD Mmm YYYY	End Date	DD Mmm YYYY
Actual Production Period Reported	From	DD Mmm YYYY	From	DD Mmm YYYY
	To	DD Mmm YYYY	To	DD Mmm YYYY
Projected FFB Certified Volume (MT)	-		-	
Actual production of FFB (MT)	-		-	
Projected CSPO Certified Volume (MT)	-		-	
Actual CSPO Production Volume (MT)	-		-	
Actual CSPO Volume Sold as RSPO Certified (MT)	-		-	
Actual CSPO Volume Sold as Conventional (MT)	-		-	
Actual CSPO Volume Sold under Other Scheme (MT)	-		-	
Total Actual CSPO Volume Sold (MT)	-		-	
Actual CSPO credits sold (where applicable) (MT)	-		-	



Projected CSPK Certified Volume (MT)	-	-
Actual CSPK Production (MT)	-	-
Actual CSPK Volume Sold as RSPO Certified (MT)	-	-
Actual CSPK Volume Sold as Conventional (MT)	-	-
Actual CSPK Volume Sold under Other Scheme (MT)	-	-
Total Actual CSPK Volume Sold (MT)	-	-



4. Audit Programme

4.1. Audit Methodology

SCS Global Services (SCS) deploys interdisciplinary teams with expertise in agro-forestry, social sciences, natural resource, environmental management, economics, palm oil production, and other relevant fields to assess the conformance of **AGRIPALMA LDA** to the RSPO Principles and Criteria Generic RSPO Certification Systems document and **AGRIPALMA LDA** documented policies/procedures.

To ensure compliance, the audit treated the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the sampled estate(s). Evaluation methods included review of documents and records, observation of implementation of SOPs and policies in the field, gathering information from **AGRIPALMA LDA** personnel, contractors, and stakeholders (internal and external). The audit team used RSPO sampling methodology to select operational sites to visit and stakeholders to engage. As such, the assessment is based on random sampling and therefore nonconformities may exist that have not been identified.

Each audit team member evaluated parts of the standards based on her or his background and expertise. On the final day of the evaluation, team members convened to deliberate the findings of the assessment jointly. This involved an analysis of all relevant field observations, interviews, stakeholder comments, as well as documents and records. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence, or differences of interpretation of the standards, the team reported these in the certification decision section and/or in observations.

The final summary of the assessment findings can be found in item 6 “Summary of Audit Findings”.

For Initial and Re-certification assessment, the report is externally reviewed by ASI approved Peer Reviewer prior to certification decision by SCS.

For Annual surveillance assessment, the report is internally reviewed and approved by SCS qualified certification reviewer.

For any COVID-19 measures put in place before, during and after the audit please visit: <https://www.scsglobalservices.com/news/covid-19-letter-to-our-clients-colleagues-and-friends>

4.2. Audit Team Member

Name	Role	CAB Auditor Number
Dina Maria Medem Cortés	Lead auditor	ASI1DTYEJK
Laura Reyes	Team member	ASI1YTSB5L
Frank Kwesi	Team member	ASI1RQ7RYS
Jony Jordão da Cruz	Local expert/ Translator	-
Romilson Silveira	Translator	-



4.3. Audit Plan

DATE	TIME	CAB AUDITOR NUMBER	LOCATION	ACTIVITIES
Day 1 : Opening meeting and documentary review				
	6:30 am	DM - ASI1DTYEJK LR- ASI1YTSB5L	Hotel	Breakfast and travel from town to Agripalma’s Mill office.
	8:00 am	FK- ASI1RQ7RYS JC- Jony Jordão da Cruz RS- Romilson Silveira	Oil mil Office	Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to P&C RSPO standard and protocols.
	8:40 am – 12:00 pm 13:00 h – 17:00h	LR- ASI1YTSB5L JC	Oil mil office	<p>Supply Chain- Mill IP Module / H&S Site Walk-through: ⇒ Observe production process, weighbridge, storage facilities and critical control points, workersinterview. ⇒ H&S</p> <p>Document review Indicators : 3.7.3, 3.8, 3.2.2</p> <p>Quality management system review</p> <ul style="list-style-type: none"> ▪ Demonstration of legal entity ▪ Roles and responsibility ▪ Procedures/manual/SOP ▪ Record of purchase – FFB ▪ Record of sales – CPO ▪ Prisma transactions ▪ Estimated tonnage ▪ ERP system ▪ Records of Goods In and Goods out
		DM - ASI1DTYEJK	Oil mil office	<ul style="list-style-type: none"> ▪ Previous audit NC’s closure (ASA 3) ▪ Time Bound Plan Indicators: 1.1, 1.2, 2.1.1, 3.1.3



August 25, 2025	8:40 am – 12:00 pm			Ethical and Transparent Behaviour <ul style="list-style-type: none"> ■ Consultation and communication procedure ■ Public availability of information ■ Updated list of stakeholders ■ Ethics Policy Management Review <ul style="list-style-type: none"> ■ (Internal audit P&C) 	
	13.00 h – 17:00 h			ESIA - Social review Indicators: 3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3 <ul style="list-style-type: none"> ■ Social impact assesment ■ Action plan for continuous improvement ■ Social monitoring and management plan Monitoring and follow up mechanism Records 	
August 25, 2025	8:40 – 15:00h	FK- ASI1RQ7RYS	Oil mill office	Agronomic Documentary review of procedures Indicators : 3.1.2, 2.1.1, 3.3.1, 3.3.2, 3.3.3, 7.1, 7.2, 7.4, 7.5, 7.6, 7.7 <ul style="list-style-type: none"> ■ Renewal programme projected for at least 5 years ■ IMP ■ Good Agricultural Practices ■ Soil mangement ■ Use of fire andagrochemical ■ Storages: agrochemical, fertilizers, waste, fuels 	
	15:00h – 17:00h			Environmental – Site Tour. (3,7) <ul style="list-style-type: none"> ■ Environmental Impact Assessment ■ Waste Management ■ Water management ■ Energy Management ■ Mill effluents ■ Workers interview 	
	12:00 pm – 13:00 h			Lunch	
	17:00 h			End of day 1	



Day 2: Document review and farm 409 visit				
Aug 26, 2025	7:30 am - 12:00pm	LR- ASI1YTSB5L JC FK- ASI1RQ7RYS RS	409 Farm	<p>Agronomic, Environmental and H&S - Field visit. Indicators : 2.1.1, 2.1.3, 3.2.1, 3.3, 3.6, 3.7.2, 6.2.4, 6.7, 7.1-7.8, 7.11, 7.12</p> <ul style="list-style-type: none"> ▪ HCV ▪ LUC ▪ EISA – Environmental farms ▪ Remediation and compensation plan ▪ Continuous improvement farms (Environmental) ▪ Worker interview ▪ Housing for workers ▪ Maps ▪ Risk and health management ▪ Identifying workplace hazards ▪ Training records ▪ H&S (Emergency plan, accident register, PPE) ▪ POEs (H&S and environmental) ▪ Plantation water management plan ▪ Worker interview ▪ Boundary check (Coordinate taking and map verification) ▪ IMP ▪ Good Agricultural Practices ▪ Soil Management ▪ Use of fire and agrochemical ▪ Storages: agrochemical, fertilizers ▪ Training records ▪ POEs ▪ Waste management plan ▪ Burning and use of fire
	13:00h - 17:00h	FK- ASI1RQ7RYS RS	Oil mill office	<p>Calculator, fossil fuel use (Oil mil and farms) Indicators : 7.9.1, 7.10</p> <ul style="list-style-type: none"> ▪ Revision of the Palm GHG calculator and related databases ▪ Plan for fossil fuel efficiency improvements



Aug 26, 2025	13:00h - 17:00h	LR- ASI1YTSB5L JC	Oil mill office	<p>Supply Chain- Mill IP Module / H&S</p> <p>Indicators : 3.7.3, 3.8, 3.2.2 Quality management system review</p> <p>:</p> <ul style="list-style-type: none"> ▪ Review of procedures. ▪ Roles, responsibilities. ▪ Review of training plan, records. ▪ Internal audit procedure, and plan including subcontractors, internal audits results. ▪ Management review. ▪ Corrective/preventive actions. ▪ Complaints and their resolution. ▪ Critical control points ▪ Evaluation on market communications and claim ▪ Review of auditor-selected sample of RSPO and/or SCS on-product and/or promotional trademark uses, review of any corporate trademarks on-site or website. Pending traceability. <p>Review of the metric template and its calculation bases.</p>
	7:30 am – 12:00 pm	DM - ASI1DTYEJK	Oil mil office	<p>Respect for the community, human rights and benefit delivery</p> <p>Indicators : 4.1-4.8</p> <ul style="list-style-type: none"> ▪ Complaints and Grievance Mechanism ▪ Respect for Human Rights ▪ Company contribution to communities ▪ Free Prior and Informed Consent (FPIC) ▪ Land use ▪ Land ownership <p>Compensation procedure</p>
	13:00 – 17:00	DM - ASI1DTYEJK	Oil mil office	<p>Start review - Respect for labour rights - Policy review and implementation (Farms and oil mill)</p> <p>Indicators : 6.1, 6.3, 6.4, 6.5, 6.6</p> <ul style="list-style-type: none"> ▪ Freedom of association ▪ Gender Committee ▪ Labour policies ▪ Child Labour ▪ Reproductive Rights



				<ul style="list-style-type: none"> ▪ Complaints Mechanism ▪ Forced Labour
	12:00 pm – 13:00 h	Lunch		
	17:00 h	End of day 2		
Day 3: Document review, stakeholder consultations and 410 farm visit				
	7.30 am	Meeting with Management to share the balance of the 1 and 2 audit days / DM		
Aug 27, 2025	7.30 am – 12.00 pm	LR- ASI1YTSB5L JC FK- ASI1RQ7RYS RS	410 Farm	Agronomic, Environmental and H&S - Field visit Indicators : 2.1.1, 2.1.3, 3.2.1, 3.3, 3.6, 3.7.2, 6.2.4, 6.7, 7.1-7.8, 7.11, 7.12 <ul style="list-style-type: none"> ▪ HCV ▪ LUC ▪ EISA – Environmental farms ▪ Remediation and compensation plan ▪ Continuous improvement farms (Environmental) ▪ Worker interview ▪ Housing for workers ▪ Maps ▪ Risk and health management ▪ Identifying workplace hazards ▪ Training records ▪ H&S (Emergency plan, accident register, PPE) ▪ POEs (H&S and environmental) ▪ Plantation water management plan ▪ Worker interview ▪ Boundary check (Coordinate taking and map verification) ▪ IMP ▪ Good Agricultural Practices ▪ Soil Management ▪ Use of fire and agrochemical ▪ Storages: agrochemical, fertilizers ▪ Training records



Aug 27, 2025				<ul style="list-style-type: none"> POEs Waste management plan Burning and use of fire
	13:00h - 17:00h	FK- ASI1RQ7RYS JC	Oil mill office	Environmental – Oil Mill Documentary review – Walkthrough Indicators : 7.3, 7.8, 7.11 <ul style="list-style-type: none"> Training records Waste management Burning and use of fire Water management
	13:00h - 17:00h	LR- ASI1YTSB5L RS	Oil mill office	Documentary review Indicators : 3.1.1, 3.6, 3.7 <ul style="list-style-type: none"> Business Plan H&S- Plantations Documentary review <ul style="list-style-type: none"> Training records Health and Safety Procedures Emergency procedures Accident Recording PPE Follow-up and monitoring
	8:00 am – 12:00 pm	DM - ASI1DTYEJK	Oil mill office	Consultation with internal stakeholders (1,2,4,6,7) <ul style="list-style-type: none"> Internal committees (Gender, Health and Safety, others) Workers' representatives
	13:00h – 17:00h		To be define	Stakeholder consultation (1,2,4,6,7) <ul style="list-style-type: none"> Local communities Government Entities
	12:00 pm – 13:00 h	Lunch		



	17:00 h	End of day 3		
Day 4: Documentary review, stakeholder consultations				
Aug 28, 2025	7.30 am	Meeting with Management to share the balance of the 3 audit day/ DM		
	8:00 am – 12:00 pm	DM - ASI1DTYEJK	Oil mill office	<p>Respect for labour rights - Policy review and implementation (Farms and oil mill) Indicators : 6.1, 6.2, 6.3, 6.4, 6.5, 6.6</p> <ul style="list-style-type: none"> ■ Freedom of association ■ Recruitment and payment of workers (oil mill and plantation) ■ Review of workers' files ■ Working hours ■ Living Wage ■ Gender Committee ■ Labour policies ■ Child Labour ■ Reproductive Rights ■ Complaints Mechanism ■ Forced Labour
	13 :30h – 17 :00h		To be define	<p>Consultation with external stakeholders (1,2,4,6,7)</p> <ul style="list-style-type: none"> ■ Contractors ■ Fruit suppliers ■ Previous owners ■ NGOS ■ Government entities



	7 :30 – 10 :30	LR- ASI1YTSB5L JC	Oil mill office	Labour and social procedures Indicators: 3.3.2, 3.3.2, 3.3.3, 3.5.1, 3.5.2, 3.7.1, 3.7.2 <ul style="list-style-type: none"> ▪ Recruitment, selection and hiring procedures / Records ▪ Monitoring and follow up mechanism ▪ Training records for farms and oil mill
	10 :30 am - 15 :30h			Legal Compliance Indicators: 2.1, 2.2, 2.3 <ul style="list-style-type: none"> ▪ Due diligence of contractors ▪ List of contracted parties ▪ Review of contracts, including fruit supply contracts ▪ Provenance of purchased fruit and land tenure
Aug 28, 2025	15 :30h – 17 :00h	LR- ASI1YTSB5L JC	Oil mill office	H&S – Oil mill - Documentary review – Walkthrough Indicators : 2.1.1, 3.2.2, 3.6, 3.7, 6.7 <ul style="list-style-type: none"> ▪ Training records ▪ Health and Safety Procedures ▪ Emergency procedures ▪ Accident Recording ▪ PPE ▪ Follow-up and monitoring
	7:30 am – 10:00 am			FK- ASI1RQ7RYS RS
	10:00 am – 17:00h	Agronomic and Environmental Records review Indicators : 7.7., 7.12 <ul style="list-style-type: none"> ▪ New planting on peat ▪ HCV monitoring records 		
	12:00 pm –	Lunch		



	13:00 h			
	17:00 h	End of day 4		
Day 5: Closing meeting – office				
Aug 29, 2025	7:30 am – 12:00 pm	DM - ASI1DTYEJK	Oil mill office	Health and safety, environment, agronomy, labor and social issues. Indicators: 1, 2, 3, 4, 5, 6, 7 Follow up on any pending issues and gather definitive evidence
	13:30 – 14:30	LR- ASI1YT5B5L FK- ASI1RQ7RYS		Preliminary RSPO P&C Closing Meeting
	15:00h – 16:00h	JC- Jony Jordão da Cruz RS- Romilson Silveira		Closing meeting Convene with all relevant staff to summarize audit findings, potential non-conformities, and next steps.

4.4. Changes of the initial audit plan (if applicable)

No changes.



4.5. Sampling Details

Description of Management Unit	Number of Estate/Members/Mills	Risk Factor	Result $x = (\sqrt{y}) \times (z)$	Total Sampled
<i>Mill</i>	1	N/A	N/A	All mills shall be audited.
<i>Own/Managed Estates</i>	2	High Risk	$x = (\sqrt{2}) \times (2) = 2,82$	2
<i>Scheme Smallholder</i>	N/A	Choose an item	N/A	N/A
<i>Scheme Outgrower</i>	N/A	Choose an item	N/A	N/A
<i>Independent Outgrower</i>	N/A	Choose an item	N/A	N/A

Notes: Auditing is based on a sampling process of the available information



4.6. Sampling History of Current Certification Cycle

Name (Mill/ Supply Base / Scheme Smallholder)	Year 1	Year 2	Year 3	Year 4	Year 5
	IC	ASA1	ASA2	ASA3	ASA4
	2021	2022	2023	2024	2025
Agripalma POM	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Farm 409	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Farm 410	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

4.7. Audit Team Leader and Audit Team Information

Audit Team Leader: Dina Maria Medem Cortés	
Requirements	Description
At least five (5) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing, or involvement in human rights activities;	Lead auditor has more than 7 years of experience in social and environmental responsibility certification audits. Additionally, he has led and participated in more than 15 RSPO certification stakeholder consultations.
A supervised (by a qualified lead auditor) period of training in practical audits against the RSPO P&C and/or RSPO ISH standard, with a minimum of 15 days audit experience in at least three (3) audits;	In the last 2 years the lead auditor was supervised in 3 audits by experienced lead auditors. Each audit lasted 5 days.
Successfully completed a refresher course for RSPO endorsed P&C lead auditor course every three (3) years after the initial qualification as lead auditor.	In June 2024 the auditor attended the RSPO P&C standard refresher course.



Audit Team Members:		
Requirements	CAB Auditor Number	Description
Possess a bachelor's degree or tertiary education in related disciplines, such as agriculture, environmental science or social sciences, etc;	Audit team Leader: DM ASI1DTYEJK	Food Engineer, Master in Food Science and Technology (Focus area: Fruit Processing) and Ph.D. in Food Science and Technology (Focus area: Organic Agroindustry and New Product Development).
	Audit Team Member 1: LR ASI1YTSB5L	Education: BS-Business Administration, Masters- Human Resource Management.
	Audit Team Member 2: FK ASI1RQ7RYS	Master's in environmental management and policy from the University of Cape Coast Ghana, BSc. Finance from the Garden City University College and HND in Wood Tech. from the Kumasi Polytechnic.
At least three (3) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing or involvement in human rights activities	Audit Team Member 1: LR ASI1YTSB5L	20 years' experience in Palm Oil Industry, 15 years plus experience in the implementation and auditing of Integrated Control Systems and Supply Chain Management, 18 years' experience as general Manager of Palm Oil Plantations, Consultant in business management in strategic planning, Agro-industrial Best Practices, social projects, and administrative process optimization, strategic and support direction. Main member representing palm oil growers in the RSPO P&C national interpretation V. 2018 (Colombia), and alternate member representing palm oil grower's category "rest of world" in the RSPO P&C V. 2023.
	Audit Team Member 2: FK ASI1RQ7RYS	Has 10 year industrial experience in forestry and wood production processes. Previously worked for Samartex Timber and Plywood Co Ltd and John Bitar Co. Ltd both in Ghana in managerial position coordinating production as well as FSC and FLEGT VPA activities. Has been involved in several FSC FM/CoC and RSPO 2nd and 3rd party audits for certification bodies and private organization in Ghana and beyond since 2016. Has also led and been involved in HCV-field



		assessment as a social expert since 2015.
Successfully completed an RSPO endorsed P&C lead auditor course	Audit team Leader: DM ASI1DTYEJK	Lead auditor P&C RSPO. Refresher course (2024)
	Audit Team Member 1: LR ASI1YTSB5L	RSPO P&C (2013) Lead Auditor Course, RSPO SCCS (2017) Lead Auditor Course, RSPO P&C (2018) Lead Auditor Updated, RSPO P&C (2018) Lead Auditor Updated June 2024, RSPO SCC (2020) Lead Auditor Updated, RSPO SCC (2020) Lead Auditor Updated July 2024, SA8000 Lead Auditor (2021)
	Audit Team Member 2: FK ASI1RQ7RYS	Successfully completed RSPO lead auditor trainings including RSPO P&C 2013 August 2015 by Proforest Africa, RSPO P&C 2018 refresher, March 2021 and 2024 by Checkmark Training.
Successfully completed the 5-day lead auditor course for ISO 9001 or ISO 14001 or ISO 45001.	Audit team Leader: DM ASI1DTYEJK	Lead auditor ISO 9001: 2015 CQI e IRCA Registry : 18168 (2017)
	Audit Team Member 1: LR ASI1YTSB5L	ISO 9001:2015 Lead Auditor.
	Audit Team Member 2: FK ASI1RQ7RYS	Successfully completed a 5-day ISO 9001:2015 – Lead Auditor Course, August 2019 by MacBens Multi Resources Ltd - Ghana
Demonstrable understanding of the latest version of RSPO Certification Systems	Audit team Leader: DM ASI1DTYEJK	RSPO Principles and Criteria Lead Auditor (2022).
	Audit Team Member 1: LR ASI1YTSB5L	RSPO P&C (2018) Lead Auditor Updated June 2024, includes RSPO Certification Systems. Internal training provided by SCS Global Services to reinforce knowledge and internal procedures of the organization.
	Audit Team Member 2: FK ASI1RQ7RYS	Participated in several RSPO organised webinars in the RSPO Certification Systems 2022 version. Implementing the system as a CB staff as well for the purpose of auditing and client management.
For auditors verifying compliance with NPP procedures, auditors shall additionally be trained in the assessment of compliance with FPIC, HCV and HCS requirements in the context of RSPO NPP procedure	Audit team Leader:	-
	Audit Team Member 1:	-
	Audit Team Member 2: FK	Successfully competed HCV Assessor Training, July 2015 by



	ASI1RQ7RYS	Proforest Africa and has led and participated in several Non-ALS HCV assessment in Ghana for FSC certification. Completed RSPO FPIC trainings through the RSPO online learning platform. Also completed RSPO webinars and online trainings on NPP 2020 version.
A supervised (by a qualified auditor/lead auditor) period of training in practical audit against the RSPO P&C, with a minimum of 10 days of audit experience in at least two (2) audits.	Audit Team Member 1: LR ASI1YTSB5L	Leading different audits of the RSPO P&C and SCC standards, supported by official reports submitted and published on the RSPO website. Prior to his participation, she went through the necessary accompaniment process and training period accompanied by a qualified lead auditor and subsequently audit approval under evaluation by an evaluator auditor.
	Audit Team Member 2: FK ASI1RQ7RYS	Qualified as RSPO Lead Auditor and Audit team member upon successfully completion of witness audits in 2016.
Knowledgeable and experience of the local/regional laws	Audit team Leader: DM ASI1DTYEJK	More than 6 years of experience on legislation in Latin America and Africa acquired through participation in audits.
	Audit Team Member 1: LR ASI1YTSB5L	More than 5 years of experience on legislation in Latin America acquired through participation in audits.
	Audit Team Member 2: FK ASI1RQ7RYS	Have been auditing in Africa since 2018 and familiar with some local national laws. However, in most case local expert from the country of audit is used in the interpretation of the country specific laws.
Knowledgeable in Best Agricultural Practices, and Integrated Pest Management, pesticide and fertiliser use;	Audit team Leader: DM ASI1DTYEJK	Experience on best agricultural practices, pest control and fertilizer use in Latin America and Africa for more than 6 years acquired through participation in audits.
	Audit Team Member1: LR ASI1YTSB5L	Implicit experience in environmental management and agricultural practices in the palm oil industry.
	Audit Team Member 2: FK ASI1RQ7RYS	-
Experience in health and safety auditing on the farm/plantation and in the palm oil mill, for example against the ISO 45001 Occupational Health and Safety Management standard;	Audit team Leader:	-
	Audit Team Member 1: LR	Trained and experienced in Occupational Health and Safety (OHS) standards.



	ASI1YTSB5L	
	Audit Team Member 2: FK ASI1RQ7RYS	Successfully completed OHSAS 18001 Lead Auditor, October 2015 by 360training.com. Have been auditing the HSE indicators since 2016.
Experience in handling workers' welfare or social auditing experience, such as experience with the SA8000 or other international sustainability scheme that has the social auditing requirements. The auditor auditing the social requirements shall have successfully attended the internationally recognised social auditing standard training, such as the SA8000, Social Systems (SMETA) Auditor Training or social training recognised by RSPO;	Audit team Leader: DM ASI1DTYEJK	SA8000 Basic Training 2022
	Audit Team Member 1: LR ASI1YTSB5L	SA8000 Basic Training, 2021
	Audit Team Member 2: FK ASI1RQ7RYS	Successfully completed SA8000 Lead Auditor Course, April 2021 by Social Accountability International. Also successfully completed Social Auditing – RSPO P&C Course, December 2021 organized by through WIRE Audited RSPO P&C as well FSC FM and CWFM social indicators since 2016. Handled social issues for FSC certified companies as an independent consultant.
Experience in handling of land rights, gender and indigenous peoples' issues;	Audit team Leader: DM ASI1DTYEJK	Proforest Academy online courses (2022) on: <ul style="list-style-type: none"> - Natural Resource Conflict Management. - Introduction to FPIC - Respecting the Rights of Indigenous Peoples and Local Communities - Gender Inclusion in Agro-Commodity Production - Introduction to the Multistakeholder Process (MSP) - Introduction to Responsible Business
	Audit Team Member 1: LR ASI1YTSB5L	Three years conducting RSPO audits on labour and social issues, including internal and external stakeholder consultations.
	Audit Team Member 2: FK ASI1RQ7RYS	Have been auditing the RSPO P&C as well FSC FM and CWFM social indicators which covers land right, gender and indigenous/local people rights since 2016. Handled social issues including land rights and local people rights for FSC certified companies as an independent consultant.
Experience in environmental and ecological auditing or assessments, such as experience with High Conservation Value	Audit team Leader: DM	Experience of more than 6 years in organic agriculture audits in Colombia and Brazil and technical



(HCV)/High Carbon Stock (HCS) assessments, organic agriculture or the ISO 14001 Environmental Management Systems standard;	ASI1DTYEJK	manager for more than 2 years in the Brazilian organic industry.
	Audit Team Member 1: LR ASI1YTSB5L	-
	Audit Team Member 2: FK ASI1RQ7RYS	With my background in environmental management and HCV training, periodically auditing environment and HCV indicators since 2016.
Fluent in one of the main national languages	Audit team Leader: DM ASI1DTYEJK	Fluent in Spanish and Portuguese and advanced English
	Audit Team Member 1: LR ASI1YTSB5L	Fluent in Spanish and English.
	Audit Team Member 2: FK ASI1RQ7RYS	Fluent in the English Language
Knowledgeable in supply chain requirements of the palm oil mill. The auditor performing this task shall have successfully completed the RSPO endorsed SCC lead auditor training course. Note: this does not apply for ISH or Group Certification.	Audit team Leader: DM ASI1DTYEJK	Lead auditor Supply Chain SCC RSPO. V2020. Refresher course (2022). Experience of more than 30 supply chain audits in different Latin American countries.
	Audit Team Member 1: LR ASI1YTSB5L	RSPO SCCS (2017) Lead Auditor, RSPO SCC (2020) Lead Auditor Updated, RSPO SCC (2020) Lead Auditor Updated July 2024.
	Audit Team Member 2: FK ASI1RQ7RYS	Successfully completed RSPO SCC Lead Auditor Course (2015), Sept. 2018, RSPO SCCS (2020) - Lead Auditor Refresher Course, April. 2020 and May 2023 all by Checkmark Training.



5. Audit Findings & Results

Criterion / Indicator	Audit Findings	Audit Findings (Public Summary)	Results	
Principle 1: Behave Ethically and Transparently				
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.				
1.1.1 (C)	<p>Management documents that are specified in the RSPO P&C are made publicly available and shall include (but are not necessarily limited to):</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); 		<p>Agripalma has a formal communication procedure that establishes that relevant company documents can be requested by any interested party through a written request or by email.</p> <p>These documents include social and environmental impact studies, assessments of areas of high conservation value, results of consultation processes, sustainability reports, and corporate policies.</p> <p>Requests must include a justification and are evaluated by senior management, which approves or denies access.</p> <p>In addition, the company keeps a record of all requests received, following the criteria established by the RSPO.</p> <p>There is evidence of communication to various stakeholders and signed records confirming the dissemination</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



	<ul style="list-style-type: none"> Public summary of certification assessment report; Human Rights Policy (Criterion 6.13). 		of this information.	
1.1.2	Information is provided in appropriate languages and made accessible to relevant stakeholders.		<p>Documentation intended for various stakeholders is available in Portuguese, the official language of São Tomé and Príncipe.</p> <p>During external consultations, community representatives, authorities, and contractors confirmed that they are fluent in Portuguese and understand the information received.</p> <p>In addition, the company's website provides public information in both Portuguese and English, such as the 2022 sustainability report.</p> <p>The document review showed that the company shares relevant information with its stakeholders and ensures that it does so in the national language.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
1.1.3 (C)	Records of requests for information and responses shall be maintained.		<p>Agripalma has a communication procedure, which describes that the company has a set of documents that are publicly available to anyone who makes a request in writing or by sending an email to the agripalma@agripalmastp.com</p> <p>The documents include all politics and procedures of AGRIPALMA.</p> <p>During the documents and records</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			verification and interviews performed no requests for information were evidenced.	
1.1.4 (C)	Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.		<p>Agripalma has a communication procedure that defines how internal and external communications are carried out and how documents or information can be requested.</p> <p>Minutes were presented from meetings held with communities where these procedures were explained, including how to access documents and the complaint mechanism.</p> <p>The company has a person responsible for coordinating relations with communities and maintaining ongoing dialogue with them.</p> <p>An opportunity for improvement was given. The management of the registration and processing of the support requests that are entered is not clearly defined in the company's communication procedures (See details in (OFI) #1).</p>	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input checked="" type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.		Agripalma has a list of contacts and details of interested parties and their designated representatives.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity



			<p>The list was last updated on August 8, 2025, and includes the entity, the name of the representative, and the contact number.</p> <p>The groups described include communities, the district of Caué, workers' organizations, the Government of São Tomé and Príncipe, and non-governmental organizations.</p>	<p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
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Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p>		<p>Agripalma has a Code of Ethics that establishes standards for appropriate conduct within the company.</p> <p>This code covers topics such as the responsible handling of information and documents, fair competition, the correct use of company resources and property, the prevention of conflicts of interest, respect for human rights at work, occupational safety, and compliance with laws and regulations.</p> <p>It also includes guidelines for relations with the government, the community, and the media, as well as general professional behavior.</p> <p>The company provides training to ensure that employees and subcontracted workers understand these principles. In addition, service contracts include an annex in which individuals confirm that they have received, read, and accepted Agripalma's Code of Conduct and Code of Ethics.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.		<p>The code of ethics is socialized with workers and suppliers, and there are records of socialization. Implementation is evidenced by compliance with contracts, payments to workers and suppliers, and commercial and labour commitments. During the external consultations several contractors were interviewed, and they confirmed that they have a contract with the company and that there are commitments made by them and the company, which are fulfilled maintaining a healthy and transparent business relationship.</p> <p>During internal consultations and interviews with employees, no actions were reported that would constitute a breach of the Code of Ethics.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction.

Criterion 2.1:
 There is compliance with all applicable local, national and ratified international laws and regulations.



<p>2.1.1 (C)</p>	<p>The unit of certification complies with applicable legal requirements.</p>		<p>Agripalma's legal department conducts quarterly reviews to ensure compliance with applicable laws and agreements.</p> <p>It was identified that some field workers were using tools they had purchased themselves. There are no individual delivery records, only general records of tools leaving the warehouse.</p> <p>This situation violates current labor regulations and the company's own internal regulations (See details in non-conformity #2).</p>	<p><input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>
<p>2.1.2</p>	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p>		<p>Agripalma uses a Legal Compliance Matrix to organize and verify compliance with laws related to labor, environmental, health and safety, tax obligations, operating permits, and other regulations.</p> <p>The matrix identifies the applicable standard, the responsible area, and the compliance status.</p> <p>This tool was updated in May 2025.</p> <p>In addition, the company applies a formal procedure to monitor and control legal changes to ensure their proper implementation.</p> <p>Despite conducting compliance assessments of its contractors, legal non-</p>	<p><input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>

			<p>compliance was detected among some of them.</p> <p>Among the observed cases were discrepancies between the number of insured workers and the actual number of active workers, contracts signed with inconsistent dates, workers without social security registration, and suppliers operating without a legal license or without being formally established.</p> <p>The evidence shows that the monitoring and verification processes do not fully guarantee legal compliance by all contractors (See details in non-conformity #3).</p>	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		<p>Agripalma's boundary delineation process ensures that concession areas are clearly marked and accessible, with security measures in place due to proximity to the Obô São Tomé National Park.</p> <p>The concession includes two land titles, with portions of one returned to the government, reducing the area to 2,400</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)

			hectares, of which 1,930 hectares are currently developed. Field assessments and stakeholder consultations confirmed that the plantation operates as a unified block without boundary conflicts or overlaps. Ongoing communication with authorities, including a formal ministry response, supports transparency and confirms there are no disputes or encroachment issues	
Criterion 2.2:				
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.				
2.2.1	A list of contracted parties is maintained.		The company has a list of contractors that includes the company name, contracted service, type of supplier, address, telephone number, email address, service contract date, and addendum with RSPO clauses.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		Agripalma establishes written agreements with most of its service providers, while certain services are managed through service orders or purchase orders. Since Fresh Fruit Bunches (FFB) are sourced exclusively from the company's own plantations, there are no external supplier contracts for FFB.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement

			<p>All operational service contracts include clauses requiring compliance with applicable legal requirements. These provisions ensure that contracted parties are aware of their obligations and commit to upholding relevant standards.</p> <p>Agripalma's Supplier Manual, updated in 2024, provides detailed guidance to service providers. It outlines expectations in areas such as:</p> <ul style="list-style-type: none"> • Human rights adherence • Compliance with labor laws • Business ethics • Environmental protection • Occupational health and safety <p>The company maintains contracts with a range of service providers, including security, transportation, field maintenance, catering, and waste management. Each agreement contains clauses mandating compliance with legal requirements, ensuring that all operations align with established standards.</p>	<input type="checkbox"/> Not Applicable (justification required)
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2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		<p>Agripalma’s operational service contracts include clauses prohibiting child, forced, and trafficked labor, reinforcing compliance with ethical labor standards.</p> <p>Since Fresh Fruit Bunches (FFB) are sourced solely from its own plantation, no supplier contracts exist for FFB.</p> <p>The reviewed agreements cover services such as security, worker transportation, field maintenance, catering, and waste management, with varying durations ranging from fixed terms to indefinite periods. This contractual framework demonstrates Agripalma’s commitment to responsible labor practices and oversight across its outsourced operations</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.				
2.3.1 (C)	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> ● Information on geo-location of FFB origins ● Proof of the ownership status or the right/claim to the land by the grower/ smallholder ● Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB 		<p>The company sources Fresh Fruit Bunches (FFB) exclusively from its own plantations, located within a government-granted concession area. A master list of plots is maintained, including geospatial mapping of the concession area. This ensures precise identification of FFB sources and supports traceability across all plantation operations.</p> <p>The company operates under a concession granted by the national government, with ownership status and land rights legally documented and verifiable. All necessary industrial operating permits have been issued by the relevant authorities, confirming compliance with applicable regulations.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.		N/A. The FFB is supplied by its own plantations.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)



Principle 3: Optimise productivity, efficiency, positive impacts and resilience

Criterion 3.1:

There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

3.1.1 (C)	A business or management plan (minimum three years) shall be documented and includes, where applicable, a jointly <input type="checkbox"/> oped business case for Scheme Smallholders.		Agripalma has a 25-year business plan to ensure long-term viability, focusing on productivity rather than expansion. Fresh Fruit Bunch supply comes from two plantations, with yields averaging 12–13 MT/ha and a crude palm oil extraction rate projected at 23% for 2025. The plan meets RSPO requirements, covering crop projections, extraction rates, production costs, and financial indicators, and is reviewed annually. Community investments include facilities such as a laundry, community center, and IT resources, while environmental commitments involve fertilization programs and efficiency improvements. Compliance with concession obligations is maintained through regular operational expenditures.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
3.1.2	An annual replanting programme projected for a minimum of five years, is available.		Not applicable. Agripalma replanting is not due now until 2030 – 2035 when is replanting projected.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



				<input checked="" type="checkbox"/> Not Applicable (justification required)
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken and has agenda with the following minimum items:</p> <p>Results of internal audits</p> <p>Customer feedback</p> <p>Process performance and product conformity</p> <p>Status of preventive and corrective actions</p> <p>Follow-up actions from management reviews</p> <p>Changes that could affect the management system</p> <p>Recommendations for improvement</p>		<p>The company conducts an annual management review, commensurate with the scale of its operations.</p> <p>The most recent review was carried out in July 2025 and addressed topics such as follow-up on previous actions, audit results, health and safety performance, acceptable party feedback, available resources, and potential changes that could affect the management system.</p> <p>Among the main findings, it was identified that the current certification remains in effect, there were no customer complaints during the evaluation period, and a new system for purchasing and inventory is being implemented.</p> <p>Staff stability will be maintained, even with the addition of new key roles. Goals for the health, safety, environment, and social aspects plan will be updated, including accident reduction, water efficiency, and the promotion of women's participation in leadership positions.</p> <p>Internal audit results were also reviewed, and it was noted that the operation's</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>location presents challenges for recruiting qualified personnel.</p> <p>Finally, progress in complying with applicable new international regulations was acknowledged.</p>	
<p>Criterion 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>				
3.2.1 (C)	<p>The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>Action plans include continual improvement for the following:</p> <ul style="list-style-type: none"> i. Optimising the yield of the supply base. ii. Reduction in use of pesticides (Criterion 7.2) iii. Environmental impacts (Criteria 3.4, 7.6 and 7.7) iv. Waste reduction (Criterion 7.3) v. Pollution and greenhouse gas (GHG) emissions (Criterion 7.10) vi. Impacts on communities, workers and smallholders (Principle 6) vii. Integrated management of HCV-HCS, peatland and other conservation areas 		<p>The company has a Continuous Improvement Plan that identifies and manages environmental, social, and occupational health and safety impacts.</p> <p>The document organizes activities, their potential impacts, control measures, responsibilities, and the implementation schedule.</p> <p>In the environmental sphere, aspects such as machinery use, soil and water management, biodiversity protection, waste management, wastewater treatment, and fertilizer management are considered, with the goal of reducing pollution and protecting natural resources.</p> <p>In the social sphere, actions are addressed to improve community infrastructure, strengthen relationships with communities, support local economic development, improve access to services, and promote</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



	(Criteria 7.7 and 7.12)		<p>food security and the sustainable use of water.</p> <p>In occupational health and safety, the plan includes preventive measures, risk control, accident management and recording, emergency preparedness, and training programs to reduce incidents and strengthen worker protection.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.		<p>The company submitted its annual metrics template for 2024, covering production data, training activities, accident rates, supplier demographics, and agrochemical usage. The database was reviewed during the audit, and the reported information was verified against actual records.</p> <p>Operations include one mill and multiple certified properties.</p> <ul style="list-style-type: none"> • The certified production area is fully documented, with a portion designated as high conservation value land. • Annual palm fruit production and yield levels were reported, showing consistent productivity across the review periods. • Workplace safety metrics were tracked, including lost time injury frequency rates. 	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<ul style="list-style-type: none"> • Training programs were actively implemented, with a majority of workers participating in RSPO-related sessions. 	
Criterion 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.				
3.3.1 (C)	Standard Operating Procedures (SOPs) for the unit of certification are in place.		<p>Agripalma has established a comprehensive framework of Standard Operating Procedures (SOPs) that govern its agricultural plantations, palm oil mill, and supporting departments. Approximately twelve SOPs guide plantation practices, covering areas such as riverbank demarcation, chemical spraying, pest and disease management, fertilizer application, fruit collection and transport, and harvest quality control. At the mill, nineteen SOPs regulate operations including workforce planning, sterilization, digestion and extraction, pit recovery, clarification, boiler monitoring, and power plant management.</p> <p>Additional SOPs are maintained for administrative, legal, and sustainability functions, ensuring consistency across all operations. These procedures are readily available at worksites for easy reference and implementation. Worker sensitization</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			is carried out through muster sessions, toolbox talks, and training programs. Field visits, interviews, and direct observation confirm that employees including harvesting teams, loose fruit pickers, and mill operators understand and apply the SOPs relevant to their roles.	
3.3.2	A mechanism to check consistent implementation of procedures is in place.		<p>Agripalma has established both field monitoring and internal audits as mechanisms to ensure consistent implementation of its procedures. At the plantation, monitoring is carried out on a daily, weekly, and monthly basis by the headperson, who reports any inconsistencies to supervisors or managers for corrective action. A checklist system is in place to record observations, including the <i>Ficha de Controlo de Qualidade Colheita</i> (Harvest Quality Control Form), which is used to monitor harvesting quality. Reports reviewed included those dated 28 September 2025 (Block G3), 23 August 2025 (Block H3), and 28 August 2025 (Block C3).</p> <p>Internal audits are also conducted to verify compliance with procedures relating to health, safety, and environmental management across plantation and mill operations. Audit reports reviewed</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			included those dated 16 June 2025 for Plantation Sections 1 and 2, and 13 August 2025 for the Industrial Factory.	
3.3.3	Records of monitoring and any actions taken are maintained and available.		<p>Agripalma maintains all documents, including SOPs, monitoring reports, and records of corrective actions, in a secure file system (OneDrive), which was made available for audit review. Interviews with plantation and mill teams confirmed that when non-conformities are detected during SOP checks, onsite training or calibration is conducted to address them. Internal audits reviewed included those dated 16 June 2025 for Plantation Sections 1 and 2, and 13 August 2025 for the Industrial Factory, all of which had post-calibration actions recorded.</p> <p>Several SOP trainings for workers were also verified. These included quality control operations for FFB conducted for headwomen and headmen on 16 July and 23 August 2025, harvesting SOP training for 32 new workers on 16 June 2025, pruning SOP training for 15 harvesters on 19 August 2025, and fertilizer application SOP training for 53 applicators on 18 February 2025. At the plantation, corrective actions focused primarily on preventing the harvesting of unripe</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)

			bunches, with calibration exercises conducted to reinforce proper harvesting practices.	
Criterion 3.4:				
A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.				
3.4.1 (C)	In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.		Agripalma has conducted a comprehensive Environmental and Social Impact Assessment (ESIA), updated in 2023. The study includes a stakeholder engagement plan, mitigation measures for environmental impacts, and an analysis of socioeconomic conditions in neighboring communities. Participatory mapping and seasonal calendar discussions were conducted to ensure local involvement in decision-making processes.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.		<p>The company has conducted several social and environmental impact assessments since 2011, with periodic updates through 2023.</p> <p>The most recent study, which includes the plantation within its scope, was prepared by an external entity, with the final report delivered in 2024.</p> <p>The study includes a project description, the applicable legal framework, baseline</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>environmental conditions, stakeholder engagement, a social and environmental impact assessment, a cumulative impact analysis, and an environmental and social management plan with mitigation measures and action plans.</p> <p>Key findings include the identification of environmental impacts and those associated with industrial operations, as well as findings from recent socioeconomic surveys.</p> <p>Supporting documentation demonstrates participatory processes with communities, analysis of ecosystem service use, the presence and differentiated use of forest areas, environmental management measures for effluents, and participatory tools such as community mapping, photographic records, and seasonal calendars developed with the local population.</p>	
3.4.3 (C)	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		<p>The Environmental Impact Assessment (EIA), updated in 2023 and formalized in 2024, incorporates a stakeholder engagement plan that documents the processes of public participation and consultation, as well as environmental and social action plans.</p> <p>These plans highlight the strengthening of the grievance mechanism as a</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)

			<p>demonstration of the commitment to the needs of stakeholders.</p> <p>Evidence of this includes formal invitations to communities for dialogue meetings on topics related to cooperation, addressing grievances, and updating social projects, as well as signed receipts from community representatives.</p> <p>Additionally, the assessment establishes an environmental and social impact management plan that includes mitigation measures such as periodic infrastructure maintenance, environmental monitoring, sampling, and improvements in effluent treatment.</p> <p>Records exist demonstrating the implementation of these measures, and reports are available for review.</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>				
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p>		<p>Agripalma has established clear, documented procedures for recruitment, induction, promotion, retirement, and termination of employment contracts, ensuring transparency and compliance with labor standards.</p> <p>The Human Resources Management Procedure outlines steps from announcing</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



			<p>vacancies to formalizing contracts and integrating new employees, while also addressing training needs and evaluating skill development. Induction procedures ensure new staff are informed about contracts, attendance, salaries, leave, and workplace safety, and retention is verified through checklists. Promotion processes rely on performance evaluations over two years that consider attendance, discipline, competence, and teamwork, with proposals requiring CEO approval.</p> <p>Termination and retirement procedures involve HR oversight, notification to labor and social security authorities, and coordination with legal and accounting teams to safeguard employee rights. In line with national law, private sector workers may retire at 62 (men) or 57 (women) with at least 25 years of contributions, receiving pensions based on service and salary, sometimes supplemented by subsidies. Internal regulations and supporting documents were reviewed during the audit, confirming compliance and proper implementation.</p>	
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3.5.2	Employment procedures are implemented and records are maintained.		<p>Agripalma implements employment procedures and maintains records in line with internal work regulations and human resources policies.</p> <p>Contracts include key elements: parties involved, purpose, duration, workplace, remuneration, working hours, confidentiality, vacation, and a clause addressing omissions.</p> <p>Both indefinite and variable-term contracts are used and are formally approved by the Ministry of Labor of São Tomé and Príncipe, and copies are delivered to employees.</p> <p>Multiple long-term employees (ranging from 3 to 14+ years of service) were interviewed.</p> <ul style="list-style-type: none"> • Evidence reviewed includes: • Payroll receipts for recent months. • Training records on free association, activity tables, yields, and unit prices for piecework. • Settlement of vacation periods and salary payment support. • Accident reporting and investigation procedures, including disability payment records. 	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.				
3.6.1 (C)	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		<p>Agripalma maintains an Occupational Risk Assessment Map covering all palm oil production activities and the matrix identifies hazards, assesses risks, and outlines preventive and corrective measures.</p> <p>A Risk Management Procedure defines the methodology for identifying and managing risks across different jobs and activities.</p> <p>The company has a formal HSE Plan designed to prevent accidents, occupational illnesses, and environmental damage. Objectives include ensuring employee safety, protecting company assets, and complying with environmental legislation.</p> <p>The Sustainability, H&S, and Environment Department develop, disseminates, and monitors compliance with this plan.</p> <p>Some specific procedures for H&S:</p> <ul style="list-style-type: none"> • Medical Leave: Defines how employee medical absences are managed and documented. • Work at Height: Establishes safety 	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>measures for tasks performed above ground level.</p> <ul style="list-style-type: none"> • Confined Spaces: Outlines precautions and safe practices for working in enclosed or restricted areas. • Emergency Response: Provides guidelines for handling workplace emergencies to protect employees and assets. • Lockout/Tagout (LOTO): Ensures machinery and equipment are safely disconnected and locked out during maintenance, cleaning, or operation to prevent accidental energy supply and protect workers. • Chemical Spraying: Details safe handling and application of agricultural chemicals to protect workers and the environment. • Fruit Collection, Loading, and Transportation: Standardizes processes for harvesting and moving palm fruit efficiently and safely. • PPE Management and Distribution: Ensures proper allocation, use, and monitoring of personal protective equipment for employees. 	
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3.6.2 (C)	The effectiveness of the H&S plan to address health and safety risks to people is monitored		<p>Risk Assessment and Control Activities</p> <ul style="list-style-type: none"> - Plantations (Pruning) Hazards/Risks: Falling objects, palm frond thorns, injuries. Controls: Practical training, supervision by experienced workers, correction of unsafe techniques, periodic training, mandatory use of helmets and protective boots. - Oil Mill (Fruit Unloading) Hazards/Risks: Falling fruit, thorn injuries, multiple injuries. Controls: Drivers must ensure unloading areas are clear of workers; employees must move away during unloading. - Warehouse (Worker Transportation) Hazards/Risks: Vehicle malfunctions, poor maintenance, non-compliance with road safety rules, accidents. Controls: Compliance with maintenance plans, driver training on road safety, daily vehicle inspections (oil, brakes, tires, lights). <p>Annual HSE Inspection Plan</p>	<input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>Inspections conducted across oil mill, plantations, workshops, parking, security, ponds, offices, construction sites, chemical storage/mixing, gas storage, generators, kitchens, and waste sites.</p> <p>Findings included: damaged PPE, poor ventilation, unsafe electrical sockets, missing first aid supplies.</p> <p>Corrective actions were implemented for all non-conformities.</p> <p>Training and Awareness</p> <p>Induction training provided for new employees.</p> <p>Annual Training Plan covers: first aid, emergency evacuation, chemical handling, working at height, confined spaces, and other H&S topics.</p> <p>Worker interviews confirmed general awareness of occupational risks.</p> <p>Non-Conformities Identified</p> <p>Oil Mill:</p> <p>Noise Exposure: Factory workers not using hearing protection despite noise levels above permitted limits.</p> <p>Boiler Station Risks: Operators lacked adequate PPE; a near-accident was witnessed.</p>	
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			Plantation: Unsafe Tool Handling: Blades transported unsafely (e.g., tucked in boots, hanging loosely), posing serious risks.	
Criterion 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.				
3.7.1 (C)	<p>A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>Training for workers must cover, at minimum, the following:</p> <ul style="list-style-type: none"> - the health and environmental risks of pesticide exposure; - recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women); - International and national instruments or regulations that protect workers' health; - Productivity and best management practice; - relevant SOPs. 		<p>The POM Training Plan – 2025 is designed to support professional development, enhance skills, and improve worker productivity and efficiency.</p> <p>Training effectiveness is systematically evaluated through a spreadsheet record system, tracking training details, evaluation methods, outcomes, and certification.</p> <p>POM Training Plan – 2025 Topics</p> <ul style="list-style-type: none"> - Onboarding and integration (HR induction manual, job descriptions) - HSA induction - Quality policy and objectives - Company procedures - Biodiversity awareness (São Tomé) - Firefighting and use of extinguishers - First aid - Emergency evacuation (laboratory) - Storage and handling of chemical 	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>products</p> <ul style="list-style-type: none"> - Rodent control in the factory - Working at height and in confined spaces - Harassment and violence prevention - Relevant awareness topics <p>Plantations Training Plan – 2025 Topics</p> <ul style="list-style-type: none"> - Training procedures - Biodiversity monitoring (riverine areas) - Firefighting and first aid - Emergency evacuation (laboratory) - Chemical storage and handling - Environmental spills and waste management - Drinking water treatment and distribution - Gas storage - Ergonomics in agriculture - Working at height and confined spaces - Accident reporting and form filling - Road safety - Rodent control and integrated pest management - Maintenance and harvesting procedures - Soil and leaf analysis - Harvest quality management - Riverside area management - Fertilizer application 	
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			<ul style="list-style-type: none"> - Supply chain requirements - Maternity protection - RSPO certification <p>Interviews confirmed that training courses were fully understood by workers, validating effective knowledge transfer and practical application.</p>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.		<p>Agripalma demonstrated compliance with RSPO Principles and Criteria by maintaining detailed records of training needs assessments and formal training sessions, which were reviewed during the audit and confirmed traceability of worker participation and completion.</p> <p>The 2025 training program covered diverse topics such as pest and disease management, leaf sampling, emergency preparedness, workplace accident procedures, harassment and violence prevention, harvesting, chemical handling, internal work regulations, fire prevention, first aid, waste management, and RSPO policies. Evidence of a structured evaluation system was available through</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			spreadsheets documenting training details, effectiveness assessments, and certification outcomes, ensuring that training was both implemented and monitored effectively	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.		<p>The company provides appropriate training for personnel performing tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p> <p>POM Training Plan – 2025 The plan covers a broad range of topics, including: Operational Processes: Specialized Operations: assembly and filling of flexitanks, completing checklists. Training Records (2025) Supply Chain Requirements – 1 participant. Purchasing & Supplier Management – 13 participants. Complaints Management Procedures – 3 participants. Auditing Procedure – 3 participants. FFB Quality Control – 7 participants. FFB Reception (fruit separation) – 11 participants. Weighing Station Procedure (review) – 2</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>participants.</p> <p>Sterilization Operational Procedure – 5 participants.</p> <p>Flexitank Assembly & Checklist Completion – 4 participants.</p> <p>Worker interviews confirm knowledge transfer and practical application of training.</p>	
<p>Criterion 3.8: Supply Chain Requirements for Mills</p>				
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme</p> <p>Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.</p>		<p>Agripalma applies the Identity Preserve (IP) supply chain model, ensuring that all palm oil production originates exclusively from its own certified plantations and that no Fresh Fruit Bunches (FFB) are purchased from third parties.</p> <p>In the event non-certified products are acquired, documented procedures and strict record-keeping guarantee complete separation from certified products during transport and storage.</p> <p>To maintain traceability, the factory verifies and documents the tonnage and certification sources of FFB received, following its weighing station procedures.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



			The company also uses the Widrasoft system to capture and record FFB weights, providing accurate and reliable data that supports full traceability across the processing chain.	
3.8.2	<p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.</p>		N/A, the company has IP model and does not have the Mass Balance (MB) model within its scope.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>		<p>During the audit, Agripalma presented production data and projections based on planted hectares and crop growth, confirming traceability under the Identity Preserve (IP) model.</p> <p>For the evaluated period, the company processed 21,107 MT of certified Fresh Fruit Bunches (FFB), producing 4,741 MT of Certified Sustainable Palm Oil (CSPO) with an Oil Extraction Rate (OER) of 22.46%, of which 3,543.32 MT were sold as certified, and 1,220 MT of Certified Sustainable Palm Kernel (CSPK) with a Palm Kernel Extraction Rate (PKER) of</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)

			5.78%, with no sales recorded. For the next period, projections indicate 23,500 MT of certified FFB, 5,523 MT of CSPO with an improved OER of 23.5%, and 940 MT of CSPK with a PKER of 4.0%.	
3.8.4	The mill shall also meet all registration and reporting. Requirements for the appropriate supply chain through the RSPO IT platform		<p>During the audit, Agripalma's transaction records were verified through the PRIMSA platform, confirming traceability of Certified Sustainable Palm Oil (CSPO) sales under the Identity Preserved (IP) supply chain model.</p> <p>The organization reported 5,523 MT of CSPO sales linked to its certification, with transactions documented in a traceable format and validated against certificate requirements. Seven sales transactions were reviewed, conducted between Agripalma and SOGESCOL FR S.A., demonstrating compliance with RSPO standards and ensuring transparency in the company's supply chain operations.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
3.8.5	<p>Documented Procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all</p>			<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



	<p>elements of the supply chain model requirements</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records)</p> <p>c) Identification of the role of the person having the overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFB's including ensuring no contamination in the IP mill.</p>			
3.8.6	<p>Internal Audit</p> <p>(i) The mill shall have a written procedure to conduct an annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO SC requirements for mills and the RSPO Rules on Market Communication and Claims</p> <p>b) Effectively implements and</p>		<p>Agripalma follows an internal audit procedure established in 2021 to ensure compliance with the RSPO Supply Chain Certification Standard 2020 and related communication requirements.</p> <p>The annual audit, reviewed in August 2025, included a checklist aligned with RSPO indicators, evaluation results, and conclusions, with most findings marked as</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



	<p>maintains the standard requirements within its organization.</p> <p>(ii) Any con-conformities found as part of the internal audit shall be issued and required corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mills shall maintain the internal audit records and reports.</p>		<p>compliant. One non-conformity was identified, but corrective actions were implemented and verified. The audit also confirmed that the lead auditor had the required training and competence to conduct RSPO supply chain audits effectively</p>	
3.8.7	<p>Purchasing and Goods In</p> <p>(i) The mill shall verify and document. The tonnage and sources of certified and the tonnage of non-certified FFB's received.</p> <p>(ii) The mill shall inform the CB immediately if there is a projected overproduction of certified volume</p> <p>(iii) The mill shall have a mechanism in place for handling of non-conforming FFB and/or documents.</p>		<p>Agripalma processes only Fresh Fruit Bunches (FFB) from its own certified plantations, ensuring no external sourcing. A scale system registers and categorizes each batch, supported by tickets that record vehicle details, fruit condition, and lot codes linked to certified databases, aligning with the RSPO Identity Preserved (IP) model.</p> <p>Non-conforming products are managed under established procedures to prevent contamination or misclassification, while the Sustainability Coordinator oversees communication with the certification body in case of projected overproduction.</p> <p>For the audit period August 2024 to July</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



			<p>2025, the company processed 21,107 MT of certified FFB, producing 4,741 MT of CSPO and 1,220 MT of CSPK, with extraction rates of 22.46% and 5.78% respectively. Robust traceability systems and clear responsibilities ensure compliance with RSPO standards and accurate monitoring of certified volumes</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation 		<p>Agripalma demonstrates compliance with RSPO supply chain standards by maintaining thorough documentation and transparent processes for the export of certified palm products. The company ensures that all required information—such as product details, shipment dates, certification numbers, and volumes—is accurately recorded and shared with customers to guarantee traceability.</p> <p>Between August 2024 and July 2025, Agripalma processed over 21,000 MT of certified fruit, producing nearly 4,800 MT of Certified Sustainable Palm Oil (CSPO) and 1,200 MT of Palm Kernel (CSPK), with more than 3,500 MT of CSPO sold under the Identity Preserved model. All transactions are carefully distinguished from conventional sales, systematically monitored, and reported to uphold RSPO standards and safeguard supply chain</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



	i) A unique identification number		integrity.	
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant</p>		<p>Agripalma maintains strict compliance with RSPO supply chain standards by keeping full control over its certified products and closely monitoring subcontractors.</p> <p>All oil processing is carried out internally, with no outsourcing of production activities. For transportation, the company contracts</p> <p>TRANSLOG under an agreement that preserves Agripalma's legal ownership of the oil throughout transit, ensuring traceability and integrity. Contractors are provided with a manual that includes provisions allowing Agripalma or the Certification Body to conduct compliance visits. These measures, combined with clear oversight mechanisms, safeguard transparency and uphold the certified supply chain's credibility</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



	<p>contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>			
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<ul style="list-style-type: none"> • 	<p>Agripalma maintains an updated Service Provider List that records all third-party providers engaged by the company, including their roles and contracted services. This centralized register strengthens oversight and transparency by documenting active contracts, supporting supply chain traceability, and ensuring compliance with RSPO requirements. By systematically tracking service providers, Agripalma can effectively monitor operations and uphold accountability across its certified supply chain</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
3.8.11	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>		<p>Agripalma complies with RSPO requirements by ensuring that any new contractors involved in processing or handling certified oil are reported in advance to the certification body. For the current period, there have been no changes in transportation services, with TRANSLOG remaining the sole provider</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p>



			on the island responsible for transporting Agripalma's certified products. This continuity supports traceability and reinforces compliance with RSPO supply chain standards.	<input type="checkbox"/> Not Applicable (justification required)
3.8.12	Record Keeping (i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. (ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. (iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. (iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.		<p>The company follows strict supply chain custody requirements by retaining records for at least two years in line with legal and regulatory standards, ensuring certified status of raw materials and products. During audits, documentation such as supply records, dispatch sheets, weighing tickets, and export documents are reviewed to confirm compliance.</p> <p>A digital system is used to track the weight of inputs and certified outputs in real time, preventing sales when certified volumes are unavailable. Inventory is continuously updated, and production records verify that sufficient certified stock is always on hand to meet dispatch requirements, demonstrating adherence to certification standards</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)</p>			
3.8.13	<p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>		<p>Agripalma conducts daily monitoring of crude palm oil and kernel recovery by calculating extraction rates based on the volumes of fresh fruit bunches processed and the resulting oil and kernel produced.</p> <p>For the period from August 2024 to July 2025, the company processed over 21,000 metric tons of certified fruit, yielding approximately 4,700 metric tons of crude palm oil and 1,200 metric tons of palm kernel. This corresponds to an oil extraction rate of about 22% and a kernel extraction rate of nearly 6%, reflecting consistent tracking and verification of production efficiency</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against</p>		<p>Agripalma conducts daily monitoring of crude palm oil and kernel recovery by</p>	<input checked="" type="checkbox"/> Conform



	<p>actual performance or industry average if appropriate.</p>		<p>calculating extraction rates based on the volumes of fresh fruit bunches processed and the resulting oil and kernel produced.</p> <p>For the period from August 2024 to July 2025, the company processed over 21,000 metric tons of certified fruit, yielding approximately 4,700 metric tons of crude palm oil and 1,200 metric tons of palm kernel. This corresponds to an oil extraction rate of about 22% and a kernel extraction rate of nearly 6%, reflecting consistent tracking and verification of production efficiency</p>	<p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>		<p>Agripalma ensures compliance with RSPO supply chain standards by exclusively processing fruit under the Identity Preserved (IP) model.</p> <p>Certified Supply Base:</p> <ul style="list-style-type: none"> • All Fresh Fruit Bunches (FFB) processed by the company originate solely from Agripalma's own certified plantations. • No FFB is received from third-party suppliers, ensuring complete control and traceability of the supply chain. 	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>

3.8.16	<p>Registration of Transactions</p> <p>(i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>(ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>		<p>Agripalma ensures accurate record-keeping and reporting for transactions involving certified products.</p> <p>Certified Product Transactions (01 August 2024 – 31 July 2025):</p> <p>The company records and tracks transactions involving Certified Sustainable Palm Oil (CSPO) under the Identity Preserved (IP) supply chain model.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>		<p>Agripalma has a RSPO trademark license iicense:</p> <p>License Name: SOCFIN SA</p> <p>RSPO Membership Number: 1-0269-19-000-00</p> <p>License Number: 1-0269-19-100-00</p> <p>Type: Product related</p> <p>Scope of Trademark Use:</p> <p>The license authorizes the use of the RSPO trademark in business-to-business and business-to-consumer communications, subject to compliance with the RSPO Rules on Market Communications and Claims.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>

Principle 4: Respect Community and Human Rights and Deliver Benefits

Criterion 4.1:
The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders

4.1.1 (C)	<p>A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>		<p>The company has a Human Rights Policy and Protection of Human Rights Defenders, whose objective is to promote respect for human rights and prevent risks related to its operations and supply chain.</p> <p>Recognize themselves as defenders of human rights to local communities, unions, social organizations, academics and other actors.</p> <p>The company is committed to:</p> <p>Ensure the implementation and dissemination of policy among employees, contractors and communities.</p> <p>Do not tolerate threats, intimidation, violence or reprisals against people who present concerns or denounce good faith.</p> <p>Protect defenders of human rights, their families, communities and working conditions against any form of attack or interference.</p> <p>Maintain an open and constructive dialogue with human rights defenders during their advocacy processes or the presentation of concerns.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
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			The policy is communicated both internally and externally, and there is evidence of its dissemination, such as meetings with communities and materials published in the facilities.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.		<p>The company has a policy against sexual harassment and other forms of workplace harassment and violence, which states that:</p> <p>Sexual harassment can manifest in one or more acts and can be physical, verbal, or nonverbal. Intimidation, threats, coercion, and damage to property, among others, are also considered forms of violence or harassment.</p> <p>The company promotes a peaceful relationship with its employees and communities and does not use private armed groups in its operations.</p> <p>During the review of documents and interviews with staff, no cases of harassment, violence, or the use of mercenaries or paramilitary groups were identified.</p> <p>The existence of active reporting channels for reporting situations related to harassment was also verified.</p> <p>Evidence: Training record where the policies are shared and participants are</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			informed about the reporting mechanisms. Date: June 14, 2025.	
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Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.

4.2.1 (C)	The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.		<p>The company has internal and external complaint handling procedures in place to ensure that all complaints are managed fairly, impartially, and transparently.</p> <p>The internal procedure addresses situations between employees or between employees and the company.</p> <p>The external procedure applies to complaints submitted by individuals or organizations outside the company.</p> <p>This procedure emphasizes the guarantee of confidentiality, so the complainant's identity can be kept confidential upon request. During the review of documentation and consultation with stakeholders, no records of community-related conflicts were found.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		<p>Agripalma has External claims procedure created on 18.02.2022</p> <p>The grievance system is accessible and understood by affected parties, including illiterate individuals, with mechanisms in place for assisted communication.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



			No disputes regarding the system's accessibility were noted.	<input type="checkbox"/> Not Applicable (justification required)
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		<p>Since the last audit, six complaints have been registered from different communities.</p> <p>The matrix consolidates information on the receipt, handling, progress, and closure of each case.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.2.4	The conflict resolution mechanism includes 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>The company has an external complaints procedure designed to ensure that claims are handled fairly, impartially, and transparently.</p> <p>This mechanism respects traditional dispute resolution methods and does not limit individuals' right to pursue legal recourse or external alternatives.</p> <p>Furthermore, the Free, Prior, and Informed Consent (FPIC) procedure includes the option of using external mediators and allows the parties involved to seek independent advice and observer support, as confirmed during the consultation with stakeholders.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)

Criterion 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1 (C)	Contributions to community development that are based on the results of consultation with local communities are demonstrated.		<p>The consolidated update of community projects planned for 2025 was presented.</p> <p>The document “Community Social Projects” records 48 initiatives with information on their description, benefited community, progress, responsibilities and implementation deadlines.</p> <p>Total projects: 13 are closed 24 is in execution 11 pending approvals.</p> <p>The actions benefited several communities, including Emolve, Clotilde, Praia Pesqueira, Ribeira Peixe, Malanza, Porto Alegre, Dona Augusta and Iô Grande.</p> <p> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) </p>



Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1 (C)	<p>Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>		<p>The company submitted documentation proving its legal right to the land concession and use, as well as the agreements related to its management. The documents reviewed included:</p> <p>An inventory of assets used to support the negotiation process for the transfer of property.</p> <p>A concession agreement issued by the government, which defines obligations, duration, land use, environmental conditions, and responsibilities. Provisional possession titles for two areas of land, which were subsequently replaced by the definitive concession agreement, in accordance with applicable law.</p> <p>In addition, an addendum to the concession agreement signed in 2023 was submitted, in which:</p> <p>The company returns a portion of the originally granted area to the State, including land and infrastructure.</p> <p>The company retains ownership of another portion of the area, specified in the document and delimited on attached maps.</p>
			<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			The addendum takes effect upon its signature by both parties.	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include.</p> <p>a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p>		<p>Agripalma's plantations operate on land leased from the government, with documentation confirming the legality of its tenure. While there is no current evidence of a formal free, prior and informed consent (FPIC) process or negotiated agreements, interviews with stakeholders indicate that the company maintains regular dialogue with communities and union representatives through established social spaces and periodic meetings.</p> <p>Agripalma has also developed a formal FPIC procedure (20210819-HSA-006-CLIP) as part of its external relations framework, designed to guarantee access to information, transparent communication, and constructive engagement with neighboring communities should such a process be required.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.4.3 (C)	<p>Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and</p>		<p>Maps developed through participatory mapping processes clearly delineate concession boundaries, involving input from affected communities and neighboring stakeholders.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity



	relevant authorities).			<input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements..		All relevant information, including impact assessments and benefit-sharing arrangements, is communicated in Portuguese, ensuring accessibility and understanding by local stakeholders.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.4.5 (C)	Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.		Communities are represented by freely chosen representatives, as evidenced by declarations from Praia Pesqueira and Ribeirão Peixe. Stakeholder interviews confirmed the legitimacy of representation.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.		<p>During the documentary review and interviews with the communities, it was found that there are currently no negotiation agreements or free, prior and informed consent processes.</p> <p>However, the company does have a free, prior and informed consent procedure</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



			The existing procedure ensures that FPIC processes are in place and would be applied if needed.	<input type="checkbox"/> Not Applicable (justification required)
Criterion 4.5:				
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions				
4.5.1 (C)	Documents showing identification and assessment of demonstrable legal, customary and user rights are available		The review found no evidence of lands with legal, customary, or use rights among stakeholders. Documentation confirmed that Agripalma holds a government concession contract dated 01 October 2016 for lands in the District of Caué, totaling 4,917 hectares. Within this contract, Agripalma commits to complying with national labor and social legislation, international human rights standards, and to implementing sustainable and responsible agricultural practices that uphold environmental and social responsibility.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.5.2 (C)	FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access		Regular communication is maintained with communities to ensure respect for legal and customary rights. No FPIC processes are currently underway, as no lands with customary or user rights were identified during the audit. The concession contract emphasizes compliance with	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



	<p>to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>		<p>environmental and social responsibilities and aligns with FPIC principles.</p>	<p><input type="checkbox"/> Not Applicable (justification required)</p>
<p>4.5.3</p>	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements should be non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>c) Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on</p>		<p>No new plantations were identified during the audit, document review and community interviews.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



	the land.			
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.		No new plantations were identified during the audit, document review and community interviews.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.		No new plantations were identified during the audit, document review and community interviews.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator..		No new plantations were identified during the audit, document review and community interviews.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.		No new plantations were identified during the audit, document review and community interviews.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.5.8 (C)	New lands are not acquired in areas inhabited by communities in voluntary isolation.		No new plantations were identified during the audit, document review and community interviews.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
Criterion 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.				
4.6.1 (C)	A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.		Agridpalma operates on land that was leased by the government and the plantations operating there are legally recognized by the neighbours.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



				<input checked="" type="checkbox"/> Not Applicable (justification required)
4.6.2 (C)	A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		Agripalma operates on land that was leased by the government and the plantations operating there are legally recognized by the neighbours.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.		Agripalma operates on land that was leased by the government and the plantations operating there are legally recognized by the neighbours.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.		Agripalma operates on land that was leased by the government and the plantations operating there are legally recognized by the neighbours.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)

Criterion 4.7:				
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements				
4.7.1 (C)	A mutually agreed procedure for identifying people entitled to compensation is in place.		Agripalma operates on land that was leased by the government and the plantations operating there are legally recognized by the neighbours.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.7.2 (C)	A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.		Agripalma operates on land that was leased by the government and the plantations operating there are legally recognized by the neighbours.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.		Agripalma operates on land that was leased by the government and the plantations operating there are legally recognized by the neighbours.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



				<input checked="" type="checkbox"/> Not Applicable (justification required)
Criterion 4.8:				
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.				
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.		No land disputes were identified during the visit to Agripalma's agricultural and administrative facilities, nor during the review of the registration matrix for documented grievances or requests submitted by stakeholders regarding land use or rights.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
4.8.2 (C)	Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		No land disputes were identified during the visit to Agripalma's agricultural and administrative facilities, nor during the review of the registration matrix for documented grievances or requests submitted by stakeholders regarding land use or rights.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable		No land disputes were identified during the visit to Agripalma's agricultural and administrative facilities, nor during the review of the registration matrix for documented grievances or requests	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity



	customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).		submitted by stakeholders regarding land use or rights.	<input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).		No land disputes were identified during the visit to Agripalma's agricultural and administrative facilities, nor during the review of the registration matrix for documented grievances or requests submitted by stakeholders regarding land use or rights.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)

Principle 5: Support Smallholder Inclusion

Criterion 5.1:

The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
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5.1.2 (C)	Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
5.1.3 (C)	Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
5.1.4 (C)	Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)



5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
5.1.6 (C)	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)



5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
5.1.9 (C)	The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains				
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)



5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder)</p> <p>PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders.</p>		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production..		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
5.2.4 (C)	Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)



5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.		Not applicable, not smallholders within the supply base of FFB.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
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Principle 6: Respect Workers Rights and Conditions

Criterion 6.1:

Any form of discrimination is prohibited.

6.1.1 (C)	Publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.		<p>The company is based on a Policy Manual issued by the General Directorate that includes principles of equality and equity of gender, race, ethnicity and organizational culture, as well as the promotion of equal opportunities at all levels. We also have a Code of Ethics (edition August 2022, updated in January 2025) that establishes respect for human rights in the work environment, promoting an environment free of intimidation, discrimination or coercion.</p> <p>The company offers training to employees and contractors on the principles of the code, based on documented evidence of assistance and reception by the contracting companies.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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			During the visit to the facilities, the publication of the Human Rights Protection Policy and the existence of Human Rights Defenders were verified.	
6.1.2 (C)	Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees		<p>It was verified that the company carries out a formal recruitment and selection process, through public calls, without the use of intermediaries or charging workers. This was confirmed through interviews and documentary review.</p> <p>No migrant workers were identified in agricultural or industrial areas, as more than 90% of the staff come from local communities.</p> <p>In senior management positions, the company has seven foreign professionals in the areas of management and sustainability, from Portugal, Angola and France.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available		<p>The company has a formal procedure for recruiting personnel (Code ADM-012, Revision 2, dated June 17, 2022), which establishes the following phases: documentary selection, pre-interview, interview and aptitude tests (if applicable), hiring and communication of results.</p> <p>The Human Resources area manages the publication of vacancies, both internal (with approval from general management) and external, and uses a checklist of</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>documents to ensure compliance with the process.</p> <p>It was verified that candidates undergo medical evaluations to confirm their physical and mental fitness before being hired.</p> <p>During interviews and documentary review, it was confirmed that the company publishes its vacancies openly, does not use intermediaries or charge for hiring.</p> <p>As evidence, files of workers with professional training appropriate to the position and medical entry examinations carried out in March 2025 were reviewed.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women</p>		<p>The procedure for recruiting new workers. 06.17.2022, establishes that the worker must undergo a medical evaluation to confirm physical and mental aptitude for the exercise of his function. Pregnancy tests are not part of this evaluation.</p> <p>During the interviews and the documentary review, it was possible to verify that pregnancy tests are not carried out in the hiring process.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
6.1.5 (C)	<p>A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>		<p>The company has a Gender Committee comprised of field and administrative staff, both men and women.</p> <p>The Induction Manual informs employees about the existence of the Gender Committee, emphasizing the</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p>



			<p>importance of women organizing themselves to identify and address situations related to their rights.</p> <p>The committee meets quarterly, and evidence from a meeting held in August 2025 was reviewed.</p> <ul style="list-style-type: none"> → The following topics were discussed: Results of a survey conducted with new mothers. → Proposals to improve working conditions for working mothers. → Introduction of committee members to different areas of the company. → Organization of activities for women. <p>As part of these efforts, a questionnaire was administered to pregnant, breastfeeding, and postpartum women to understand their needs regarding breastfeeding, maternity leave, workplace safety, and nutrition.</p> <p>The proposed improvements include: streamlining breastfeeding allowance payments, completing renovations in rest and dining areas, and facilitating closer work locations for breastfeeding mothers.</p>	<input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.1.6	There is evidence of equal pay for the same work scope		During the document review and interviews with field and operational staff, it was confirmed that individuals receive the same	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity



			<p>salary for performing the same job, calculated based on hours worked.</p> <p>Several pay stubs for the same period were reviewed, revealing that:</p> <p>Field workers with the same job duties receive the same base salary.</p> <p>Health and Safety Officers also receive the same base salary as those performing the same job duties.</p> <p>This confirms the application of equal pay for equivalent work within the company.</p>	<p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
<p>Criterion 6.2:</p> <p>Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW)</p>				
6.2.1 (C)	<p>Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.</p>		<p>The induction document for new employees includes both the entry procedure and the dissemination of information on remuneration and working conditions, addressing topics such as the code of conduct, employment contract, salary payments and advances, attendance control, vacations and freedom of association.</p> <p>Employment contracts establish the essential legal elements (object, duration, remuneration, schedule, confidentiality and vacations), are written in Portuguese, signed by both parties, registered with the Ministry of Labor and delivered to the worker.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>

			<p>Evidence of attendance and training records from 2025, as well as officially signed and validated contracts, was verified. Salary receipts reflect income and deductions in accordance with the law, and during interviews workers confirmed that they understood their payment conditions.</p>	
<p>6.2.2 (C)</p>	<p>Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members</p>		<p>To verify compliance with the indicator, a sample of employee files was reviewed, requesting documentation from the human resources department such as contracts, pay stubs, attendance records, and vacation requests. The company has indefinite-term and variable-term employment contracts, which include the identification of the parties, purpose of the contract, duration, workplace, remuneration, work schedule, confidentiality provisions, vacation time, and a clause that refers to current labor legislation for any omissions.</p> <p>Pay stubs detail income and deductions in accordance with applicable regulations.</p> <p>Likewise, vacation requests contain the employee's basic information, the requested period, and the corresponding authorizations.</p>	<p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>

			<p>The review of records showed the existence of formalized contracts, documented salary payments, and duly registered vacation requests, in accordance with applicable labor legislation.</p>	
6.2.3 (C)	<p>There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements</p>		<p>To verify compliance with the indicator, a sample of workers and related documentation (resumes, contracts, payment receipts, vacations and attendance) were reviewed.</p> <p>The company uses indefinite contracts of variable duration, which include all elements required by law, such as identification of the parties, functions, duration, salary, working hours, confidentiality and provisions on omissions subject to national labor legislation.</p> <p>Pay stubs detail monthly income and legal deductions, while vacation requests record the period, days requested, area, position, and approval signatures.</p> <p>Documentation signed and approved by the Ministry of Labor was evidenced, as well as salary receipts and vacation forms, confirming the application of established labor procedures.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>

6.2.4 (C)	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure		Agripalma employees living in the Emolve and Villa Clotilde communities benefit from access to electricity, schools, welfare services, and recreational facilities such as a soccer field. The company maintains a housing list to monitor employee residences and identify improvement needs. In Villa Clotilde, notable initiatives include the installation of a treated water access point for community use and the establishment of a designated waste collection area with weekly pickups every Thursday. Documentary reviews confirmed the existence of structured plans and records for housing improvements, while interviews with residents and employees validated the effectiveness of both the water supply system and waste management arrangements.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.		The company facilitates access to affordable food by subsidizing meals provided at the workplace and supporting local markets. Employees can purchase food conveniently near their homes.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.2.6	A DLW is paid to all workers, including		Agripalma calculates prevailing wages	<input checked="" type="checkbox"/> Conform



	<p>those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist</p>		<p>based on base salary and work-related benefits, applying the legal minimum wage of STN 1600 for companies with more than 30 employees. Remuneration follows a proportional system where pay corresponds to the percentage of task completion, with additional earnings for extra work depending on the type of activity. Harvesting tasks, for instance, can yield between 25% and 75% above the basic wage. Since April 2025, updated rates apply: STN 149.60 for harvesting, STN 128.16 for track/circle maintenance and pruning, and STN 116.00 for community cleaning. A worker who consistently completes monthly tasks earns approximately STN 4,448, STN 3,845, or STN 3,500, depending on the assigned activity.</p>	<p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>		<p>Permanent full-time employment is the standard for core work at Agripalma. No casual or temporary labor is used for regular operations, ensuring job security for all employees.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>

Criterion 6.3:

The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such



personnel				
6.3.1 (C)	A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented		<p>The company's induction manual includes information on internal policies and states that all employees have the right to associate and form unions if they so wish.</p> <p>The company's Policies, Procedures, and Plans Manual establish respect for freedom of association and collective bargaining, guaranteeing that employees can join unions without fear of retaliation, intimidation, or harassment.</p> <p>It also states that the company will promote constructive dialogue with employee-elected representatives and will apply disciplinary measures to those who violate this policy. Evidence includes induction attendance records and checklists signed by employees.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request		<p>In August 2024, meetings were held in various departments of the company to elect 20 union representatives and form a five-member union committee.</p> <p>The official document of this election was signed and submitted to the company in early September 2024.</p> <p>During the first half of 2025, meetings were held between management and</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>the union, and the minutes of these meetings were sent to the Ministry of Labor.</p> <p>The topics discussed included salary increases, freedom of association, and disciplinary procedures.</p> <p>The evidence includes memos and internal communications signed by company management and union representatives.</p>	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers		<p>Interviews conducted with workers confirmed that Agripalma does not interfere with the formation or operation of registered unions, labor organizations, or associations.</p> <p>Workers also reported that their representatives are freely chosen without any influence or intimidation by the company.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
Criterion 6.4: Children are not employed or exploited.				
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements		<p>The company has a policy on gender equality, child labor, bribery and corruption, which prohibits forced labor and the hiring of minors under 18 years of age. This policy is also shared with contractors through the Supplier Manual.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>The Induction Manual includes the policy of not hiring minors, which is communicated to workers during their entry.</p> <p>Likewise, contracts for the provision of services with external companies establish clauses that guarantee compliance with the minimum working age, the prohibition of forced labor and the obligation to offer safe and supervised conditions to young workers in case of legal exceptions.</p>	
6.4.2 (C)	<p>There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure</p>		<p>In the review of workers' contracts and files, it is verified that the identity document that proves the person's age is over 18 years old.</p> <p>Furthermore, it was confirmed during interviews with workers and consultation with interested parties that there are no minors working on the plantations or in the factory.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.4.3 (C)	<p>Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.</p>		<p>There is no recruitment of young workers, all workers over 18 years of age, according to the Human resources hiring records and the interview with workers.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live</p>		<p>The company communicates its no-child-labor policy and promotes child protection during employee induction, as well as among supervisors, contractors, suppliers, and communities.</p> <p>The policies are displayed on bulletin boards, and signed training records confirm that these topics have been communicated. This information was verified through interviews and consultations with employees and stakeholders.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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<p>Criterion 6.5: Policies and procedures in place to protect workers' rights.</p>				
6.5.1 (C)	<p>A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce</p>		<p>The company has a document that consolidates its internal policies, including a specific policy against sexual harassment and any other form of harassment or violence in the workplace.</p> <p>This policy establishes a commitment to addressing all complaints seriously, promptly, and confidentially, guaranteeing no retaliation and maintaining a zero-tolerance policy.</p> <p>The company also regularly</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>communicates and disseminates the content of this policy to all personnel.</p> <p>During interviews, employees stated that they were aware of the existence and scope of this policy.</p> <p>Supporting evidence includes records of inductions and awareness-raising activities conducted for different groups of employees, which address the issues of harassment and workplace violence and inform them about the available reporting channels.</p>	
6.5.2 (C)	A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce		<p>Agripalma has formalized its commitment to reproductive rights within its policy framework, pledging compliance with national legislation and international agreements while recognizing employees' freedom to decide responsibly on family planning. Worker interviews confirmed awareness of these policies, supported by documented evidence such as the HR induction checklist (AGR-REG-HSA-001, Rev. 2, 14.08.2024), individual checklists signed by employees, and training records. Notably, a training session held on 22 August 2025 with 18 participants emphasized RSPO policies, including the protection of reproductive rights, demonstrating both policy</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			implementation and employee engagement.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified		<p>The company's gender committee is responsible for identifying the needs of new mothers.</p> <p>In 2025, a diagnostic study was conducted for this group, and the results were presented at a committee meeting.</p> <p>The analysis identified the presence of mothers in different areas of the organization and their distribution according to their stage of motherhood.</p> <p>The study included questionnaires and direct consultations, which helped define key issues related to motherhood and work, as well as proposals for improving the work environment to facilitate work-life balance, well-being, and support for pregnant, breastfeeding, and postpartum mothers.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.5.4	Grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.		<p>The company has an internal procedure for managing complaints and claims, the purpose of which is to ensure that these are handled fairly, impartially, and transparently.</p> <p>Internal complaints are recorded in a database that includes relevant</p>	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>information such as dates, responsible parties, details of the complaint, and proposed solutions.</p> <p>Between September 2024 and August 2025, 23 complaints or requests were received, of which 17 were closed.</p> <p>The verification and follow-up of cases is the responsibility of the Sustainability Department, with support from the CEO's secretary and other involved departments.</p> <p>A non-conformity was raised, as the complaints mechanism is not fully implemented or adequately documented. Inconsistencies were detected in the registration and follow-up, such as incomplete control columns, incorrect closing dates, and discrepancies between parallel records and the dates of communication regarding the progress of the complaint's handling or resolution to the complainant (see details in NC#5).</p>	
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Criterion 6.6: Work is voluntary and specific labor policy and procedures are implemented.				
6.6.1 (C)	All work is voluntary and following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 		<p>The company has a labor policy approved by management in August 2023, which establishes that all work must be voluntary and free, without threats or sanctions.</p> <p>Employees may terminate their contract with prior notice or as stipulated therein, without undue penalties.</p> <p>The policy expressly prohibits practices such as:</p> <p>withholding identity documents, charging recruitment fees, modifying contracts without mutual agreement, imposing non-legal sanctions for resignation, linking work to debt or withholding wages unjustifiably.</p> <p>During the interviews, the workers confirmed that they were aware of this policy.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.6.2 (C)	Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented		<p>There was no evidence of temporary workers, the workers coming from another country are in administrative positions, the labor policy covers all workers.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement





				<input type="checkbox"/> Not Applicable (justification required)
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Criterion 6.7: Appropriate health and safety measures are in place.			
6.7.1 (C)	<p>The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded</p>		<p>Agripalma maintains a structured Health and Safety (H&S) management system with clear roles and responsibilities, including a designated Sustainability Manager and a dedicated H&S department.</p> <p>Regular weekly safety meetings and documented management meetings address occupational risks, accident procedures, emergency preparedness, and adjustments for workers with medical restrictions. Meeting records show discussions on seasonal risks, PPE provision and monitoring, transport safety, and workplace improvements, while staff representatives report on conditions in their areas.</p> <p>Evidence from worker interviews, labor legislation, and internal regulations confirms the company's duty to provide adequate tools and protective equipment. However, an opportunity for improvement was identified, as H&S meeting minutes do not consistently track the status of previously discussed issues, limiting continuity and follow-up on corrective actions.</p>
		<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input checked="" type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)	



<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>		<p>Agripalma has implemented a structured emergency response system that includes documented procedures, trained personnel, emergency kits, and brigade members across facilities to ensure preparedness for workplace incidents.</p> <p>The Emergency and Evacuation Plan for the oil mill outlines evacuation routes, responsibilities, safety instructions, and organizational structures, and is reviewed annually through simulations and shared with authorities.</p> <p>Weekly inspections of emergency kits, induction training, and specialized sessions on first aid, evacuation, chemical handling, and fire prevention demonstrate ongoing preparedness, while accident monitoring and reporting systems ensure compliance with labor requirements and provide traceability of incidents. However, recurrent non-conformities were identified, including the absence of containment dikes in the storage tank area and the lack of emergency kits and transportation in certain field divisions, highlighting areas where improvements are needed to strengthen overall emergency</p>	<p> <input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) </p>
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			readiness.	
6.7.3 (C)	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		<p>Agripalma has established a structured system for managing Personal Protective Equipment (PPE) based on risk assessments and operational needs. The company follows defined procedures for distribution and replacement, ensuring workers receive appropriate gear such as gloves, helmets, rain boots, raincoats, steel toe caps, coveralls, protective capes, and noise protectors depending on their tasks (e.g., harvesting, pruning, factory work, or machine operation). PPE is replaced after six months or when damaged, expired, or lost, without requiring the return of old equipment.</p> <p>Records are maintained to track distribution and compliance, including documented instances of hearing protection provided to drivers and oil mill operators. Additionally, training sessions are conducted to reinforce the importance of PPE use, with participation from dozens of workers, highlighting the company's commitment to safety awareness.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs		Agripalma provides medical insurance to all employees to protect their health	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity



	incurred from work related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection		and financial security in the event of workplace accidents. This coverage reflects the company's commitment to worker welfare and adherence to occupational health and safety standards, as confirmed through employee interviews	<input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics		<p>Agripalma's safety records show that in 2024 the Oil Mill reported 5 lost time injuries with a frequency rate of 53, while the Plantations recorded 46 lost time injuries with a frequency rate of 48, and no fatalities occurred. In 2025, monthly reports highlighted ongoing incidents: May saw 3 accidents and 21 work incidents resulting in 15 lost workdays, while July recorded 6 accidents and 15 incidents with 29 lost workdays.</p> <p>Most cases were linked to unsafe acts or conditions, prompting corrective actions such as strengthening safety measures, increasing employee awareness, and reinforcing the proper use of personal protective equipment to drive continuous improvement in workplace safety.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)

Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment

Criterion 7.1:
IPM plans are implemented and monitored to ensure effective pest control.

7.1.1 (C)	IPM plans are implemented and monitored to ensure effective pest control.		<p>Agripalma has a formal Integrated Pest and Disease Management procedure (AGR.600, version 03, approved in October 2023) that defines detection, prevention, and control measures for Fusariose, Oryctes sp., Ganoderma sp., and rats. Case registration is based on field observations, and no other pests have been identified beyond those listed. Current management activities focus mainly on Ganoderma and rats.</p> <p>For Ganoderma, annual phytosanitary rounds are conducted using a checklist to classify palms as normal, unproductive, diseased (from 2024 or 2025 analyses), or removed/empty. Records from 2024–2025 show that about 390 hectares of section 1 were analyzed, with 74 palms identified with Ganoderma and 221 unproductive palms. Some blocks remain under review, and blocks A2, PP, and PM showed increases in diseased palms compared to the previous year. Interventions include removal of diseased and fallen palms, followed by</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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			<p>removal of unproductive palms.</p> <p>Rat control is carried out with bamboo traps across the plantation, and natural predators such as snakes and falcons are encouraged to support biodiversity. As Agripalma cultivates organic palms, only physical control methods are used, with no chemicals or fire. In line with procedure AGR.08, Oryctes sp. control is limited to palms under three years of age.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p>		<p>Direct observation during the audit field visit interview as well with the plantation team established Agripalma has not introduce any invasive species as referenced in the Global Invasive Species Database and CABI.org apart from Mucuna and Pueraria spp as cover crops to provide nitrogen fixation in the soil, weed control and increase organic matter in the soil. Both Mucuna and Pueraria are creeping plant and can spread beyond it boundaries, hence regular maintenance by slashing is done to prevent them from spreading outside the boundaries of Agripalm plantation. Direct observation during field visit established the species and maintained and have not spread beyond it boundaries.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>

7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with ap prior approval of government authorities. [For NI to define process]		It was evident from interview conducted with the plantation manager, phyto team and direct observation that fire is not use for pest control. This is in compliance with the procedure “AGR.010 - Procedimento Operacional Padrão - Departamento Plantação” (Version 04).	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.				
7.2.1 (C)	Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.		Not applicable, Agripalma is Organic Certifed, hence there is no use of pesticide apart from mineral fertilizer applicable which is acceptable under organic certification.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.2 (C)	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.3 (C)	Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity

				<input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless unexceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application 7.2.5</p>		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)



	e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.			
7.2.6 (C)	Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.7 (C)	Storage of all pesticides is in accordance with recognised best practices.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.9 (C)	Aerial spraying of pesticides is prohibited,		Not applicable as captured in 7.2.1	<input type="checkbox"/> Conform



	unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		above.	<input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.10 (C)	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.2.11 (C)	No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.		Not applicable as captured in 7.2.1 above.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)

Criterion 7.3:

Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner



7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		<p>Agripalma has a waste management plan (Plano de Gestão de Resíduos, version 1.0, dated 08 January 2020) designed to reduce environmental impacts in line with its Environmental Management Plan. The objectives are to manage waste at the source, generate profit where possible through waste sales, and reduce production waste to lower costs.</p> <p>A central waste facility aggregates and sorts all non-household waste, including used batteries, filters, electronic waste, oils, tyres, scrap metals, and chemicals. Hazardous and industrial waste is contracted to ZEAL Environmental in Ghana for collection, shipment, treatment, and disposal under the Basel Convention, with services scheduled to begin in 2026 once legal matters are finalized. Household waste is weighed and sent to the municipal centre, with 2025 records confirming waste delivered to the centre.</p> <p>Certain wastes are reused or repurposed: tyres are donated to the community for fencing or horticulture under controlled conditions; empty fruit bunches (EFB) are returned to plantations as organic fertilizer; fibre is</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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			used in boilers to generate steam; kernels are applied in road construction; and palm oil mill effluent (POME) is treated in lagoons with no discharge into the environment.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		Agripalma has established a structured Waste Management Procedure (AGR-RSPO-02208, version 0.2) that identifies the types of waste generated and outlines measures for responsible disposal. Evidence from audits shows that the company actively implements its waste and pollution management plan through trainings, toolbox talks, and record-keeping. In addition, Agripalma has developed a renewable energy plan aimed at reducing mill waste by using fibre and kernel shells to generate electricity for internal consumption, with surplus power exported to the national grid. The HSE team conducts regular inspections under the Plano Anual Inspeções HSA 2025, documenting nonconformities, corrective actions, and compliance status. Between January and July 2025, 177 waste-related noncompliances were identified, most successfully resolved, with 17 pending corrective measures. Inspection checklists confirm compliance with standards such as accessibility,	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>chemical compatibility, container integrity, signage, and odor control.</p> <p>Training sessions held in June and August 2025 for plantation and mill workers further reinforce responsible waste handling. Interviews and site visits validated that waste is being managed effectively, with no evidence of indiscriminate disposal.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.		<p>Reference to procedure waste management procedure <i>AGR-RSPO-02208 Procedimento para Gestão de Resíduos</i>, version 0.0, Agripalm does not fire for waste management. With the exception of Household waste which are collected and sent to the municipal waste centre, all other wastes are currently stored at the waste center as detailed in 7.3.1 above.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
<p>Criterion 7.4: Practice maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>				
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.		<p>Agripalma has formalized its Good Agricultural Practices (GAP) through the <i>Procedimento Operacional Padrão (AGR.010, Version 4.0, dated 7 July 2023)</i>, which sets standards for plantation operations including pruning, manual circle maintenance, weed</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>eradication, pest control, and use of personal protective equipment. Fertilization practices are defined in AGR.402 (15 March 2024), covering fertilizer types, sampling and analysis, application quantities, methods aligned with SOCFIN requirements, and environmental safeguards such as buffer zones.</p> <p>The fertilization plan introduced phosphorus application in early 2024, improving cover crop development and soil nitrogen levels, confirmed through leaf analysis. Since 2024/25, potassium and phosphorus applications have been implemented. Additional practices include arranging cut palm fronds in “U” shapes to reduce erosion and return organic matter to the soil, as well as manual weeding and cover crop cultivation. These measures, established in harvesting procedure AGR.500 (10 April 2024), support soil conservation and fertility.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.</p>		<p>Soil analysis is conducted every 5 years and 20% done annually to cover the entire plantation in the 5 year.</p> <p>Soil analysis is conducted by SoGB a subsidiary of the Socfin group. The last analysis was conducted in 12/02/2025</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p>



			with sampled picked from blocks C2, D2, H3, K2 and L3. The plantation is blocked into 28 sampling plots and 20% is collected for soil analysis while for leave analysis is collected from all the sample plots. Evidence was sighted of 2024 report, based on the report, there is lack of potassium in the soil, hence the application of potassium, palm fronds and EFPs (no nitrogen since that is banned by organic certification).	<input type="checkbox"/> Not Applicable (justification required)
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.		Agripalma has an EFB application plan to cover 500 hectares with empty fruit bunches, fibre, and palm kernel over three years ending in 2025, with a minimum of 30 tons per hectare. Monitoring shows 171.6 hectares treated in 2024 with 5,748 tons (33 t/ha) and 84 hectares treated from January to July 2025 with 3,095 tons (37 t/ha). Palm oil mill effluent (POME) is currently stored in lagoons, with future plans for field application	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.4.4	Records of fertiliser inputs are maintained.		Agripalma, being fully organic, applies only mineral fertilizer permitted under organic certification, specifically Kalimop/Kali gran (muriate of potash). Fertilizer use follows the operational plan AGR.010 (Version 4.0), with records maintained in the ADOBO IPI Epandage	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>file for 2024/25. The plan requires 1 kg per palm applied twice yearly, in January/February and July/August.</p> <p>In 2024, 269,741 palms received a total of 260,600 kg of fertilizer, averaging 0.97 kg per palm. In 2025 (January–July), 245,616 palms received 250,850 kg, averaging 1.02 kg per palm.</p>	
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils</p>				
7.5.1 (C)	Maps identifying marginal and fragile soils, including steep terrain, are available.		<p>A soil map dated 1960 and prepared at a scale of 1:50,000, is available for reference. The HCV assessment report dated Nov. 2020, provides a detailed description of the topography across the concession areas managed by Agripalma. Figures 6-3 through 6-7 of the report, illustrate the distribution of soil types, typical land cover, slope characteristics, and elevation zones. 2 dominant soil types are identified in the concession namely; humic andosols and humic nitosols. Importantly, the HCV report does not indicate the presence of fragile soils or peatlands within the concession areas, confirming that such sensitive soil categories are absent from the plantation's operational landscape.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



7.5.2	There is no extensive replanting of oil palm on steep terrain.		<p>The audit field visit and direct observation comprehend the LUCA report that mentions that no oil palm was planted on slopes above 25 degrees as per the RSPO guidelines. Reviewed “LUCA Analysis Verification Result Document RSPO FOR SOCFIN SA – AGRIPALMA”, version 4, issued on 08/11/2021”.</p> <p>Where slopes planting is done on slope above 10 degrees, terracing is applied. This was evident in parcel 410.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.5.3	There is no new planting of oil palm on steep terrain.		Not applicable as there are no new plantings.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)

Criterion 7.6:

Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.



7.6.1 (C)	To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils including steep terrain, are taken into account in plans and operations.		<p>Agripalma's plantation has not been classified as having fragile soils, but a soil map from 1960 at a 1:50,000 scale is available, and the company has identified the soil types within its concession. Measures to minimize soil alteration risks are outlined in the Environmental, Social, Health and Safety Plan (2023). Regular soil analyses are conducted to monitor changes in organic matter and detect pollutants.</p> <p>Erosion control practices include arranging cut palm fronds in a "U" shape to reduce erosion and return organic material to the soil, as detailed in procedure AGR.500 (Version 0, dated 10 April 2024). Manual weeding and cover crop cultivation are also applied, contributing to soil conservation and fertility as part of routine operations.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.		<p>As mentioned, marginal and fragile are no identified in Agripalma plantations. Sao Tome is noted for high rainfalls which may cause erosion is some instance. Hence the cultivation of cover crops, manual weeding and use of cut palm fronds in 'U' shape is applied as measures to prevent soil erosion.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure		There is currently no new infrastructure development, irrigation, planting, replanting, or road construction taking place, and the company has not planned any such activities. Interviews and a review of documentation confirmed that the company possesses the resources and information necessary to implement these tools if required in the future. The plantation is situated in a mountainous area, where road maintenance activities are regularly carried out. Most of these maintenance works are performed manually, with stones placed along the road and pouzzolane material applied to stabilize and reinforce the road surface.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.				
7.7.1 (C)	There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.		Soil analysis conducted as part of Agripalma HCV assessment has not identified the presence of Peat soil with the plantation blocks. Hence there are no plantations established on peat. Furthermore, there is no evidence of new plantation established by Agripalma.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to		As mentioned, the presence of peat soils has not been identified in Agripalma plantation. Hence, Agripalma has	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity



	RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		reported it No Peat inventory to the RSPO via email dated 21/11/2022 <i>RSPO_Peat_Inventory_Template_ amended</i> . The email exchanges between SOCFIN RSPO Africa Certification Manager and the RSPO Secretariat dated 21 November 2022 was sighted and reviewed.	<input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.7.2 (C)	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).		As mentioned, the presence of peat soils has not been identified in Agripalma plantation. Hence not applicable	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.7.3 (C)	Subsidence of peat is monitored, documented and minimised.		As mentioned, the presence of peat soils has not been identified in Agripalma plantation. Hence not applicable	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.7.4 (C)	A documented water and ground cover management programme is in place.		As mentioned, the presence of peat soils has not been identified in Agripalma plantation. Hence not applicable	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



				<input checked="" type="checkbox"/> Not Applicable (justification required)
7.7.5 (C)	<p>For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the time frame for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders,</p>		As mentioned, the presence of peat soils has not been identified in Agripalma plantation. Hence not applicable	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)

	<p>smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG. PROCEDURAL NOTE: PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]</p>			
7.7.6 ©	<p>All existing plantings on peat are managed according to the '<i>RSPO Manual on Best Management Practices (BMTs) for existing oil palm cultivation on peat</i>', version 2 (2018) and associated audit guidance.</p>		<p>As mentioned, the presence of peat soils has not been identified in Agripalma plantation. Hence not applicable</p>	<p><input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)</p>
7.7.7 (C)	<p>All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new</p>		<p>As mentioned, the presence of peat soils has not been identified in Agripalma plantation. Hence not applicable</p>	<p><input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity</p>

	<p>drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version2 (2018) and associated audit guidance.</p>			<p><input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)</p>
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<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>				
<p>7.8.1 (C)</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a. The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1 b. Workers have adequate access to clean water</p>		<p>Agripalma has a water management plan for 2025–2026 that outlines its strategy for sustainable use, conservation, and protection of water resources. The plan ensures compliance with legal requirements, aligns with international best practices, and integrates into the company's broader sustainability framework. Water is sourced from the Mióba River and Vila José Spring and is used across the plantation, factory, offices, workshops, and residential housing for both industrial and domestic purposes.</p>	<p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>



			<p>To safeguard community access and prevent pollution, Agripalma contracts QHSE Consulting to conduct independent water quality testing. These analyses cover drinking water, river samples upstream and downstream, and effluent ponds, assessing both physicochemical and bacteriological parameters. A diagnostic report from March 2025 confirmed compliance with standards, except for nickel levels, which were outside reference values but not linked to Agripalma's operations.</p> <p>The company holds authorization from the National Water Institute (INA) to draw water from the Mióba River, with agreements signed in February 2024 and evidence of payments for water use through 2024 and 2025. To ensure workers have reliable access to clean water, Agripalma also sources treated water from EMAE, the national provider, through a third-party supplier, with invoices confirming supply in July 2025</p>	
7.8.2 (C)	Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April		Based on LUCA conducted and received a PASS from the RSPO dated 8/11/21, Agripalma has declared 24.8 ha of riparian areas for remediation in accordance with the <i>RSPO Manual on Best Management Practices (BMPs) for</i>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



	2017).		<p><i>the Management and Rehabilitation of Riparian Reserves</i> as country guidelines are non-existent. It adopted the width referenced in chapter 2.2.1 of the said guidelines. Furthermore, the company has established a buffer zone management plan captioned.</p>	<input type="checkbox"/> Not Applicable (justification required)
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>		<p>Agripalma treats mill effluent using engineered aerobic and anaerobic ponds, with a retention pond ensuring no discharge into the environment or land application. Wastewater is analyzed quarterly by an independent laboratory, with recent results showing some parameters above reference values. However, the water remains contained within treatment basins, preventing environmental release.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p>		<p>Agripalma sources water from the Mioba River for its mill activities based on agreement signed with the Ministry of Infrastructure and Natural Resources National Water Institute (INA) dated 19/02/2024. The company has installed a flow meter for the purpose of monitoring water drawn from the river. There is also a flow meter installed to monitored water send to the mill to</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>produce FFB. Daily monitoring is done and further translated to monthly and annual report for water use per FFB produced.</p> <p>Agripalma has budgeted its water use per tonne of FFB as 1.3 m³/t FFB. Reviewed Reporting_POM_AGRIPALMA_2024 that records monthly volume of water use as against FFB proceed from January to December 2024. The report showed an average of 1.15 m³/ton FFB demonstrating efficient water use at the mill.</p>	
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewal energy is optimized.</p>				
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.		<p>Agripalma has implemented its Plano de Eficiência Energética 2025–2026, aimed at improving fossil fuel efficiency, optimizing renewable energy use, and ensuring proper monitoring. The company's energy demand covers workshops, offices, the industrial plant, housing, vehicles, and steam production. Since it is not connected to the national grid, power is supplied by four diesel generators serving the mill, offices, and nearby host communities.</p> <p>To enhance efficiency, Agripalma maintains records of IT equipment to</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>ensure energy-efficient replacements, inspects electrical panels and installations, and has invested in LED lighting across facilities. Production equipment is managed through regular maintenance, shutting down engines and machines when not in use, and repairing compressed air leaks. Transport efficiency is supported by routine vehicle maintenance, timely repairs, and replacement of outdated machinery, with fuel use monitored per ton of production.</p> <p>Fuel consumption reports show progress: in 2023, generator use was 158,247 liters at 3.61 kWh/l, while in 2024 it dropped to 142,974 liters with improved efficiency at 3.78 kWh/l, reflecting reduced fuel use and increased power output. Maintenance records for generators and tractors confirm ongoing upkeep, and workers received sensitization training on energy savings in May 2025.</p> <p>On renewable energy, turbine investment proved unviable but mill by-products such as kernel and fibre are used in boilers to generate steam for sterilization.</p>	
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Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions				
7.10.1 (C)	GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.		<p>Agripalma has identified its emissions sources and reported that in the RSPO Palm GHG v4. Link to Agripalma POM Palm GHG calculation for 2024 was submitted and reviewed against the relevant data source during the audit and was approved.</p> <p>Furthermore, Agripalma publicly reports together with other SOCFIN subsidiaries. The 2024 report for Agripalma on Net Emission (TCO₂ e/T palm product) in the case of Agripalma POM was finalized as of the time of the audit by Group Socfin. However, 2023 figure was published on the group website: https://socfin.com/wp-content/uploads/2024/05/2023-Socfin-Sustainability-report_LD.pdf</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.10.2 (C)	Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).		There is no new planting currently in Agripalma plantations. The last planting has been developed in 2014.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



<p>7.10.3 (C)</p>	<p>Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>		<p>Agripalma POM monitors ambient air quality and stack emissions annually through QHSE Consulting SARL. The June 2025 diagnostic report assessed combustion fumes from boilers and generators using a multi-gas analyzer, and airborne dust using a multifunctional air analyzer. Results showed most fume parameters within limits, except TPS values, which exceeded reference standards. Air quality analysis indicated that 75% of site points had PM10 levels above limits, likely influenced by diesel exhaust and weather conditions, though no explosive risks were detected.</p> <p>Recommendations included regular maintenance of smoke filtration systems, installation of aerators in fuel storage and laboratory areas, and use of masks by personnel in non-compliant zones. Evidence of equipment maintenance records and a structured maintenance program was reviewed, along with driver training aimed at reducing dust through speed control.</p> <p>Noise monitoring conducted in June 2025 found tractor and mill areas exceeding the acceptable 66 dB level. Workers were observed using PPE such as earplugs and earmuffs to mitigate exposure.</p>	<p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>
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			Training sessions on air quality and noise pollution were also provided, with evidence of worker participation in May 2025.	
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Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area.				
7.11.1 (C)	Land for new planting or replanting is not prepared by burning.		Socfin Group has a zero-deforestation policy including no use of fire for land preparation. Review of Agri SOP captioned AGR.010 - Operacional Padrão_signed Rev 04 there are no immediate plans to expand palm plantations, however if Agripalma plans to expand its plantation in the future, it will be required to comply with the RSPO New Plantation Procedure.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.		Agripalma has an emergency plan (Memoria Descritiva do Plano de Emergencia Agripalma) that outlines evacuation routes, fire extinguisher and hydrant points, first aid stations, assembly points, and alarm systems. At the mill and offices, 18 fire extinguishers are installed and inspected annually, and 10 hydrant points are available for fire response. A dedicated fire emergency team is in place, trained through drills and sessions provided by the National Fire Department of São Tomé and a security company. Evidence shows 11 days of training in fire prevention, firefighting, evacuation, and first aid, with 24 participants.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>At the plantation level, fire is considered low risk due to the humid climate and rainfall in the Caué district. Ecoguards patrol high conservation value areas and monitor for fire outbreaks, with no incidents reported to date.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p>		<p>Fire has not been identified as high risk for Agripalma due to the high humidity and rainfall pattern in the Caue district where the company is located. However, the company continue sensitize its neighbouring community and fire control and prevention. The sensitization is done as part of the company's meeting with the communities. Evidence was sighted of meeting held on 18/12/2024 at Praia Pesqueira community. Topic diccussed as the meeting include;</p> <p>Fire Prevention R Responses to Complaints and Claims, Company Expectations for the Community, The company's role in these expectations External Communication Procedure</p> <p>Similarly, Fire awareness poster has been pasted on the community notice boards</p>	<p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>
<p>PROCEDURAL NOTE for 7.12</p>				



The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.

The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems. High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.

Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).

The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.

Criteria 7.12:

Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

7.12.1 (C)	Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.		Agripalma has not cleared any new lands since 15 Nov. 2018. The plantation has been in existence in 2005 with no HCV conducted during the period. Subsequent Socfin SA acquisition of operations African and incorporating into its membership in 2019, a historic LUC was conducted. The LUCA report captioned <i>LUC Analysis Verification Result Document RSPO FOR SOCFIN SA - AGRIPALMA</i> covered the total management area of 2400.3 Ha. The LUCA has received a PASS following RSPO review dated 08/11/2021. The report concluded with 24.8 Ha Environmental Remediation (Riparian Area Remediation) and 452.44 Ha Final	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
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			Conservation Liability.	
7.12.2 (C)	<p>HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>		<p>Agripalma carried out an independent High Conservation Value (HCV) assessment in November 2020, conducted by HCV Africa, covering its plantation in São Tomé. The concession area totals 4,917 ha, of which 2,100 ha in management units Título 409 and Título 410 are planted with oil palms. Other areas within the concession remain unexploited, with some used by local farmers, and negotiations are ongoing with the government regarding their future use.</p> <p>The assessment focused on 3,650 ha that includes the planted area and surrounding land. It identified the presence of HCV 1, 2, 3, 4, and 5, while HCV 6 was absent. The mapped values show significant conservation importance: HCV 1 (1,620.7 ha), HCV 2 (1,642.67 ha), HCV 3 (1,415.05 ha), HCV 4 (671.8 ha), and HCV 5 (807.28 ha). Taking overlaps into account, the total HCV area within the concession is</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			2,144.41 ha. The report also provides detailed recommendations for threat management and monitoring to safeguard these conservation values.	
7.12.2 b)	Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		Not applicable, Agripalma as not cleared any new lands within its management unit apart from replanting that took place from 2014 – Feb 2019.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)
7.12.3 (C)	<p>In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE for 7.12.3: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a</p>		N/A, 7.12.2 as detailed above is applicable.	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required)



	<p>balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p>			
<p>7.12.4 (C)</p>	<p>Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>		<p>Agripalma has developed a management plan (Plano de Gestão das áreas de alto valor de conservação – HCV 2023) to implement the recommendations of its High Conservation Value study. To safeguard identified HCV areas, the company employs an Eco Guard team of four staff who patrol the concession, including buffer zones established along the border with the São Tomé Ôbô National Park.</p> <p>The Eco Guards are trained in database management and GPS use to record and analyze field evidence, with training conducted in June 2023. Weekly patrol reports and camera records from January to July 2025 confirm ongoing monitoring.</p> <p>As part of its broader conservation and compensation strategy, Agripalma partners with the Gulf of Guinea Islands Biodiversity Center (CBGG) to monitor biodiversity in riparian areas under ecological restoration. This collaboration focuses on vegetation and birdlife</p>	<p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>

			<p>indicators while also building internal capacity by training Agripalma staff. The most recent monitoring report reviewed covered July 2024 to March 2025.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>		<p>Agripalma HCV assessment identifies HCV5 as the only social HCV with HCV 6 identified as absent. These HCV includes the recharge of water bodies through the presence of rivers, the availability of fish that form part of the daily diet, and the use of natural resources for building and toolmaking. This was identified as a result of the audit stakeholder consultation as detailed in Appendix 2 of the HCV report.</p> <p>Agripalma supports these rights by providing potable water for human consumption in the communities, protecting water bodies by avoiding the discharge of pollutants, and supplying housing for its workers, which eliminates the need to extract construction materials from the forest. In addition, the creation of Ecoguards reflects the company's commitment to protecting natural resources and forests, while actively involving the community in conservation efforts.</p> <p>The is no evidence to established that this HCV has been reduced as result of Agripalma operation.</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>



7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>		<p>Agripalma's HCV assessment highlighted 30 species of concern within its concession, 17 of which are listed by the IUCN as threatened with extinction. These species are concentrated in the moist lowland forests of the southwest. Pressures on biodiversity include hunting of animals such as pigs, monkeys, civet cats, bats, and birds, as well as ecological impacts from logging, charcoal production, slash-and-burn practices, sedimentation, and fragmented riparian buffers.</p> <p>To address these challenges, Agripalma has deployed an Eco Guard team to patrol and protect HCV areas and partnered with BirdLife to deliver five-day training programs that strengthen conservation practices and community engagement. Monitoring confirmed no evidence of workers or community members harming or trading rare, threatened, or endangered species. The company enforces strict disciplinary measures to ensure compliance with biodiversity protection standards.</p>	<p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p>



7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.		As mentioned, Agripalma has instituted EcoGuards with the role of patrolling and monitoring the HCVs areas. Their report and actions recommended are immediately implemented. The HCV management plan is updated every year, with last update in 2023. However, on yearly basis, Agripalma hold management review, where all operational activities are reviewed including outcome of HCV monitoring. Based on the monitoring result for the year, and if any amendment is required, this is done without to wait for the next update which is in 5 years. Actions to be taken is then updated in the continuous improvement plan. Reviewed the last management review dated September 2024 and update made in the continuous improvement plan captioned HSA-FG-0002 PLANILHA DE ASPECTOS E IMPACTOS/PLANO DE MELHORIA CONTÍNUA.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.12.8 (C)	Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.		Agripalma's Land Use Change Analysis (LUCA) determined that 1,318.18 hectares were converted between 2005 and 2019, with most of the conversion occurring between 2010 and 2014. The LUCA established a final conservation liability of 452.44 hectares, which was	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input checked="" type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)



			<p>formally approved by RSPO in November 2021. In response, Agripalma submitted a Remediation and Compensation Plan (RaCP) in November 2022, and the project began in August 2023 following agreements with BirdLife International and CBGG.</p> <p>The compensation plan commits USD 1,130,325 over 25 years to conservation efforts, including support for the Obô Guardians initiative, which engages local communities in biodiversity monitoring and awareness. Activities focus on surveillance patrols, community sensitization, and record-keeping of conservation actions. Oversight is provided by CBGG, ensuring transparency and stakeholder involvement.</p> <p>For the review period August 2024 – August 2025, Agripalma reported progress to RSPO. Buffer zones in riparian areas have been demarcated and protected, with plans to plant native tree seedlings. Ecoguards patrol regularly to prevent illegal activities, and quarterly water quality monitoring is conducted. In the Obô Natural Park, patrols and community engagement continue, supported by ongoing reporting and</p>	
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			<p>documentation.</p> <p>Email from the RSPO dated 25 August 2025 at 07:39 acknowledging receipt of the Annex 9 for SOCFIN SA (Agripalma) for review was sighted.</p> <p>The audit team has arrived on opportunity for improvement to follow-up and monitor plan in subsequent audit (see OFI #8).</p>	
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6. Summary of Audit Findings

6.1 Positive and noteworthy findings

No.	Positive finding
1	RSPO Commitment from ground staff to the entire work force is highly impressive
2	Good implementation and monitoring of BMPs at the plantation level by the agricultural team
3	Transparency
4	Availability of ground staff during audit
5	Management Commitment



6.2 non-conformities and opportunities for improvement

Summary of nonconformities and opportunities for improvement under the RSPO Principles & Criteria				
Principle	Major	Minor	Opportunities for Improvement	Total No Findings
Principle 1: Behave Ethically and Transparently	0	0	1.1.4 C	1
Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction.	2.1.1 (C)	2.1.2	0	2
Principle 3: Optimise productivity, efficiency, positive impacts and resilience (<i>Includes IP and/or MB Module</i>)	3.6.2 (C)	0	0	1
Principle 4: Respect Community and Human Rights and Deliver Benefits	0	0	0	0
Principle 5: Support Smallholder Inclusion	0	0	0	0
Principle 6: Respect Workers Rights and Conditions	6.7.2 (Minor Upgraded to major)	6.5.4	6.7.1C	3
Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment	0	0	7.12.8C	1
Certification Systems Document	0	0	0	0
Total	3	2	3	8



7. Nonconformity(ies) Issue in this Audit

Indicator Number	2.1.1C
Nonconformity Number	2
Nonconformity Category	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
Recurring Nonconformity	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date of Nonconformity Issued	29.08.2025
Nonconformity Issued To (<i>when more than one site/member</i>): N/A	
Deadline:	<input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting
Mode of Nonconformity Closure	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
Standard Reference	RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 The unit of certification complies with applicable legal requirements.
Nonconformity Statement: The company fails to meet certain legal requirements: - 100% of the workers interviewed in Division 409 (Block J8/7) and Division 410 (Block AD/02), who perform maintenance activities such as circular cleaning, use machetes purchased by themselves. The company was unable to demonstrate that the workers received these tools free of charge, as although it maintained a general record of tool output from the warehouse, there is no record of individual deliveries. This situation does not comply with the National Labor Code or the company's internal regulations.	
Evidence: <ul style="list-style-type: none"> • Interviews with field workers (maintenance) • Labor Code (Law 6/2019, Article 5/Paragraph c): "Work tools must be provided primarily by the beneficiary of the activity or by someone designated by him/her." • Internal work regulations. Article 6. Company duties. Paragraph i: "Provide all work materials of the necessary quality and quantity to workers free of charge." 	
Root Cause Analysis	Using the 5-Why methodology, review of current controls in place and interviews with coworkers to understand driving behaviors, the following root causes are identified: Although the company has never denied workers access to machetes needed for their tasks, supervisors did not verify



	<p>or control the source of the machetes used by the women in maintenance. This gap occurred because no grievances were reported by workers and, due to cultural practice, women commonly carry their own machetes. As a result, distribution for maintenance staff was not managed with the same level of control as for other field functions.</p>
Correction(s)	<p>Distribute machetes to all maintenance workers.</p> <p>Create distribution log per groups with machetes assigned to the total of employees in each maintenance group.</p>
Corrective Action Implemented <i>(including any evidence submitted)</i>	<p>The company will standardize machete distribution for all functions in plantation requiring it as a work tool, including maintenance.</p> <p>Supervisors will be required to record and control the issuance of machetes, per group of workers per team. Daily distribution shall be confirmed with n° of team members in the field per group.</p> <p>Update plantation SOP to describe distribution of required work tools for free and periodicity of distribution as per type tools for plantation.</p> <p>Provide training on updated procedures.</p> <p>Conduct annually internal audit to confirm compliance with procedure.</p>
Date of Response	21.09.2025
Audit Team Conclusion <i>(including any evidence reviewed)</i>	<p>Correction and corrective actions reviewed and approved (22.09.2025).</p> <p><u>The company presented evidence of the implementation of corrections and corrective actions, which were reviewed:</u></p> <p>1. Records of the delivery of machetes were presented, using the Daily Tool Record Format. Code: PLA.01. Revision 00. 2.10.2025. It consists of: section, date, storage location, tool name, equipment code, output quantity, return quantity, condition (good/damaged), output/input time, returned by.</p> <p>The records show delivery of machetes on 16,20,21.10.2025 to the personnel of sections 1, 2, 3 and 4.</p> <p>Example:</p>



	<p>Date: 10.21.2025</p> <ul style="list-style-type: none"> - Storage location: office section 2. - Tool: Machete. - Equipment code 211, - Departure quantity: 12, - Return quantity: 12, - Condition: good, - Entry/exit time: 7am/3pm. - Returned by: Ricardo <p>2. Photographic records of the delivery of the machetes to the agricultural maintenance personnel.</p> <p>3. Agripalma socialized internal communication No.40/2025. Code: RH.00.12.05.2021. Subject: Machete distribution process.</p> <ul style="list-style-type: none"> → In this statement, all collaborators are informed that this tool will be delivered only to those who use the machete as a work tool, it will be delivered every 6 months (January and July). → It is clarified in the statement that delivery priority will be given to the agricultural maintenance group and that next year (2026) it will be carried out simultaneously to all the plantation groups. → It is also reported that in case of damage, a new machete will be delivered after the damaged machete is returned. → The foremen will be responsible for distributing and storing the machetes daily and it is prohibited to take this tool home; these must be kept in the offices of each section. <p>4. Standard operating procedure. Code: AGR.010. Version 5. 10/15/2025. Objective: Establish operational criteria and standards for the Agripalma Plantation Department Provide training on updated procedures. The plantation's standard operating procedure was updated to describe the free distribution of the required work tools and the periodicity of the distribution according to the type of tools for the plantation.</p> <p>5. Training record was evidenced. Code: RG.01. Revision 06. 01/30/2025. Training topic: Update of the Standard operating procedure. Code: AGR.010. Date: 10/22/2025 (Participants: 6 / technicians and managers).</p> <p>6. Training record was evidenced. Code: RG.01. Revision 06. 01/30/2025. Training topic: New delivery and return process for machetes.</p>
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	<p>Date: 8.10.2025 (Participants: 8 / technicians, occupational health and safety coordinator, infrastructure technician and Director).</p> <p>Date: 10/16/2025 (Participants: 99/ Maintenance operators and foreman).</p> <p>Date: 10/17/2025 (Participants: 108/ Maintenance operators, foremen, cutters, loaders and assistants).</p> <p>Date: 10/20/2025 (Participants: 37/ Maintenance operators).</p> <p>7. During the training records, a guide called: New process for lifting and returning machetes was delivered. Objective: Ensure everyone understands the new machete control system. In addition to that, reduce losses, ensure daily returns, increase discipline and organization. The guide includes: lifting, use during the day, advantages of the process and photographic images of the delivery and how to store the machetes. The guide emphasizes that correct use is mandatory and literally says: Do not carry the tool on your body, do not place it in your pocket, on your waist, inside your boots, or in any part glued to the body.</p> <p>8. To confirm compliance with this procedure, the annual audit plan was presented. Code: SGQ.09. Revision 00. 01/05/2024. Program 2026. Its last update was on 10/27/2025. The program consists of the procedure/process number to be audited, area to be audited, auditor, scheduled date and observations.</p> <p>9. According to the Program, it is estimated to audit the plantation standard operating procedure in the month of January 2026.</p> <p>Based on the evidence presented, it is concluded that the company has implemented the proposed corrections and corrective actions, and therefore this non-conformity is closed.</p>
Status of Nonconformity	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
Date of Closure:	5.11.2025



Indicator Number	2.1.2
Nonconformity Number	3
Nonconformity Category	<input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity
Recurring Nonconformity	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date of Nonconformity Issued	29.08.2025
Nonconformity Issued To <i>(when more than one site/member):</i> N/A	
Deadline:	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
Mode of Nonconformity Closure	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
Standard Reference	<p>RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018</p> <p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p>
<p>Non-Conformity Statement:</p> <p>Legal noncompliance by some contractors is evident.</p> <p>Although the company conducts due diligence with subcontractors, the following non compliances were identified:</p> <p>Djay (Field and industrial service provider)</p> <ul style="list-style-type: none"> - The workers' compensation insurance, dated August 13, 2024, to August 12, 2025, which covered 40 anonymous workers, was reviewed. The latest renewal is from August 13 to December 31, 2025, and covers 30 anonymous workers. However, the list of field workers was presented, and to date, this list includes 41 field workers and 2 plant workers. - The legal department audited this company on January 23, 2024, and identified four non-compliances, with a deadline of July 2024 (the workers did not have employment contracts and were not registered with Social Security). <p>On May 16, 2025, this company underwent a new audit, identifying five non-compliances, with a deadline of June 27, 2025 (the company did not have an updated employee roster, had pending contracts for some of its workers, had pending Social Security registrations, and the Social Security clearance certificate and the tax clearance certificate, which were also pending, were presented to the auditor during this audit).</p>	



Note: Agripalma conducts due diligence on legal compliance with this subcontractor every 16 months.

Scale worker (A.D.E.S)'s contract.

The document states a start date of November 22, 2022, for an indefinite period, but the contract was signed on August 5, 2025, which is the actual start date of the activities, as confirmed by the subcontractor's representative (inconsistent document).

At this time, the worker is not registered with social security.

Furthermore, the objective of the contract is to work in the field, not in the factory, in the scale area (which is where the worker was interviewed, and it was determined that this is her actual activity).

Socogesta (Private Security Service)

- Contract signed in March 2023. The company was founded in 1994 as a legal consulting and project evaluation firm. It holds a private security license issued by the General Commander of the National Police in October 2024, which is not the competent authority to grant authorization for the inclusion of this new business purpose.

- There is no proof of updating the registered business purpose with the entity responsible for business registration (SINGLE WINDOW FOR COMPANIES), only an internal record. As a control measure, Agripalma annually requests a certificate of no social security and tax payments.

- The company asks the contractor's employees whether they have received their monthly salary verbally. There is no monitoring to ensure that their current social security status remains valid.

M.M.D (Cafeteria Food Supplier).

The cafeteria is located within the factory. This service provider is not a legal entity and does not have a business license.

She does not have a social security plan for herself or her two employees.

Evidence:

Root Cause Analysis

Using the 5-Why methodology, review of current controls in place and interviews with coworkers to understand driving behaviors, the following root causes are identified:

Although the procedure for contract management includes criteria for conducting annual audits of subcontractors, the specific criteria to verify legal compliance were not clearly defined. In addition, while the procedure provides general guidance for managing all types of contracts, it does not fully differentiate or strengthen the control mechanisms according to the varying risk levels associated with subcontractor activities. As a result, the level of control may not be fully adequate for subcontracted work

Correction(s)

Obtain updated list of employees for subcontractors' workers, verify that all have contracts and are enlisted in Social Security. Verify suitability of work accident insurance



	<p>vs n° of employee. Close open non-conformances from last audits conducted.</p> <p>Ensure correct work allocation and workstation as per subcontractors' contracts – updated workers list with task and sector allocation</p> <p>Obtain updated business registration from Socogesta</p> <p>Obtain business license for the cafeteria and food supply service provider for the canteen.</p>
<p>Corrective Action Implemented <i>(including any evidence submitted)</i></p>	<p>Update procedure contacts management to indicate selection and verification criteria for legal compliance</p> <p>Write procedure for management of subcontractors to clearly define criteria for subcontractor audits, including verification of legal compliance. The procedure shall distinguish control mechanisms according to subcontractor risk levels, ensuring that higher-risk activities are subject to stronger oversight</p> <p>Conduct audits to verify both legal compliance and risk-based controls. Supervisors and contract managers will receive training in applying the revised procedure to ensure consistent implementation.</p>
<p>Date of Response</p>	<p>21.09.2025</p>
<p>Audit Team Conclusion <i>(including any evidence reviewed)</i></p>	<p>The action plan was approved 22.09.2025; effective closure will be subject to review in the next follow-up audit.</p>
<p>Status of Nonconformity</p>	<p><input type="checkbox"/> Closed <input checked="" type="checkbox"/> Open</p>
<p>Date of Closure:</p>	<p>DD Mmm YYYY</p>



Indicator Number	3.6.2
Nonconformity Number	4
Nonconformity Category	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
Recurring Nonconformity	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date of Nonconformity Issued	29.08.2025
Nonconformity Issued To <i>(when more than one site/member):</i> N/A	
Deadline:	<input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting
Mode of Nonconformity Closure	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
Standard Reference	RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 The effectiveness of the occupational health and safety system to address health and safety risks to people is monitored.
Nonconformity Statement: It was found that Agripalma does not effectively monitor the implementation of its Health and Safety (H&S) plan to mitigate risks to workers.	
Evidence: The following findings were observed during the <u>mill visit</u> : <ul style="list-style-type: none"> • Noise Exposure: Factory workers did not use hearing protection (earplugs or mufflers), despite noise levels exceeding the permitted limit of 66 dB (resulting from laboratory analysis), despite mandatory signs for use in the factory. • Boiler Station Risks: Personnel operating the boiler station were not equipped with adequate Personal Protective Equipment (PPE) to protect against bodily and facial injuries. A near-accident involving an operator was directly witnessed by the audit team. <u>Field Visit:</u> <ul style="list-style-type: none"> • Unsafe Handling of Cutting Tools: The audit team observed unsafe and unprotected handling of blades during transport, before and after work, and during the field visit to blocks J7/8 and AD02 in Divisions 409 and 410. Exposed blades are transported unsafely, including being tucked inside boots or hanging loosely on the body, posing significant safety risks 	



<p>Root Cause Analysis</p>	<p>Using the 5-Why methodology, review of current controls in place and interviews with coworkers to understand driving behaviors, the following root causes are identified:</p> <p>Noise levels and associated risks are not adequately communicated to mill workers, resulting in poor risk perception and insufficient safety awareness. Lack of effective supervisory control and enforcement mechanisms, resulting in non-compliance with existing safety signs.</p> <p>The absence of historical burn incidents in the boiler station has led to a low-risk categorization, which has resulted in the assignment of minimal personal protective equipment (PPE) for that area</p> <p>Despite training on sharp tool hazards, the cultural use of machetes has normalized the risks, leading to carrying them inside boots being overlooked in risk assessments and by safety personnel.</p>
<p>Correction(s)</p>	<p>Distribute helmets with integrated earmuffs to all relevant personnel in high noise risk areas, providing enhanced hearing protection compared to conventional separate earmuffs through a secure fit and consistent use. Provide training on correct use of new PPE.</p> <p>Issue reminders to all supervisors about their role in enforcing safety standards</p> <p>Post visual aids and hazard communication in key mill areas highlighting noise risks.</p> <p>Ensure workers have access to and correctly use hearing protection equipment.</p> <p>Inspect PPE to ensure all employees in high-noise areas are properly equipped and using the required protective gear.</p> <p>Reassess the boiler station hazards and update PPE requirements accordingly. Purchase and distribute appropriate PPE for boiler station operators and provide training correct use and mandatory PPE for boiler station.</p> <p>Conduct targeted training sessions emphasizing proper handling and storage of machetes</p> <p>Communicate the risks of carrying machetes inside boots, through Tool Box talks to workers, supervisors and safety agents, and safety posters. Make transportation of machetes to and from field the responsibility of supervisors;</p>



	carried and transported safely in bags and no longer transported individually by workers.
Corrective Action Implemented <i>(including any evidence submitted)</i>	<p>Update PPE type is PPE matrix to helmet with earmuffs for all high noise risk operations. Provide training on updated PPE Matrix</p> <p>Integrate noise hazard communication into annual safety training programs</p> <p>Update Risk assessment with revised PPE requirements. Communicate and provide training on revised risk assessment.</p> <p>Update boiler SOP with revised mandatory PPEs. Provide training on revised procedure.</p> <p>Update risk assessments to reflect risk of transportation of machetes inside boots with revised control measures. Communicate and provide training on revised risk assessment.</p>
Date of Response	21.09.2025
Audit Team Conclusion <i>(including any evidence reviewed)</i>	<p><u>The company presented evidence of the implementation of corrections and corrective actions, which were reviewed:</u></p> <p>Noise Exposure</p> <p>1. Helmets with integrated ear muffs were distributed to all relevant personnel in areas with high noise risk. Delivery records verified (completed forms and photographic records/9):</p> <ul style="list-style-type: none"> → Distribution sheet. Department: factory. PPE: Helmet. Date: 10/15/2025. Six workers received and signed for the items. → Distribution form. Department: Industrial. PPE: Hard hat. Dates: 10/15, 10/24/2025. Received and signed by 15 workers. → Distribution form. Department: Infrastructure. PPE: Ear protectors. Date: 10/23/2025. Received and signed by 2 workers. → Distribution sheet. Department: Factory. PPE: Ear protectors. Date: 10/24/2025. Received and signed by 15 workers. <p>2.Evidence of training records:</p> <ul style="list-style-type: none"> → Content (21 slides). Subject: Noise and use of PPE. Includes: objectives, trainer details, definitions of sound, noise, occupational noise,



	<p>types of noise, sound levels and exposure limits, noise levels in the palm oil factory, sources of noise, consequences of excessive noise, what hearing PPE is, the use of PPE (helmet with earphones), attaching the headphones to the helmet, cleaning and maintenance, product life, and good prevention practices. Trainer: HSE (Health and Safety at Work) Coordinator.</p> <p>→ Training record. Code: RG.01. Revision 6. 01/30/2025. Topic: Noise and use of PPE (personal protective equipment). Trainer: HSE Coordinator (Health and Safety at Work). Dates: 16,18.10.2025. Participants: 20 (positions: operators, welders, maintenance, production, industry, infrastructure). Knowledge assessment: Forty assessments were carried out and the results obtained were in a range of 6-9/10.</p> <p>→ Content (4 slides). Subject: Topic: Reinforcing supervisors' responsibilities in monitoring the use of personal protective equipment (PPE). Includes: Use of PPE, why it is important, supervisor responsibilities, and good supervision practices.</p> <p>→ Training record. Code: RG.01. Revision 6. January 30, 2025. Topic: Reinforcing supervisors' responsibilities in monitoring the use of personal protective equipment (PPE). Date: October 22, 2025. Participants: 5.</p> <p>→ Post-training questionnaire. Topic: Reinforcing supervisors' responsibilities in monitoring the use of personal protective equipment (PPE). Consists of: registration number, full name, department, role, date, and 4 questions. Evaluated: 5 supervisors. Score: 10/10.</p> <p>3. Photographic records (8) were presented showing the key areas where visual aids and communications were installed, highlighting the risks related to noise (signage implemented).</p> <p>4. To ensure that workers have access to hearing protection equipment and use it correctly, a daily PPE-POM check was implemented. The format includes: sector, options for marking the corresponding PPE, is the mandatory use of PPE being respected by all workers? (yes/no), is the PPE in good condition? (yes/no), if the answer is "NO" for any of the measures mentioned, select the corrective measures taken (replacement/warning/disciplinary action). Date and signatures of the supervisor and HSA technician.</p> <p>Evidence:</p>
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	<p>Daily PPE-POM check (5). Sector: maintenance workshop. Measure taken: replacement of PPE. Date: 10/30/2025.</p> <p>5. The type of PPE in the PPE matrix was updated to ear-flap helmets for all operations with a high risk of noise, and training was provided on the updated PPE matrix. PPE Matrix September 2025. HSA-018 Revision 10. Prepared by the Sustainability Director, reviewed by the HSE Coordinator, and approved by the CEO on 09/25/2025.</p> <p>6. The risk assessment was updated with the revised PPE requirements. Document: Risk Assessment HSA-MDR-001. October/2025. Activity: Maintenance/Cleaning in confined spaces (water/CPO tanks, sterilizer, boiler). Hazard: High noise levels near or inside the tank. Risk: Hearing problems. Preventive/corrective measures and control: Activity requires a work permit/workers must have procedures and training in confined space work. <u>Workers must have emergency procedures and be trained for this purpose/Perform annual noise analyses. Training on noise must be provided. Implement a daily checklist to verify the use of PPE. Noise awareness campaigns.</u></p> <p>7. Training on communicating noise-related risks has been integrated into the annual safety training programs. Annual Training Plan 2026:</p> <ul style="list-style-type: none"> → Target audience: Industrial Factory; Mechanical Office, Drivers (tractor drivers & machine operators), Infrastructure, HSA Agents. → Responsible for providing training: HSE Coordinator → Month: April. <p>Boiler Station Risks</p> <p>8. The risks in the boiler room were reassessed and the PPE requirements updated accordingly. Evidence: Document: Occupational risk assessment map. HSA-MDR-001. Revision 9. Updated on 10/25/2025. Activity: Maintenance/Cleaning in confined spaces (water/CPO tanks, sterilizer, boiler). Hazard: Exposure to high temperatures/heat Risk: Dehydration, decreased performance/Burns/Heat Preventive/corrective measures and control:</p>
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	<p>Provide appropriate PPE (mask, goggles, visor, flame-resistant coveralls). Train workers on operating procedures/appropriate protective equipment. Workers should take regular breaks and drink water frequently.</p> <p>Evidence: Document: PPE Matrix. HSA-018. Revision 10. Updated in September 2025. Activity: Production Function: Boiler operator Risk: Burns, falls, hearing loss/high noise levels PPE defined for feet, body, head, eyes, etc.</p> <p>9. Delivery records verified (completed forms and photographic records/5):</p> <ul style="list-style-type: none"> → Distribution sheet. Department: factory. PPE: Disposable mask with filter. Date: 29/10/2025. Six workers received and signed for the items. → Distribution sheet. Department: factory. PPE: safety glasses. Date: 28/10/2025. Six workers received and signed for the items. → Distribution sheet. Department: factory. PPE: anti-chrome gloves. Date: 28/10/2025. Six workers received and signed for the items. → Distribution sheet. Department: factory. PPE: face shield. Date: 28/10/2025. Six workers received and signed for the items. → Distribution sheet. Department: factory. PPE: flame resistant coveralls. Date: 28/10/2025. Six workers received and signed for the items. <p>10. The Steam Production Station Procedure was updated. Code: PO-208. Revision 1. 05/21/2025. It consists of: objective, scope, definitions, responsibilities, procedure/instruction description, associated documents, HSST notes, environmental notes, reference documents, document approval, and change history.</p> <p>Paragraph added: "in case of emergency, one should:</p> <ul style="list-style-type: none"> - close the fiber feed to the boiler; - close the steam outlet valve of the boiler; - switch off the fan id contactor (open the panel door and switch off the contactor); - take out all the fire inside the boiler; - never replace water, if the water level on the display is zero, and the light is red light on the panel. Water can cause thermal shock and blow up the boiler; - leave the boiler to cool until the next day"
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	<p>11. Evidence of training records:</p> <ul style="list-style-type: none"> → Content (13 slides). Name: Use of PPE for the boiler. Includes: objectives, trainer details, main risks in the boiler area, mandatory PPE for the boiler (helmets with built-in ear muffs, filter mask, protective gloves, flame-resistant coveralls, steel-toed boots), correct and incorrect uses of PPE, responsibilities of the worker and Agripalma. Trainer: HSE (Health and Safety at Work) Coordinator. → Training record. Code: RG.01. Revision 6. 01/30/2025. Topic: Use of PPE for boilers. Trainer: HSE Coordinator (Health and Safety at Work). Dates: 23, 25.10.2025. Participants: 5. Positions: operators. → Training record. Code: RG.01. Revision 6. 01/30/2025. Topic: Update of the Steam Production Station Procedure. Code: PO-208. Revision 1. 21.05.2025. Date: 25.10. 2025. Participants: 6. → Training record. Code: RG.01. Revision 6. 01/30/2025. Topic: Update of the PPE matrix and risk analysis. Code: PO-208. Revision 1. 21.05.2025. Date: 27.10. 2025. Participants: 4. → Post-training questionnaire and Knowledge assessment. Topic: Use of PPE for boilers. Consists of: registration number, full name, department, role, date, and 6 questions. Evaluated: 6 workers (electricians and boiler operators). Score: 10/10. <p>Unsafe Handling of Cutting Tools (Field)</p> <p>12. The risk assessment was updated with the revised PPE requirements. Document: Risk Assessment HSA-MDR-001. Updated: 10.25.2025 (Plantations) Activity: Harvest Hazard: Handling of sharp objects (machete) Risk: Cuts and injuries Preventive/corrective measures and control: Regular HSA awareness training (guidelines, training, periodic inspections); Workers must perform tasks in accordance with standard operating procedures. They must not be distracted when sharpening cutting tools and must transport cutting tools safely (with protection or in protective bags/boxes). Warn of the risk of transporting machetes inside boots, close to the body, to avoid injury.</p> <p>13. Agripalma socialized internal communication No.40/2025. Code: RH.00.12.05.2021. Subject: Machete distribution process. Among other topics, the following was communicated:</p>
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	<ul style="list-style-type: none"> → It is also reported that in case of damage, a new machete will be delivered after the damaged machete is returned. → The foremen will be responsible for distributing and storing the machetes daily and: → It is prohibited to take this tool home; these must be kept in the offices of each section. <p>14. Standard operating procedure. Code: AGR.010. Version 5. 10/15/2025. Objective: Establish operational criteria and standards for the Agripalma Plantation Department Provide training on updated procedures. The plantation's standard operating procedure was updated to describe the free distribution of the required work tools and the periodicity of the distribution according to the type of tools for the plantation.</p> <p>15. Specific training sessions were held, emphasizing the proper handling and storage of machetes. Evidence of training records:</p> <ul style="list-style-type: none"> → Training record. Code: RG.01. Revision 06. 01/30/2025. Topic: Update of the Standard operating procedure. Code: AGR.010. Date: 10/22/2025 (Participants: 6 / technicians and managers). → Training record. Code: RG.01. Revision 6. 01/30/2025. Topic: New process for collecting and returning machetes. Date: 8,16,17,20.10.2025. Participants: 251. Positions: Maintenance, cutters, collectors, foremen, technicians, assistants, and managers. → Content (11 slides). Name: Accident prevention, correct use, transport, and handling of cutting tools. Includes: Introduction, objective, what not to do, how to transport them correctly, and what to do with them after use. → Training record. Code: RG.01. Revision 6. 01/30/2025. Topic: Accident prevention: correct use, transport, and handling of tools. Date: 18.09.2025. Participants: 216. Positions: maintenance workers, cutters, collectors, and foremen. → Training record. Code: RG.01. Revision 6. 01/30/2025. Topic: Accident prevention: correct use, transport, and handling of tools. Date: 15.10.2025. Participants: 20. Positions: Foremen and technicians. → Post-training questionnaire and Knowledge assessment. Topic: Handling and storage of cutting tools (machete). Consists of: registration number, full name, department, role, date, and 5 questions. Evaluated: 16 workers (Foremen and technicians.). Score: 6-8/10.
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	<p>16. During the training records, a guide called: New process for lifting and returning machetes was delivered. Objective: Ensure everyone understands the new machete control system. In addition to that, reduce losses, ensure daily returns, increase discipline and organization. The guide includes: lifting, use during the day, advantages of the process and photographic images of the delivery and how to store the machetes. The guide emphasizes that correct use is mandatory and literally says: Do not carry the tool on your body, do not place it in your pocket, on your waist, inside your boots, or in any part glued to the body (September/2025).</p> <p>17. Posters were placed on the plantations regarding the handling of cutting tools (photographic records provided (September/2025).</p> <p>Based on the evidence presented, it is concluded that the company has implemented the proposed corrections and corrective actions, and therefore this non-conformity is closed.</p>
Status of Nonconformity	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
Date of Closure:	5.11.2025



Indicator Number	6.5.4
Nonconformity Number	5
Nonconformity Category	<input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity
Recurring Nonconformity	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date of Nonconformity Issued	29.08.2025
Nonconformity Issued To (<i>when more than one site/member</i>): N/A	
Deadline:	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
Mode of Nonconformity Closure	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
Standard Reference	<p>RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018</p> <p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p>
<p>Nonconformity Statement: Agripalma's complaints mechanism is not properly implemented and documented. During a review of the file on the receipt, processing, and resolution of complaints filed over the past year, was found missing follow-up columns, inconsistent complaint closure dates compared to the parallel control records maintained by the person responsible, and incorrect closure dates, where some complaints include the date of the last intervention rather than the date of feedback to the complainant informing them of the resolution.</p>	
<p>Evidence: - External Complaint and Complaint Document 2024-2025 - Complaints # 008/2024, 009/2024, 011/2024, 013/2025, 014/2025</p>	
Root Cause Analysis	<p>Using the 5-Why methodology, review of current controls in place and interviews with coworkers to understand driving behaviors, the following root causes are identified:</p> <p>Despite training provided, workers responsible for maintaining the grievances database lacked clarity on the specific requirements for data entry, and the file design was not user-friendly, contributing to errors and inconsistencies in completion</p>
Correction(s)	<p>Fill in missing information and correct inaccuracies in revised file for 2024 and 2025. Revise the database format engaging with the responsible workers to ensure it is user-</p>



	friendly and provides complete and traceable recording of grievances.
Corrective Action Implemented <i>(including any evidence submitted)</i>	Reinforce monthly meetings with Head of sustainability and General Manager to ensure adequate recording and handling of grievances. Include in annual internal audit plan auditor to grievances procedures.
Date of Response	21.09.2025
Audit Team Conclusion <i>(including any evidence reviewed)</i>	The action plan was approved 22.09.2025. The effective closure will be reviewed in the next audit.
Status of Nonconformity	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Open
Date of Closure:	DD Mmm YYYY

Indicator Number	6.7.2
Nonconformity Number	7
Nonconformity Category	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
Recurring Nonconformity	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of Nonconformity Issued	29.08.2025
Nonconformity Issued To <i>(when more than one site/member):</i>	N/A
Deadline:	<input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting
Mode of Nonconformity Closure	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
Standard Reference	RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.



Nonconformity Statement:

The plant's emergency plan has some deficiencies in its definition:

- During the plant visit, it became clear that there are no containment dikes in the storage tank area, and these are not included in the current emergency plan. The Plant Manager reported that this is a pending project.
- In Division 410 (Block AD/02), during the audit, there were no emergency kits available in the field area, and there was no transportation available to respond to an accident and obtain medical care.

Evidence:

- Socfin Palm Oil Plant Manual Emergency Plan 2024.
- Observations made by the auditor during the field visit

Root Cause Analysis

Using the 5-Why methodology, review of current controls in place and interviews with coworkers to understand driving behaviors, the following root causes are identified:

Although the project and budget were validated by Agripalma, implementation was not prioritized because the risk associated with the potential volume of leaks from large storage tanks was not adequately considered in the Risk Analysis and Emergency Procedure.

Additional personnel were covered in the 1st aid training but during emergency preparation therefore failure in updating the 1st aiders contact list and communication in division 410 as well as update in the location of 1st aid kits, thus employees were not aware of where to find the 1st aid kits not to locate all existing 1st aiders.

When providing the emergency ambulance contact from public services the difficult access was not adequately evaluated in the risk assessment, thus a quick response transportation was not made available.

Correction(s)

Increase the number of spill kits around the tank perimeter. Conclude the pending project design and planning to ensure spill response capacity accounts for the maximum potential leak volume.

Update the Emergency Procedure to explicitly cover large storage tank leak scenarios.

Conduct refresher training for relevant staff on the revised emergency response requirements.

Make available a emergency response vehicle in Porto Alegre ready to transport workers for medical assistance. Increase number of 1st aiders and 1st aid kits in Porto Alegre – Division 410.

Corrective Action Implemented
(including any evidence submitted)

Display poster on emergency measures in case of spills and provide related training.



	<p>Add to annual emergency drills Plan, an emergency drill for spills after the construction of the tanks.</p> <p>Provide training to employees on potential spills and proper response procedures (Emergency Procedure).</p> <p>Provide training on the updated Risk Analysis and include these trainings in the annual training plan.</p> <p>Update list of contact for 1st aiders with additional personnel and list of location of 1st aid kits for all sectors/work areas, including Porto Alegre/Division 410</p>
<p>Date of Response</p>	<p>21.09.2025</p>
<p>Audit Team Conclusion <i>(including any evidence reviewed)</i></p>	<p><u>The company presented evidence of the implementation of corrections and corrective actions, which were reviewed:</u></p> <p>Containment dikes in the storage tank area.</p> <ol style="list-style-type: none"> 1. The spill kits around the perimeter of the tank were increased (3 kits). Photographic records provided evidence. 2. Document submitted: Proposals for the construction of tanks retention basin- Bund walls around the CPO Storage Tanks (Project 25.006/ Palm Oil Mill). It consists of: <ul style="list-style-type: none"> → Executive summary. This describes that the objective of the proposal is to build a retention pond (dike) around the crude palm oil (CPO) storage tanks, in order to effectively contain any accidental spills during filling, emptying, or maintenance operations. surrounding area (Signing 11.09.2025). → Project Schedule. It consists of: <ul style="list-style-type: none"> • Preliminary assessment of the proposed solution (Preliminary design, Final design, Bill of quantities, Estimated costs, Approval). Phase timeline: August-September, 2025. • Procurement (Request for quotations, Analysis of proposals, Purchase Orders, Delivery). Phase timeline: October 2025 to mid-April 2026. • Construction (Groundworks, Concrete, Steel Structures and Equipment, Piping & Mechanical Works, Electrical Works). Phase timeline: Mid-September to May 2026. • Commissioning (On receipt of equipment, Equipment installed - Power Off, Individual equipment's functional, Power On/No Load, Entire major equipment functional, Power On/Under Load, Emergency and safety systems functional - Power On/UL). Phase timeline: May, 2026.



	<p>The evidence presented based on the above timeline is:</p> <ul style="list-style-type: none"> → Design. Perimeter bund wall with 1.20 m high. Scale: 1:1000. Project description: Retention basin for CPO storage tanks Palm Oil Factory, Agripalma - São Tomé and Príncipe (Africa). Date: August 2025. → Budget by phases. The phases are: foundations, concrete, steel structures and equipment, piping and mechanical works, electrical works. Total budget: €107,080.00. Document signed on September 11, 2025, by the industrial director. → Request No. 25.034. Departamento: AGR.POM.25. Description: Work 2025.006_ Tanks Retention Basin. Materials: aggregates, cement, construction steel. <p>Remarks: Request quotes and submit proposals to the Industrial Director for analysis. Supplies should be phased in according to the progress of the work. Date: 12.09.2025</p> <ol style="list-style-type: none"> 1. The emergency procedure was updated to explicitly cover scenarios involving leaks in large storage tanks. (Emergency Procedure. Code: AGR-HSA-ADM-02203. Revision 1. 04/15/2022. Updated and approved on 10/13/2025. Included: definitions, emergency routes and exits (location of spill kits), environmental spills of hazardous materials (use available spill kits). 2. Training on Emergency Procedures in the event of a spill has been integrated into the 2026 training plan Annual Training Plan 2026: <ul style="list-style-type: none"> → Target audience: Industrial Factory; Mechanical Workshop, Plantation, Warehouse; Infrastructure and HSA Agents (Factory, Workshop, IE, and Waste Center). → Responsible for providing training: HSE Coordinator → Month: July. 3. Employees were trained on potential spills and appropriate response procedures (emergency procedure). <ul style="list-style-type: none"> → Training record. Code: RG.01. Revision 06. 01/30/2025. Topic: Procedure in case of spills. Code: AGR.01. Date: 30/01/2025. Revision 6 (Participants: 19 / Technicians, assistants, and operators.). Date: 27.10.2025.
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	<p>→ Posters were displayed on emergency measures in the event of spills, and the corresponding training was provided. Photographic records evidenced. Date: 27.10.2025.</p> <p>4. Included in the annual emergency drill plan is an emergency spill drill following the construction of the tanks. Document: HSA 2026 Drill Plan Emergency scenarios: - Chemical spill emergency: April and August 2026. - CPO spill emergency: June, September, and December 2026.</p> <p>Emergency kit / Transportation available</p> <p>5. The list of first responders was updated with additional personnel, and the list of first aid kit locations was updated for all sectors/work areas, including Porto Alegre/Division 410 (sections 1, 2, 3, and 4). Photographic records of the publication of the lists in each section were provided.</p> <p>6. Training on first aid into the 2026 training plan Annual Training Plan 2026: → Target audience: Industrial Factory; Mechanical Workshop, Plantation, Warehouse; Infrastructure; Administrative, HSA agents → Responsible for providing training: Firefighters → Month: July.</p> <p>7. Training record. Code: RG.01. Revision 06. 01/30/2025. Topic: HSE Training - Emergency Response. Participants: 45 / Agricultural maintenance personnel. Date: 30.10.2025.</p> <p>8. Records of the delivery of emergency kits to those responsible in each section were presented, along with photographic records. Format: Nominal distribution of equipment - First aiders - HSA. Emergency kits were delivered to 27 employees in sections 1, 2, 3, and 4 on October 30, 2025.</p> <p>9. Publication in sections 1, 2, 3, and 4 (plantations) of poster with information regarding emergency response procedures: first aid and emergency contacts (supported by photographic records)</p>
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	<p>10. An allocation contract was signed to provide an emergency response vehicle in Porto Alegre, ready to transport workers who needed medical assistance.</p> <p>Evidence:</p> <ul style="list-style-type: none"> → Vehicle rental contract for personnel transport signed between the lessor and Agripalma on October 28, 2025. In the second clause, among other obligations, the lessor must have a vehicle and driver available to provide assistance in case of emergency. → Photographic record of the rented vehicle. → Photographic record of the driver's identity <p>Based on the evidence presented, it is concluded that the company has implemented the proposed corrections and corrective actions, and therefore this non-conformity is closed.</p>
Status of Nonconformity	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
Date of Closure:	28.11.2025 Conditional closure. Document signed by the parties on 28/11/2025. SCS technical team will monitor compliance (dates: 27/02/2026 and 27/05/2026)

18. Opportunity for Improvement (OFI) Issue in this Audit

Indicator Number	1.1.4C
Opportunity for Improvement Number	1
Date of Opportunity for Improvement Issued	29.08.2025
Opportunity for Improvement Issued To <i>(when more than one site/member):</i> N/A	
Standard Reference	Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official
<p>Opportunity for Improvement Statement: The company maintains records of all support requests and has a person responsible for handling, monitoring, and responding to them, but this implementation is not clearly defined in the company's communication procedures.</p>	



Indicator Number	6.7.1C
Opportunity for Improvement Number	6
Date of Opportunity for Improvement Issued	29.08.2025
Opportunity for Improvement Issued To <i>(when more than one site/member):</i> N/A	
Standard Reference	There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.
<p>Opportunity for Improvement Statement:</p> <p>Occupational health and safety (H&S) minutes do not record the status of topics/issues discussed between meetings. They simply no longer appear in the following minutes (no record is kept).</p>	

Indicator Number	7.12.8 C
Opportunity for Improvement Number	8
Date of Opportunity for Improvement Issued	29.08.2025
Opportunity for Improvement Issued To <i>(when more than one site/member):</i> N/A	
Standard Reference	Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) apply.
<p>Opportunity for Improvement Statement:</p> <p>Agripalma's Land Use Change Analysis identified 24.89 hectares under Title 410 that require environmental remediation due to oil palm planting prior to 2005.</p> <p>The RSPO approved the Remediation and Compensation Plan (RACP) in November 2022, and it includes two main activities.</p> <p>First, the demarcation of riparian zones has been completed, with all relevant palm trees marked and chemical inputs excluded, in accordance with Agripalma's organic certification.</p> <p>Second, reforestation, with the planting of 400 endemic trees per hectare over five years, has not yet begun. However, Agripalma has formalized a partnership with the São Tomé Department of Forests</p>	



and Biodiversity (DFB), evidenced by electronic correspondence beginning on May 30, 2024, a signed agreement, a quarterly implementation plan dated August 2025, and an approved budget.

Field activities are scheduled to begin in late August 2025.



19. Status of Nonconformities Previously Identified and Opportunity for Improvement

Indicator No	Nonconformity No	Evidence Observed / Nonconformity Raised	Auditee Response	Verification of Correction/ Corrective Action	Conclusion /Status
			Correction / Corrective Action		
4.2.3	03	<p>The company does not keep stakeholders informed about complaints and the progress of the resolution process. During the document review, it was verified that the company receives, handles, and resolves external complaints, but complaints were identified that were closed approximately 8 months after the complaint or request was registered or after an initial response was given. During these periods, no evidence was provided that the complainant was informed of the progress of their complaint or request.</p> <p>This situation also does not comply with Point 9 of the External Complaints Procedure, where Agripalma states that it will publicly present a report on complaints related to its activities and will</p>	<p>Corrections</p> <p>Update and make more efficient register, with an alarm system to alert when complaints handling process is approaching the established deadline for closure and feedback. for records of external complaints and fill out all missing information.</p> <p>Correct procedure to clarify public communication of complaints register to be shared upon request.</p> <p>Review register and ensure closure or feedback/updated for all open grievances to complainer.</p> <p>Corrective actions</p> <p>Update procedure to explain how to provide feedback and frequency required when grievance cannot be resolved or closed within the stipulated timeframe.</p>	<p>The company presented the following evidence of implementation:</p> <ul style="list-style-type: none"> * Update of the internal complaint's procedure. Code: AGR-HSA-ADM-010. Version 5 explaining how to provide feedback and the frequency required when the complaint cannot be resolved or closed within the stipulated time frame. * Evidence of communication to interested parties of the update of the procedure (6,14,15,18.08.25) 	<p>The evidence presented and reviewed was sufficient to successfully close the NC. Therefore, the NC is closed on 25/08/2025.</p>



		<p>regularly follow up on the progress and resolution of complaints. Additionally, it states that the response time, which is 60 days, may be modified, and this will be communicated by the company to the stakeholders. Finally, the complaint registration document contains blank spaces and errors in filling out, leading to inconsistent information.</p> <p>Evidence:</p> <ul style="list-style-type: none"> • Complaints and Grievances Register 2024 (Complaints #8 and #9). • External Complaints Procedure. Code AGR-HSA-ADM-02208. Revision 00.18.02.2022. • Interview with the social and community liaison officer. 	<p>Training community liaison officer on new procedure and develop alert system for grievances reach due date for response.</p> <p>Include in procedure monthly requirement for submission of complaints log to General Manager and Sustainability Manager, and responsibility for Sustainability Manager to flag/alert via email to community liaison officer and General Manager of approaching deadlines and confirm action was taken and/or feedback provided on status of complaint.</p> <p>Conduct regular audits to ensure procedure is being followed correctly. Implement a continuous communication platform with stakeholders could help ensure that everyone is aware of how to track their complaints.</p>	<ul style="list-style-type: none"> * Guide/presentation Update of the internal complaint's procedure. * Training record. Code: RG.01. Version 6. Topic: Complaints and claims procedure. Date: 06/30/2025. Attendees: 13. * Communication table with details of Whistleblow detailing the reporting mechanism and the different communication channels. * Sustainability meeting record. Code: SUS-RSPO-02301. Version 0. Topic: review of internal complaints and claims. 	
6.7.2	05	<p>The accident and emergency procedures in place at Agripalma do not fully comply with the requirements outlined in the RSPO indicator, as significant gaps have been identified that compromise</p>	<p>Corrections</p> <p>Unobstructed Fire extinguisher and place Emergency Exit sign in fuel station.</p>	<p>The company presented the following evidence of implementation:</p> <ol style="list-style-type: none"> 1. Obstacle-free fire extinguisher, placement 	<p>The evidence presented and reviewed was sufficient to successfully</p>



		<p>the effectiveness of these procedures and the safety of workers.</p> <p>Agripalma has a health, safety and environment plan Ref HSA-PL-02 revision 3 dated on 01/07/24. Records in the event of an accident, first aid kits are made available for review and inspection during the audit.</p> <p>It was evident from documentation review, direct observation and interviews that accident and emergency procedure at the fuel station not implemented. Indeed: 1 extinguisher into the working area is not accessible at any time. Entry door used as exit door which is not identified. No operator trained on the first aid available for immediate response in case of emergency.</p> <p>Car parking area for service is accessible and people are freely using their mobile phone (observation of the transport contractor making phone call in this area).</p> <p>- _The main storage tank at the fuel station facility do not discharge pipe with a flow rate sufficient to allow his content to flow to an</p>	<p>Provide First Aid training to fuel station operator with designated 1st Aid kit to fuel station.</p> <p>Place phone prohibited side on walls of Fuel station for more communication of Rules.</p> <p>Provide training to fuel station operator on safety rules for his work area.</p> <p>Adjust pipe flow rate for safe and adequate filling of vehicles without spillage.</p> <p>Fix roof leak in fuel station and welder working station.</p> <p>Provide list of transport requirements to subcontractors and follow-up on corrections with timelines.</p> <p>Purchase eye-wash bottles for laboratory</p> <p>Perform regular safw inspections to verify effectiveness of corrections.</p> <p>Corrective actions</p> <p>Provide refresher training to HSE agents on inspection for Fire Extinguishers.</p> <p>Create procedure for operation and safety rules for fuel station. Provide training to all involved personnel on new procedures. Include requirement for monthly safety inspection to fuel station.</p> <p>Designate or create employee waiting/sitting area distant from Fuel</p>	<p>of emergency exit signage at the fuel station.</p> <p>2. First aid training was provided to the fuel station operator with the aid kit and training in safety rules for his work area.</p> <p>3. Training of various departments, Transportation, plantation and factory representatives. Annual training: 07/18/2025. Participants: 42. Carried out by a private security and support company for the fire department.</p> <p>4. Placing posters on the walls of the fuel station to obtain more communication of the rules such as the prohibition of the use of telephones in the nearby transportation waiting area.</p> <p>5. A restoration of the fuel house was carried out where the pipe flow rate was adjusted for safe and adequate filling of vehicles (without spillage).</p>	<p>close the NC. Therefore, the NC is closed on 25/08/2025.</p>
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		<p>appropriate place without spilling onto the floor. Indeed, flow meter mechanism has been installed using tap with flexible pipe which have been closed at his top. Direct observation shown that fuel leakage from the trap although company put a small recipient at the back of the trap.</p> <p>- _Roof is leakage during rain time inside the fuel storage area.</p> <p>Additionally, from direct observation during raining on 13/09/24:</p> <p>Roof of working area of the welder is leakage during rain time and where the welding kit electrical transformer is stored. Workers are transported from the plantation assembly point to their respective village into trucks which are not covered by roof, without sitting place.</p> <p>The factory laboratory does not have an eye wash and shower in case a work accident occurs while the shift assistant is carrying out his activities.</p> <p>The shift of workers from the sections located on Farm 409 is transported every day in a truck without a limit on the number of people occupying</p>	<p>station. Provide training to employee on Fuel station safety rules/behavior</p> <p>Provide training to subcontractor responsible and drivers on Road safety rules.</p> <p>Include in Annual supplier audit plan compliance to road safety rules.</p> <p>Conduct annual inspection of all building and working stations and establish annual maintenance plan of infrastructures.</p> <p>Revise Laboratory Emergency plan to include availability of eye-wash bottles.</p> <p>Provide refresher training on lab emergency procedure.</p> <p>Implement regular training and campaigns to workers, including subcontractors to make them continuously aware of new safety regulations. Provide continuous feedback.</p> <p>Incluya requisitos para la inspección mensual de seguridad a la estación de combustible Designe o cree una sala de espera/sesión de empleados distante de la estación de combustible.</p> <p>Proporcionar capacitación a las reglas/comportamiento de seguridad de la estación de combustible en la estación de combustible</p>	<p>6. Fix the roof leak at the fuel station and welder workstation.</p> <p>7. Provided a list of transportation requirements to subcontractors and RSPO V-1 OCT 2024 284 and tracked corrections with timelines.</p> <p>8. Provided refresher training to HSE officers on fire extinguisher inspection (Attendance list, 07/14/2025).</p> <p>9. Created procedure for operating and safety rules for the fuel station and provided training to all personnel involved in new procedures.</p> <p>10. Provided training to the responsible subcontractor and drivers in road safety rules. Inspection carried out (will be done annually) of all construction and work stations and an annual infrastructure maintenance plan established. (Evidenced training material).</p>	
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		the vehicle and without any kind of safety additions.		11. Revised laboratory emergency plan to include availability of eyewash bottles. (photographic record) 12. Refresher training on laboratory emergency procedure.	
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Indicator No	Opportunity for Improvement Number	Opportunity for Improvement Statement:	Verification / Follow-up actions:
6.5.3	08	Based on the document review and interviews with the sustainability department and the gender committee, the company has been attentive to the needs of new mothers, particularly their requests for more time with their children. The company has also been visiting the daycare centers where their children are cared for to assess the quality of attention and take measures to improve services. However, during consultations with the vulnerable population, three of the new mothers indicated that they had not been consulted, meaning 100% of this group was not engaged in consultations over the past year.	No corrective or preventive actions were presented for this OFI.
6.5.4	09	The Human Resources department is responsible for handling internal complaints within the company. The	No corrective or preventive actions were presented for this OFI.



		auditor reviewed the receipt, handling, and resolution of complaints received over the past year. Although the responsible party provided physical documents demonstrating that monitoring and closures are being carried out, the internal complaints and grievances log is not fully completed, making it difficult to track the company's follow-up process.	
7.3.1	10	Agripalma has a waste management plan “PLANO DE GESTÃO DE RESÍDUOS”. “HSE MONTHLY REPORT Waste Management” was also available and have been reviewed. Details of different waste is available and was reviewed as per the inspection done in each department to monitor the implementation of the plan. Various wastes have been reduced from 2023 to 2024 and recycled. No deviation on disposal was observed at the audit time. Since used oil are stocked and not quantity have been yet disposed, reduction, recycling, reusing was not captured by the waste management plan.	No corrective or preventive actions were presented for this OFI.
7.8.1	11	Agripalma potable water to workers using water containers at several working area points. It was evident from interview conducted with several workers that some of them are now confident on the potable of the water supplied through the containers. Evidence reviewed shown that water is supplied from national water company named EMAE. Cleaning records of water storage containers have been reviewed, same of water transport agent used by the company. No deviation observed at the audit time.	No corrective or preventive actions were presented for this OFI.



20. Stakeholder Consultation Process

CB should ensure that all relevant stakeholders are consulted. The relevant stakeholders include but are not limited to statutory bodies, indigenous peoples, local communities (including women representatives, and displaced communities), workers and workers' organisations (including migrant workers), smallholders, and local and national NGOs.

Date of public announcement made: [N/A](#)

Summary of stakeholder's comments and the CB's responses and findings are presented in the table below:

11.1 For Audit Report

No	Consulted Stakeholders <i>Name of Stakeholders</i>	Date of Consultation/ Comment Received	Method of Consultation/Comment received	Feedback/Comments/Issue Raised Received from Stakeholders	CB's Responses
-	-	-	-	-	-

11.2 For Public Summary Report

No	Consulted Stakeholders <i>Name of Stakeholders</i>	Date of Consultation/ Comment Received	Method of Consultation/Comment received	Feedback/Comments/Issue Raised Received from Stakeholders	CB's Responses
1	Occupational Health and Safety Committee	27.08.2025	Face-to-face The committee is currently made	No issues were raised that require a response from Management.	No issues were identified that would lead to a



			<p>up of 8 workers, 4 from the plant and 4 from the factory.</p> <p>This committee emphasizes that its objective is to promote an environment of environmental health and safety.</p> <p>The members meet weekly with field workers and factory workers to discuss possible risks and hazards identified in the company's operations.</p>		nonconformity.
			<p>The auditor verified the last 3 meeting minutes of this committee, which meets every 3 months, where the status of the topics of the previous minutes is reviewed, new topics are recorded, immediate actions are defined and action plans are defined with estimated implementation times</p>		
2	Gender Committee	27.08.2025	<p>Face-to-face</p> <p>Currently the committee has 7 mixed members and 5 of the members participated in the consultation.</p> <p>The committee meets quarterly.</p> <p>The auditor reviewed some minutes and the topics discussed were presentation of the gender equality policy, presentation of the maternity protection procedure HSA-02209, presentation of the proposal presented to mothers on</p>	<p>No issues were raised that require a response from Management.</p>	<p>No issues were identified that would lead to a nonconformity</p>



			<p>breastfeeding leave, and appointment of a new governing body of the gender committee.</p> <p>The committee meets quarterly.</p>		
			<p>It was verified:</p> <p>Minutes of the Gender Committee Meeting. Date: August 8, 2025. Participating Members: 7.</p> <p>Agenda:</p> <p>4 points. Discussion on each of the following topics:</p> <ul style="list-style-type: none"> - Presentation of the results of the consultation with new mothers from all sections of the company. - Presentation of the strategic plans to mitigate the difficulties faced by mothers. - Introduction of the committee members in each section. - Presentation about the activity with the women that was to take place on September 19, 2025. 		

3	Vulnerable Population	27.08.2025	<p>Based on the list of vulnerable populations, 10 workers were sampled, including disabled persons, pregnant women, nursing mothers, elderly persons, and illiterate persons.</p> <p>The workers work according to the workday, receive the national minimum wage, have contracts, are familiar with the complaint and grievance mechanism, and the pregnant women and nursing mothers stated that they were interviewed to learn about their situation as new mothers.</p>	No issues were raised that require a response from Management.	No issues were identified that would lead to a nonconformity
4	Trade Union Commission	27.08.2025	<p>Face-to-face</p> <p>The union committee is made up of 5 members and currently has 15 delegates representing field and administrative workers.</p>	<p>Union members expressed their dissatisfaction with the company, reporting that the company pressured workers to sign letters of acceptance with the agreed wage increases for the next three years and showed documents summoning company management to participate in meetings to be held at the Ministry of Labor's facilities, which management did not attend.</p>	<p>These issues were reported to the company's management, which during the audit presented its responses and arguments on each of these issues.</p> <p>(See details see details in indicator 6.3.2).</p>

5	<p>Communities</p> <ul style="list-style-type: none"> • Praia Pesqueira • Monte Mário • Ribeira Peixe • Vila Malanza 	28.08.2025	<p>Face-to-face</p> <p>Five communities were invited, of which four participated.</p> <p>In general terms, the community representatives stated that there is a good relationship with the company and that every 3 months the social manager visits them to discuss various issues, listen to their difficulties and requests.</p> <p>Community leaders commented that they are aware of the existence of the complaints and claims mechanism and that mailboxes have been installed in the communities.</p> <p>Community leaders commented that over the past year, the company has supported them with various donations, such as:</p> <ul style="list-style-type: none"> - Water supply - Street maintenance - Construction of bathrooms - Donation of soccer equipment -Expansion of daycare infrastructure. 	No issues were identified that would lead to a nonconformity.	No issues were identified that would lead to a nonconformity.
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6	<p>State agencies</p> <ul style="list-style-type: none"> • Centro de Saude de Angolares • Camara Distrital de Caué • Delegação Distrital da Educação de Cauê • Direção das Florestas 	28.08.2025	<p>Face-to-face</p> <p>In general terms, representatives from state agencies stated that the company's presence in the region is positive, as it generates employment and there are meetings between the parties to strengthen the implementation of various initiatives by their entities. Agripalma also donates and provides support in the form of training, donations, and participation in different campaigns.</p> <p>Examples:</p> <ul style="list-style-type: none"> - Maintenance of the inspection post in the community of Ribeirao Peixe. - Support in waste management. 	No issues were identified that would lead to a nonconformity.	No issues were identified that would lead to a nonconformity.
7	Contractors		<p>Face-to-face</p> <p>Nine subcontractors were sampled, and three of them participated in the consultations. Their activities include food service, transportation of FFB and other materials, and personnel transportation. The contractors declared that they have contracts with Agripalma and</p>		

			<p>that its workers are registered in Social Security.</p> <p>They commented that the entrance to the company's facilities is controlled and that the use of personal protective equipment is verified.</p> <p>They also commented that they have a copy of their contracts and that payments are made on time.</p>		
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11.3 Summary of workers interviewed, and the CB's responses and findings are presented in the table below:

Total Workers in the Unit of Certification			765		
Sampled Worker Consulted/ Interviewed in This Audit			97		
No	Type of Workers Consulted/ Interviewed	Interview Method	Feedback/Comments/Issue Raised/ Received from Workers	CB's Responses	
35	Harvesters, Carriers and Loose fruit pickers	Face to face group and individual	It was mentioned that company policies are communicated. Payments are made according to the contract and tasks performed. PPEs are provided as per the risk matrix and free of charge. Medical services are available, and accidents are covered. No accommodation provided	No issue of concern raised	



			since they live in their communities close to the plantation, transportation is provided.	
25	fruit pickers/maintenance	Face to face group and individual	<p>It was mentioned that company policies are communicated. Payments are made according to the contract and tasks performed. PPEs are provided as per the risk matrix and free of charge. Medical services are available, and accidents are covered. No accommodation provided since they live in their communities close to the plantation, transportation is provided.</p> <p>Workers however mentioned they provide their own cutlass for slashing activities and were had little knowledge on the gender committee.</p>	The audit team found an NC with 2.1.1 related to provision of working tools and OFI on 6.1.5 related limited knowledge on the gender committee.
37	Others (Mill and Lab)	Face to face group and individual	<p>It was mentioned that company policies are communicated. Payments are made according to the contract and tasks performed. PPEs are provided as per the risk matrix and free of charge. Medical services are available, and accidents are covered. No accommodation provided since they live in their communities close to the plantation, transportation is provided.</p>	No issue of concern raised

11.4 Consultation with Previous Land User

Total Identified Previous Land User in the Unit of Certification			1	
Sampled Previous Land User in This Audit			1	
Name of Previous Land User	Contact Details (address/telephone/email)	Total Area (Ha)	Date of Consultation	Result of Discussion with Previous Land User
STP-Invest and São Tomé government	Not informed	2400	27.08. 2025	The audit team confirmed through interviews with the local government and document review the historical background of the land. The plantation was first established in 1982, at a time when Free, Prior, and Informed Consent (FPIC) was not required. Following the redefinition of its agricultural policy in São Tomé, a Memorandum of Understanding was signed on March 4, 2009, to establish the Agripalma project. STP-Invest, a Belgian company, took over management. The project's goal was to replant 665 hectares of a previous government project, EMOLVE, and plant additional areas in designated zones. At that time, 88% of Agripalma was owned by STP-Invest, and 12% by the São



				<p>Tomé government. On October 23, 2013, a Socfin subsidiary, Socfinco, purchased STP-Invest's 88% stake.</p> <p>Today, Agripalma has replanted 659 hectares and planted 1,441 hectares, totaling 2,100 hectares of oil palm across the main plantation in Ribeira Peixe and the southern plantation in Porto Alegre. The total concession area is currently 2,400 hectares (665 hectares under Title 409 and 1,735 hectares under Title 410), following the recent return of areas to the government after an FPIC process, as there are no plans for further expansion.</p>
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21. Time Bound Plan

Name of the Management Unit	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status	Plan Year for Certification	Actual Certification Year	New Proposed Year for Certification
PT Socfin Indonesia - Tanah Gambus	Indonesia	Tanah Gambu Mill	0.00	Certified	2011	2011	-
PT Socfin Indonesia - Tanah Gambus	Indonesia	Tanah Gambu Estate	4974.29	Certified	2011	2011	-
PT Socfin Indonesia - Bangun Bandar	Indonesia	Bangun Bandar Mill	0.00	Certified	2011	2011	-
PT Socfin Indonesia - Bangun Bandar	Indonesia	Bangun Bandar Estate	4146.85	Certified	2011	2011	-
PT Socfin Indonesia - Negeri Lama	Indonesia	Negeri Lama Mill	0,00	Certified	2014	2014	-
PT Socfin Indonesia - Negeri Lama	Indonesia	Negeri Lama Estate	2164.8	Certified	2014	2014	-
PT Socfin Indonesia - Mata Pao	Indonesia	Mata Pao Mill	0.00	Certified	2014	2014	-



PT Socfin Indonesia - Mata Pao	Indonesia	Mata Pao Estate	2463.05	Certified	2014	2014	-
PT Socfin Indonesia - Sungai Liput	Indonesia	Sungai Liput Mill	0.00	Certified	2014	2014	-
PT Socfin Indonesia - Sungai Liput	Indonesia	Sungai Liput Estate	3841.96	Certified	2014	2014	-
PT Socfin Indonesia - Aek Loba	Indonesia	Aek Loba Mill	0.00	Certified	2015	2015	-
PT Socfin Indonesia - Aek Loba	Indonesia	Aek Loba Estate	9673.86	Certified	2015	2015	-
PT Socfin Indonesia – Seumanyam	Indonesia	Seumanyam Mill	0.00	Certified	2015	2015	-
PT Socfin Indonesia – Seumanyam	Indonesia	Seumanyam Estate	4446.63	Certified	2015	2015	-
PT Socfin Indonesia – Seunagan	Indonesia	Seunagan Mill	0.00	Certified	2015	2015	-
PT Socfin Indonesia – Seunagan	Indonesia	Seunagan Estate	4505.59	Certified	2015	2015	-

PT Socfin Indonesia - Lae Butar	Indonesia	Lae Butar Mill	0.00	Certified	2015	2015	-
PT Socfin Indonesia - Lae Butar	Indonesia	Lae Butar Estate	4727.4	Certified	2015	2015	-
Okomu Oil Palm Company Main Estate and Extension 1	Nigeria	Okomu Oil Palm Company Main Estate and Extension 1 Mill	0.00	Certified	2019	2020	-
Okomu Oil Palm Company Main Estate and Extension 1	Nigeria	Okomu Oil Palm Company Main Estate	15578.45	Certified	2019	2020	-
Okomu Oil Palm Company Main Estate and Extension 1	Nigeria	Okomu Oil Palm Company Extension 1 Estate	4154	Certified	2024	2024	-
Okomu Oil Palm Company Extension 2	Nigeria	Okomu Oil Palm Company Extension 2 Mill	0.00	Certified	2023	2023	-
Okomu Oil Palm Company Extension 2	Nigeria	Okomu Oil Palm Company Extension 2 Estate	11416	Certified	2023	2023	-
Socfin Agricultural Company (SL) Limited (SAC)	Sierra Leone	SAC Mill	0.00	Certified	2020	2021	-
Socfin Agricultural Company (SL) Limited (SAC)	Sierra Leone	SAC Estate	18473	Certified	2020	2021	-



Société Africaine Forestière et Agricole du Cameroun (Safacam)	Cameroon	Safacam Mill	0.00	Certified	2020	2020	-
Société Africaine Forestière et Agricole du Cameroun (Safacam)	Cameroon	Safacam TF129, TF136, TF180, TF, Bail Ossa	3992.84	Certified	2020	2020	-
Société Africaine Forestière et Agricole du Cameroun (Safacam)	Cameroon	Safacam TF151	11403	Certified	2022	2023	-
Société Africaine Forestière et Agricole du Cameroun (Safacam)	Cameroon	Safacam Provisional Concession	2161.06	Certified	2023	2023	-
La Société des Caoutchoucs de Grand Béréby (SoGB)	Côte D'Ivoire	SOGB Mill	0.00	Certified	2020	2021	-
La Société des Caoutchoucs de Grand Béréby (SoGB)	Côte D'Ivoire	SOGB TF464	6096	Certified	2020	2021	-
La Société des Caoutchoucs de Grand Béréby (SoGB)	Côte D'Ivoire	SOGB TF465, TF466, TF467	28643	Certified	2022	2023	-

Société Camerounaise de Palmeraies (Socapalm) Eséka	Cameroon	Socapalm Eséka Mill	0.00	Certified	2021	2021	-
Société Camerounaise de Palmeraies (Socapalm) Mbongo	Cameroon	Socapalm Mbongo Mill	0.00	Certified	2021	2021	-
Société Camerounaise de Palmeraies (Socapalm) Mbongo	Cameroon	Socapalm Mbongo Estate	6467	Certified	2021	2021	-
Société Camerounaise de Palmeraies (Socapalm) Mbambou	Cameroon	Socapalm Mbambou Mill	0.00	Certified	2021	2021	-
Société Camerounaise de Palmeraies (Socapalm) Mbambou	Cameroon	Socapalm Mbambou Estate	11112	Certified	2021	2021	-
Société Camerounaise de Palmeraies (Socapalm) Edea	Cameroon	Socapalm Edea Mill	0.00	Certified	2021	2022	-
Société Camerounaise de Palmeraies (Socapalm) Edea	Cameroon	Socapalm Edea Estate	7770	Certified	2021	2022	-

Société Camerounaise de Palmeraies (Socapalm) Dibombari	Cameroon	Socapalm Dibombari Mill	0.00	Certified	2021	2022	-
Société Camerounaise de Palmeraies (Socapalm) Dibombari	Cameroon	Socapalm Dibombari Estate	11180.76	Certified	2021	2022	-
Société Camerounaise de Palmeraies (Socapalm) Kienké	Cameroon	Socapalm Kienké Mill	0.00	Certified	2022	2023	-
Société Camerounaise de Palmeraies (Socapalm) Kienké/Camseeds	Cameroon	Socapalm Kienké / Camseeds Estate	21720	Certified	2022	2023	-
Brabanta	RDC	Brabanta Mill	0.00	Certified	2021	2022	-
Brabanta	RDC	Sanga Sanga, Kadima and Kanangai Estates	1528.29	Certified	2021	2022	-
Brabanta	RDC	Lumbundji and Savannah Estates	5971.31	Certified	2023	2023	-



Agripalma	Sao Tome et Principé	Agirpalma Mill	0.00	Certified	2021	2021	-
Agripalma	Sao Tome et Principé	Titulo 409 Estate	665	Certified	2021	2021	-
Agripalma	Sao Tome et Principé	Titulo 410 Estate	1735	Certified	2023	2024	-
Plantations Socfinaf Ghana (PSG)	Ghana	PSG Mill	0.00	Certified	2022	2022	-
Plantations Socfinaf Ghana (PSG)	Ghana	PSG Manso Estate	910.67	Certified	2022	2022	-
Plantations Socfinaf Ghana (PSG)	Ghana	PSG Subri Estate	17242.19	Certified	2024	2024	-



22. Requirements on Multiple Management Unit

Requirement	Findings/Compliance
<p>A time bound plan for certifying all its management units and/or entities, including the units where the organisation has management control and no or minor shareholding has been established by the certification unit.</p>	<p>Applicable</p>
<p>Was the time bound plan submitted during the initial audit?</p>	<p>SOGB is a subsidiary of SOCFIN SA. SOCFIN SA is a registered member of the RSPO with membership number: 1-0269-19-000-00 since February 15, 2019</p> <p>A time bound plan was submitted and evaluated during the initial audit.</p>
<p>Does the time bound plan contain a current list of all estates and mills?</p>	<p>The time bound plan included the current list of all estates and mills.</p>
<p>Does the time bound plan include the certification of all estates and mills within five years after obtaining RSPO membership?</p>	<p>SOGB was certified in 2020. All Socfin estates and mills were certified within this period and 2024.</p>



<p>Are there any new acquisitions of land done by the certification unit since the last audit?</p> <p>If YES, is the time bound plan updated to indicate that the newly acquired land is to be certified within a three-year timeframe?</p>	<p>No</p>
<p>If there are any deviations from these maximum periods, did the Unit of Certification request approval from the RSPO Secretariat?</p>	<p>Note applicable. There were no deviations from the time bound plan since the unit was certified.</p>
<p>Has the CB verified the progress of the time bound plan established by the Unit of Certification during the annual surveillance audit?</p> <p><i>Note: If the CB conducting the surveillance audit differs from the CB that initially accepted the time bound plan, the latter CB must assess the appropriateness of the time bound plan at the time of its first involvement and will only verify its continued appropriateness thereafter.</i></p>	<p>SCS auditors at all audits verified the progress of the time bound plan of Socfin S.A of which SOGB is a subsidiary and reported on it in all audit. SCS conducted the initial certification audit of SOGB and accepted this Socfin S.A timebound plan.</p>
<p>Is there any revision made to the time bound plan?</p> <p>If YES, has the revised time bound plan been reviewed by the CB?</p> <p><i>Note: Changes to the time bound plan are allowed only if the organisation can provide evidence to the CB that these changes are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or Chamber of Commerce (or equivalent).</i></p>	<p>The Socfin time bound plan has been approved by RSPO and no changes has been made since.</p>

<p>Are there any isolated lapses in the implementation of a time bound plan?</p> <p>If YES, a minor non-compliance shall be raised.</p>	<p>There are no isolated lapses in the implementation of the time bound plan. All estates and mills listed in the time bound plan had been certified by 2024.</p>
<p>Is there any evidence of fundamental failure to proceed with the implementation of the plan?</p> <p>If YES, a major non-compliance shall be raised.</p>	<p>All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024.</p>

23. Requirements for Uncertified Management Units

Requirement	Findings/Compliance
<p>Is there any replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3 since 1st January 2010?</p> <p>If YES, did the CB verify that it complies with the RSPO New Planting Procedure (NPP)?</p> <p><i>Note: For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB</i></p>	<p>SOGB is a subsidiary of SOCFIN SA. SOCFIN SA is a registered member of the RSPO with membership number: 1-0269-19-000-00 since February 15, 2019</p> <p>All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024.</p> <p>For all Socfin subsidiaries including SOGB which replaced primary forest or areas required to maintain HCVs, HCV assessments have now been conducted with report submitted in addition to the LUCA report to the RSPO Secretariat.</p> <p>Review of RSPO RaCP Tracker for Socfin SA, https://rspo.org/certification/remediation-and-compensation/racp-tracker#growerTracker:</p> <p>All management units of the group including SOGB have their RaCP approved and under implementation.</p>
<p>Are there any land conflicts reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member?</p> <p>If YES, has it been resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.?</p> <p><i>Note: In case of issues related to land conflicts identified by the CB, details of the status/ progress to resolve such matters shall be clearly explained.</i></p>	<p>All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024 and there are no uncertified units.</p>

<p>Is there any labour dispute reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member?</p> <p>If YES, is it being resolved through a mutually agreed process, per RSPO P&C criterion 4.2?</p> <p><i>Note: In case of an issue related to labour dispute identified by the CB, details of the status/ progress to resolve such matter shall be clearly explained.</i></p>	<p>All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024 and there are no uncertified units.</p> <p>Based on web search, document review and evaluation upon complaints in the RSPO Dispute Settlement Facility, no labour dispute noted.</p>
<p>Is there any legal non-compliance reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member?</p> <p>If YES, has it been addressed through measures consistent with the requirements of RSPO P&C criterion 2.1?</p> <p><i>Note: In case of an issue related to legal non-compliance identified by the CB, details of the status/ progress to resolve such matter shall be clearly explained.</i></p>	<p>All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024 and there are no uncertified units.</p> <p>Based on the audit of the company, there is no labour dispute.</p>
<p>Has a positive assurance statement been provided based on their self-assessment (i.e., internal audit) regarding the requirements for Un-Certified Management Units?<i>Note:</i></p> <p><i>1. This would necessitate evidence of the self-assessment for each requirement.</i></p> <p><i>2. A POSITIVE ASSURANCE statement is MANDATORY to indicate the outcome of self-assessment.</i></p>	<p>Not applicable</p> <p>All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024 and there are no uncertified units.</p>




<p>Did the CB conduct targeted stakeholder consultation (including consultation with the relevant NGO's) to evaluate the compliance related to Requirements on the Un-Certified Management Unit?</p>	<p>Not applicable. All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024 and there are no uncertified units</p>
<p>Did the CB conduct desktop study on the Un-Certified Management Unit to identify risk of any potential non-compliances? <i>Note: (e.g. relevant complaints, labour disputes, land conflicts)</i></p>	<p>Not applicable All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024 and there are no uncertified units</p>
<p>Based on the result of the desktop study, did the CB decide to perform further stakeholder consultation or field inspection to assess the risk of any potential non-compliance with the requirements (as necessary)?</p>	<p>Not applicable All estates and mills listed in the Socfin S.A time bound plan had been certified by 2024 and there are no uncertified units</p>

24. Audit Conclusion & Recommendation

Audit finding	
<input type="checkbox"/>	No nonconformity recorded.
<input checked="" type="checkbox"/>	Minor nonconformity recorded. A corrective action plan has been accepted. Verification of the nonconformity(ies) to be carried out in the next audit.
<input checked="" type="checkbox"/>	Major nonconformity recorded. Evidence of implementation of the corrective actions have been accepted by the audit team. The nonconformity(ies) have been satisfactorily closed out.
Recommendation	
<input type="checkbox"/>	Certification (Initial Certification)
<input checked="" type="checkbox"/>	Continue certification (Annual Surveillance Audit)
<input type="checkbox"/>	Renewal for certification (Recertification)
<input type="checkbox"/>	Not recommended for certification. Reason: (<i>Please provide the reason/ justification</i>)



25. Acknowledgment of Internal Responsibility and Formal Sign-off Assessment Findings

Signing by the Management Unit	
<p>I the undersigned, being the most senior management representative of the operation seeking or holding certification, agree with the contents and audit findings presented in this document.</p> <p>Furthermore, I confirm the following:</p> <ul style="list-style-type: none"> · Acceptance of responsibility in execution of the instructions given. · That this company was made aware that the recommendation of the Audit Team is tentative, pending review and decision by the Certification Decision Maker assigned by the CB. · That during the closing meeting all agenda items were covered by the Audit Team Leader. 	
Acknowledged by:	
Name	Cynthia Van-Dünem
Position	Sustainability Manager
Date	05/02/2026
	
Signature	

Signing by the Audit Team Leader

I, the undersigned, being the Audit Team Leader, confirm that this report accurately reflects the findings and proceedings of the closing meeting. Furthermore, I affirm that the summary of the findings presented in this report is a true and accurate representation of the actual findings of the Audit Team.

Acknowledged by:

Name

Dina Maria Medem Cortés

Position

Lead auditor

Date

19.01.2026

Dina Maria Medem Cortés

Signature

Signing by the Certification Decision Maker

I, the undersigned, being the Certification Decision Maker, confirm that the information and conclusions contained in this report have been prepared in good faith and that the certification decision has been made based upon this information.

Acknowledged by:

Name

Weesmery Navarro Lapeira

Position

Technical Specialist

Date

26.01.2026

Weesmery Navarro L.

Signature



Appendix 1: Location Map Unit of Certification and Supply bases



Map 1. Agripalma Title 409 and Title 410



Image 2. Google Earth Agripalma's Plantation

Appendix 2: History of the changes in the current certification cycle

Assessment Type	Date of Audit	Changes
Annual Surveillance Audit 4	25.08.2025 a 29.08.2025	No changes

Appendix 3: Greenhouse Gas (GHG) Reporting Summary

The GHG emissions produced by the Agripalma (POM and its supply bases) in the period of 01/2024 until 12/2024 have been calculated using the RSPO PalmGHG Calculator (version 4). The assessment team had verified the data input in the PalmGHG Calculator against operations records. The Certification Unit has selected the following options from the PalmGHG Calculator when preparing inputs for the GHG emissions calculations:

- Apply Full Version
- Exclude LUC Emissions

The summary of the Net GHG emitted in 12/2024 for Agripalma (POM and its supply bases) are as following:

1. Summary of Emissions

Description	tCO ₂ eq/t product
CPO	0.96
PK	0.96
PKO	0.00
PKE	0.00

Extraction	tCO ₂ e/t product
OER	22.46
KER	5.26



2. Summary of Plantation/Field Emissions and Sink

Land Use	Ha
OP Planted Area	1879.20
OP Planted on Peat	0
Conservation (Forested)	351.75
Conservation (Non-Forested)	2.02
Total	2,232.97

Production	t/year
FFB Processed	21,107.02
CPO Produced	4741.14

	Own Crop		Group		3rd Party		Total
	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	tCO ₂ e/ tFFB	
Land Conversion	21274.72	1.01	0.00	0.00	0.00	0.00	21274.72
CO ₂ Emission from Fertilizer	105.54	0.01	0.00	0.00	0.00	0.00	105.54
N ₂ O Emission	89.18	0.00	0.00	0.00	0.00	0.00	89.18
Fuel Consumption	266.45	0.01	0.00	0.00	0.00	0.00	266.45
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Crop Sequestration	-17592.57	-0.83	0.00	0.00	0.00	0.00	-17592.57
Sequestration in Conservation Area	-3109.47	-0.15	0.00	0.00	0.00	0.00	-3109.47
Total	1033.85	0.55	0.00	0.00	0.00	0.00	1033.85

**Note: Includes both estates and smallholders (delete whichever not applicable)*



3. Summary of Mill Emission and Credits

	tCO ₂	tCO _{2e} /t FFB
Emission		
POME	4137.33	0.20
Fuel Consumption	446.08	0.02
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	4583.41	0.22

4. Palm Oil Mill Effluent (POME) Treatment

Description	%
Diverted to	100
Divert to anaerobic digestion	100

5. POME Diverted to Anaerobic Digestion

Description	%
Diverted to anaerobic pond	100
Diverted to methane capture (Flaring)	0.00
Diverted to methane capture (electricity generation)	0.00

