



# RSPO P&C CERTIFICATION AUDIT REPORT

Industrial Aceitera de la RAAS S.A

<b>Audit Application Number:</b>	PC26-000099
<b>Assessment Type:</b>	Initial Certification
<b>Date of Audit:</b>	26.05.2025 – 30.05.2025
<b>Audit Report Number:</b>	01
<b>Revision Number:</b>	00
<b>Audit Report Date</b>	15.12.2025



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# 1. Certification Body Background

## 1.1 Description of Certification Body

<b>Certification Body Information</b>	
Name of Certification Body	<b>SCS Global Services</b>
Address of Certification Body (Accredited Office)	<b>2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA</b>
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)	<b>+1.510.452.8000</b>
Websites	<a href="http://www.SCSglobalServices.com">www.SCSglobalServices.com</a>
Contact Person Name	Adriana Cala, RSPO Program Manager
Email	<a href="mailto:acala@scsglobalservices.com">acala@scsglobalservices.com</a>
<b>Accreditation Information</b>	
ASI Code	<b>ASI-APP-002</b>
Technical Scope	<b>RSPO Principles &amp; Criteria and RSPO Supply Chain</b>
Geographical Scope	Worldwide
Accredited Since	12 Jan 2017



## 2. Organisation Details and Certification Scope

### 2.1. Organisational Overview

<b>Management Unit Information</b> <i>Note: Management Unit refers to unit of certification</i>	
Name of Management Unit/s	Industrial Aceitera de la RAAS S.A.
Address of the Management Unit/s	Comunidad Las Limas, Municipio de Kukra Hill, Región Autónoma de la Costa Caribe Sur, Nicaragua.
Country	Nicaragua
Websites	N/A
Description of the Management Unit	<p>The Río Escondido Industrial Extraction Plant began operations in August 2003 in the municipality of Kukra Hill, in Nicaragua's South Caribbean Coast Autonomous Region. Since its creation, the company has been dedicated to the extraction of crude palm oil, using fresh African palm fruit bunches (<i>Elaeis guineensis</i>) as raw material. This specialization has been the plant's sole business activity since its inception, with all its processes geared toward the processing and extraction of crude palm oil.</p> <p>In its initial stage, the plant had an installed capacity of 12 tons per hour, which allowed it to establish stable operations and meet the demand for fresh fruit in the municipality. This initial capacity reflected a basic operational infrastructure, adapted to the availability of fruit at that time and the scale of processing required to meet the company's commercial commitments.</p> <p>In 2012, as part of its institutional consolidation process and with the aim of reflecting its regional identity, the company changed its name, officially adopting the name Industrial Aceitera de la RAAS S.A. (IARAAS). This change reinforced the company's identification within the region's industrial sector and consolidated its administrative and operational structure.</p> <p>By 2025, the company has managed to expand its installed capacity to 65 tons per hour, showing significant growth compared to its initial operations. This increase in processing capacity has been achieved through the incorporation of new machinery, the expansion of extraction and pressing lines, the improvement of storage infrastructure, and the optimization of logistics processes for the reception and handling of fresh fruit. The expanded capacity allows the plant to process larger volumes of fruit on a continuous basis, increasing operational efficiency and ensuring a stable flow of crude palm oil to international markets.</p> <p>Currently, the company generates 160 direct jobs, distributed among plant operators, extraction and maintenance technical staff, laboratory and quality control personnel, logistics, transportation, and administration. Additionally, it supports 200 indirect jobs, including transporters, auxiliary service providers, and other actors linked to the supply chain. The plant's operation has a direct economic impact on Kukra Hill, the surrounding communities, and Nicaragua, mainly through the purchase of fresh fruit, the contracting of logistics services, and the creation of formal employment.</p>



Management Representative Name	José Uriel López
Management Representative Designation	Sustainability Manager
Management Representative Email	julopez@cukra.com

## 2.2.RSPO Membership Information

<b>RSPO Membership Information</b>	
RSPO Membership No.	1-0112-12-000-00
Name of RSPO Member	Compañía Industrial Aceitera Coto Cincuenta y Cuatro S.A
Member Since	12.08.2013



## 2.3. Certificate Information

Certificate Information	
Certificate No.	SCS-RSPOPC-000578
prisma Document Reference Number	N/A
prisma Trading Account ID	TA25-039525
Scope of Certification	Production of CSPO and CSPK 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)	Nicaragua National Interpretation
Initial Date of Certification:	28/02/2026
Effective Date of Certificate:	28/02/2026
Expiry Date of Certificate:	27/02/2031
Name of Peer Reviewer	Ivy Osei-Sampah

### 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
Industrial Aceitera de la RAAS	ML25-001579	Comunidad Las Limas, Municipio de Kukra Hill, Región Autónoma de la Costa Caribe Sur, Nicaragua.	75	12.26502	-83.830033
Remarks: None					

Information of Supply Bases					
Name of Supply Bases	prisma Supply Base ID	Address of Supply Bases	Type of Supply Bases	GPS Coordinates	
				Latitude	Longitude
Ingenio I	SB26-000101	Municipio Kukra Hill, Región Autónoma de la Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.25651	-83.760456
Ingenio II	SB26-000102	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.276933	-83.77317
Cacao Mendoza	SB26-000103	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.304198	-83.771215



La Ceiba	SB26-000104	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.306293	-83.808434
La Palma	SB26-000105	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.290549	-83.827667
Palma Adulta	SB26-000106	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.293786	-83.850005
Ñary Lapas	SB26-000107	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.323615	-83.840203
El Escobal	SB26-000108	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.324456	-83.866027
Las Delicias	SB26-000111	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.302231	-83.915941
Malopi I	SB26-000112	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.272552	-83.876523
Malopi II	SB26-000113	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.26600	-83.912759
Limas San Jose	SB26-000109	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.214895	-83.841820



El Capricho	SB26-000114	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.257169	-83.968867
El Wary	SB26-000115	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.317393	-83.960734
El Borbollón	SB26-000110	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.279839	-83.789469
El Granadillo	SB26-000116	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.327995	-83.947588
El Almendro	SB26-000117	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.373753	-83.958345
La Alianza	SB26-000118	Municipio Kukra Hill, Región autónoma Costa Caribe Sur - Nicaragua	Own/Managed Estate	12.360370	-83.983689



### 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
Ingenio I	686.12	654.48	0	0	11.66	0	0	0	19.98
Ingenio II	725.48	569.31	0	0	69.67	0	0	0	86.5
Cacao Mendoza	599.82	502.98	0	0	25.39	0	0	0	71.45
La Ceiba	731.46	565.48	0	0	2	0	0	0	163.68
La Palma	547.7	469.37	0	0	1.34	0	0	0	76.89
Palma Adulta	601.9	583.22	0	0	0.45	0	0	0	18.2
Ñary Lapas	669	548.78	0	0	106.4	0	0	0	13.82
El Escobal	798.77	576.41	0	0	210.23	0	0	0	12.13
Las Delicias	686.42	604.62	0	0	64.52	0	0	0	17.28
Malopi I	692.06	543.96	0	0	114.24	0	0	0	33.86
Malopi II	749.48	640.93	0	0	97.84	0	0	0	10.7
Limas San Jose	882.49	571.8	0	0	243.16	0	0	0	67.53
El Capricho	709.83	542.08	0	0	143.44	0	0	0	24.31
El Wary	784.5	542.8	0	0	142.21	0	0	0	99.5
El Borbollón	619.64	526.69	0	0	19.42	0	0	0	73.54
El Granadillo	1126.11	724.23	0	0	400.27	0	0	0	1.61
El Almendro	879.22	607.17	0	0	247.29	0	0	0	24.77
La Alianza	926.02	668.66	0	0	247.84	0	0	0	10.02
<b>TOTAL</b>	<b>13416.02</b>	<b>10442.97</b>	0	0	<b>2147.37</b>	0	0	0	<b>825.77</b>

Remarks: None



### 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		
Ingenio I	0	0	0	654.48	654.48	654.48
Ingenio II	0	0	0	569.31	569.31	569.31
Cacao Mendoza	0	0	0	502.98	502.98	502.98
La Ceiba	0	0	0	565.48	565.48	565.48
La Palma	0	0	0	469.37	469.37	469.37
Palma Adulta	282	0	301.22	0	301.22	583.22
Ñary Lapas	0	0	0	548.78	548.78	548.78
El Escobal	0	0	0	576.41	576.41	576.41
Las Delicias	0	0	238.01	366.61	604.62	604.62
Malopi I	0	0	0	543.96	543.96	543.96
Malopi II	0	0	116.23	524.7	640.93	640.93
Limas San Jose	0	0	0	571.8	571.8	571.8
El Capricho	0	0	542.08	0	542.08	542.08
El Wary	10.5	0	532.3	0	532.3	542.8
El Borbollón	0	0	0	526.69	526.69	526.69
El Granadillo	0	0	724.23	0	724.23	724.23
El Almendro	0	0	607.17	0	607.17	607.17
La Alianza	0	0	668.66	0	668.66	668.66
<b>TOTAL (ha)</b>	<b>292.5</b>	<b>0</b>	<b>3729.9</b>	<b>6420.57</b>	<b>10150.47</b>	<b>10442.97</b>

Remarks: None

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)

Name of the Supply Base	Land area (ha) by year					Total Area (Ha)
	2025 (current year)	2026 (current year+ 1)	2027 (current year+ 2)	2028 (current year+ 3)	2029 (current year+ 4)	
Ingenio I	127.90	0	0	0	0	127.90
Ingenio II	46.90	0	0	0	0	46.90
Cacao Mendoza	28.4	0	0	0	0	28.4
La Ceiba	11.10	0	0	0	0	11.10
La Palma	0	0	0	0	0	0
Palma Adulta	0	0	0	0	0	0
Ñary Lapas	78.60	0	0	0	0	78.60
El Escobal	0	0	0	0	0	0
Las Delicias	0	0	0	0	0	0
Malopi I	0	0	0	0	0	0
Malopi II	0	0	0	0	0	0
Limas San Jose	0	0	0	0	0	0
El Capricho	0	0	0	0	0	0
El Wary	0	0	0	0	0	0
El Borbollón	0	0	0	0	0	0
El Granadillo	0	0	0	0	0	0
El Almendro	0	0	0	0	0	0
La Alianza	0	0	0	0	0	0
<b>TOTAL (ha)</b>	<b>292.90</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>292.90</b>

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) N/A

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	
-		-	-	-

### 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	
Roger Duarte Chavez	Independent Smallholder (ISH)	12.241.832	-83.946.197	1834.9
Francisco Jesus Oporta Valle	Independent Smallholder (ISH)	12.284.267	-83.856.126	110.66
Miguel Bolivar Ugarte Reyes	Independent Smallholder (ISH)	12.251.367	-83.801.172	267.73
Jhony Sebastian Ortega Mendez	Independent Smallholder (ISH)	12.275.051	-83.748.972	3.78
Cesar Jarquin Acuña	Independent Smallholder (ISH)	12.277.858	-83.797.653	193.64
Elvin Andino Gutierrez	Independent Smallholder (ISH)	12.262.923	-83.876.533	307.15
Donald Rocha Alvarez	Independent Smallholder (ISH)	12.266.389	-83.824.185	864.19
Denis Antonio Martinez Cruz	Independent Smallholder (ISH)	12.248.338	-83.247.218	14.01
Felix Antonio Perez Torrez	Independent Smallholder (ISH)	12.276.391	-83.852.654	218.4
David Blandon Martinez	Independent Smallholder (ISH)	12.289.793	-83.863.354	177.52
Roger Alfredo Duarte López	Independent Smallholder (ISH)	12.254.792	-83.913.072	1077.17
Ismael Trinidad Moreno Marengo	Independent Smallholder (ISH)	12.250.095	-838.266.769	133.27
Julian Sirias Ibarra	Independent Smallholder (ISH)	12.294.915	-838.536.986	87.74
Domicio Hurtado Gomez	Independent Smallholder (ISH)	12.297.483	-838.578.688	138.39
Valdrack Ludwing Jaentschke Whitaker	Independent Smallholder (ISH)	12.181.059	-83.837.739	365.59



Cruz Manuel Gomez Jaime	Independent Smallholder (ISH)	12.310.963	-83.857.497	173.62
Santos Ignacio Gonzalez Solano	Independent Smallholder (ISH)	12.245.097	-838.435.439	446.08
Justo Salgado Salazar/Lucila Delgadillo Rugama	Independent Smallholder (ISH)	12.321.496	-83.911.178	122.48
Gregorio Antonio Romero Campos	Independent Smallholder (ISH)	12.243.033	-838.387.973	202.15
Oscar Enrique Rodriguez Cardenas	Independent Smallholder (ISH)	12.240.681	-83.852.813	413.57
Guadalupe Urbina/ Ricardo calero	Independent Smallholder (ISH)	12.275.127	-83.937.825	247.39
Felipe Catalino Tellez Matuz	Independent Smallholder (ISH)	12.275.255	-83.934.784	10.19
Marlene Rodriguez Cardena	Independent Smallholder (ISH)	12.243.273	-838.487.227	136.28
Rosaura Alvarez Urbina	Independent Smallholder (ISH)	12.269.923	-83.860.874	385.85
Enriqueta Rodriguez Cardenas	Independent Smallholder (ISH)	12.233.969	-838.468.135	233.8
Dalina Nuvia Rodriguez Cardenas	Independent Smallholder (ISH)	12.231.949	-83.847.216	217.16
Gabriel Rodriguez Cardenas	Independent Smallholder (ISH)	12.229.646	-83.846.682	134.45
Elias Nicasio Rodriguez Cardenas	Independent Smallholder (ISH)	12.239.258	-83.846.259	118.76
Moises Rodriguez Cardenas	Independent Smallholder (ISH)	12.237.894	-83.849.151	88.2
Pablo Rodriguez Rodriguez	Independent Smallholder (ISH)	12.241.167	-83.848.642	105.45
Elgin Abel Rocha	Independent Smallholder (ISH)	12.247.724	-83.851.671	216.47
Jose Inés Davila Lopez	Independent Smallholder (ISH)	12.251.163	-838.283.687	79.51
Napoleon Rocha Alvares	Independent Smallholder (ISH)	12.249.067	-83.853.457	207.97
Dionicio Blanco Martinez	Independent Smallholder (ISH)	12.262.398	-838.429.427	41.22
Eligio Noel Barrera Funes	Independent Smallholder (ISH)	12.251.263	-83.921.555	512.16
Cristina aguilar Mendez /Luis Gutierrez	Independent Smallholder (ISH)	12.250.761	-84.019.878	243.48
Dominga Gutierrez /Alejandro Jarquin	Independent Smallholder (ISH)	12.271.871	-83.898.765	337.4
Jose Rodolfo Diaz Rodriguez	Independent Smallholder (ISH)	12.291.799	-838.857.418	124.53
Ismael Gonzalo Vasquez Rivas	Independent Smallholder (ISH)	12.312.734	-83.906.785	336.55
Marta Lopez Zamora	Independent Smallholder (ISH)	12.271.513	-838.903.372	191.27
Thelma Areli Jaime Urbina	Independent Smallholder (ISH)	12.295.007	-838.660.923	46.22
Rufino Colindrez Urbina	Independent Smallholder (ISH)	12.280.348	-83.847.627	671.07
Jesus Bello Ordeñana	Independent Smallholder (ISH)	12.288.043	-838.841.475	80.26
Elvin Antonio Jarquin Obando	Independent Smallholder (ISH)	12.277.798	-839.073.171	36.22
Roberto Carlos Campos Arguello.	Independent Smallholder (ISH)	12.267.772	-83.973.885	187.98
Pablo Campos	Independent Smallholder (ISH)	12.269.638	-83.971.985	242.492
Felix Pedro Gutierrez Méndez/Lorenzo Antonio Valle Zamora	Independent Smallholder (ISH)	12.256.688	-84.006.084	364.15
Jose santos Gudiel Garcia	Independent Smallholder (ISH)	12.301.332	-83.941.995	444.99
Gabriel Avila Castro #2	Independent Smallholder (ISH)	12.260.949	-83.897.567	1667.18
Julia Perez Solano	Independent Smallholder (ISH)	12.285.519	-838.138.492	123.1
Alejandro Ali Jaime Urbina	Independent Smallholder (ISH)	12.323.793	-83.916.463	27.77



Jose Esteban Gonzalez Torres	Independent Smallholder (ISH)	12.338.171	-83.834.636	328.07
Manuel Martinez	Independent Smallholder (ISH)	12.270.091	-839.041.757	110.31
Braulia Carrillo Concepción	Independent Smallholder (ISH)	12.257.971	-83.776.648	435.63
Ernesto Toledo Méndez	Independent Smallholder (ISH)	12.353.917	-838.883.445	85.8
Jose Anastacio Blanco Sanchez.	Independent Smallholder (ISH)	12.248.916	-83.860.251	40.33
German Horacio Molina Barrera	Independent Smallholder (ISH)	12.349.199	-83.891.277	182.99
Griselda del Socorro Perez	Independent Smallholder (ISH)	12.270.654	-83.858.878	72.41
Santos Catalino Gomez Taleno	Independent Smallholder (ISH)	12.317.372	-83.835.362	460.92
Simona Isable Hurtado Perez	Independent Smallholder (ISH)	12.281.041	-838.575.805	441.9
Basilio Antonio Guillen Leon	Independent Smallholder (ISH)	12.375.272	-83.940.679	220.4
Santos Bayardo Sequeira Mendoza	Independent Smallholder (ISH)	12.365.521	-83.948.158	193.27
Nica Palm	Independent Smallholder (ISH)	12.239.176	-83.844.196	10369.88
Jose Feliciano Amador/Maria Luisa Gomez	Independent Smallholder (ISH)	12.310.094	-838.336.123	83.52
Lucio Guillermo Soza Gomez	Independent Smallholder (ISH)	12.289.474	-839.046.764	57.85
Gleydis Marbelia Medrano Mena	Independent Smallholder (ISH)	12.249.619	-83.894.719	100.92
Ariel Gutierrez Mendez	Independent Smallholder (ISH)	12.236.562	-84.019.918	217.36
Cesar Garcia Dominguez	Independent Smallholder (ISH)	12.289.131	-83.852.166	469.45
Gregoria del Carmen Valle Urbina	Independent Smallholder (ISH)	12.237.996	-84.020.658	229.16
Maria Modesta Cruz Rizo	Independent Smallholder (ISH)	12.268.687	-83.968.297	262.88
Jose Ignacio Canales Fajardo	Independent Smallholder (ISH)	12.322.249	-83.972.282	196.04
Juana Aleman	Independent Smallholder (ISH)	12.274.029	-839.350.415	80.37
Gabriel Rafael Lumbi Hurtado	Independent Smallholder (ISH)	12.242.057	-83.922.294	15.14
Gerardo Jonathan Barrera Ortega	Independent Smallholder (ISH)	12.245.264	-83.920.547	51.95
Juan Antonio Lopez Sanchez	Independent Smallholder (ISH)	12.236.339	-83.937.998	106.26
Cristino Gutierrez Oporta	Independent Smallholder (ISH)	12.275.995	-839.069.579	36.29
Roberto Obando Martinez	Independent Smallholder (ISH)	12.232.942	-83.948.078	198.64
Juan De La Cruz Reyes Urbina	Independent Smallholder (ISH)	12.273.617	-83.846.237	261.37
Rodolfo Antonio Garcia Fonseca	Independent Smallholder (ISH)	12.296.593	-838.704.265	523.66
David Miguel Borge Urbina	Independent Smallholder (ISH)	12.289.486	-83.882.652	156.44
Clemente Canales Fajardo	Independent Smallholder (ISH)	12.324.624	-83.974.172	3.62
Juan Molinares Rivas/Isaac Molinares	Independent Smallholder (ISH)	12.407.611	-83.947.726	263.42
Marvin A. Mena Blandon	Independent Smallholder (ISH)	12.279.855	-83.865.716	926.61
Yeymi Yasary Lopez Canales	Independent Smallholder (ISH)	12.256.319	-839.339.047	93.09
Bagner Walter Sotelo Padilla	Independent Smallholder (ISH)	12.303.099	-83.811.579	789.26
Juan de Dios Garcia Ramirez	Independent Smallholder (ISH)	12.340.816	-83.882.899	104.81
Victor Andres Laguna Ugarte	Independent Smallholder (ISH)	12.252.033	-83.821.753	247.21
Ramiro Barrera Funes	Independent Smallholder (ISH)	12.237.819	-839.133.047	103.46
Francisco Jaime Duarte	Independent Smallholder (ISH)	12.380.437	-83.950.261	162.55



Zenaida Cruz Alvarez	Independent Smallholder (ISH)	12.295.685	-838.563.133	191.84
Mariana Fonseca Saravia	Independent Smallholder (ISH)	12.248.613	-83.828.877	211.88
Bismark Antonio Hurtado Marin	Independent Smallholder (ISH)	12.338.818	-83.977.335	21.91
Maria Eliza Gatita Suarez	Independent Smallholder (ISH)	12.353.514	-83.892.298	184.08
Elvin Ariel Andino Villega	Independent Smallholder (ISH)	12.259.843	-83.875.769	33.29
Yessica Angelica Medrano	Independent Smallholder (ISH)	12.248.973	-838.928.954	89.71
Belquis Yenoris Medrano	Independent Smallholder (ISH)	12.251.518	-83.891.386	184.85
Yojairo Yamal Rodriguez Jerez	Independent Smallholder (ISH)	12.278.729	-83.756.086	28.57
Ada Francis Mena Hernandez	Independent Smallholder (ISH)	12.256.027	-83.896.756	1545.99
Sergio Anselmo Gómez Calderón	Independent Smallholder (ISH)	12.247.583	-83.910.432	1558.43
Jairo Antonio Gutierrez Méndez	Independent Smallholder (ISH)	12.252.662	-84.027.223	138.84
Yader Ramon Gómez Guzman	Independent Smallholder (ISH)	12.277.467	-838.527.136	163.13
Bismarck González Solano	Independent Smallholder (ISH)	12.251.327	-83.846.548	182.92
Lucila Marín Reyes	Independent Smallholder (ISH)	12.316.555	-838.364.377	37.68
Estevan Canales Fajardo	Independent Smallholder (ISH)	12.317.626	-839.698.955	137.67
David Rodriguez Blandon	Independent Smallholder (ISH)	12.233.213	-83.943.852	12.61
Matilde Segura Ruiz	Independent Smallholder (ISH)	12.306.053	-83.894.091	342.24
Pilar Serafín Vasquez Lanuza	Independent Smallholder (ISH)	12.275.762	-83.849.832	214.34
Leonardo Jesus Lacayo Jiron	Independent Smallholder (ISH)	12.288.094	-838.557.766	105.44
Guillermo Blandon Romero	Independent Smallholder (ISH)	12.286.723	-838.596.114	54.8
Alberto Mendoza Aguirre	Independent Smallholder (ISH)	12.335.068	-83.878.097	474.41
Alfredo Castillo Diaz	Independent Smallholder (ISH)	12.281.164	-83.855.789	379.25
Barney Roger Henriquez Hooker	Independent Smallholder (ISH)	12.252.893	-83.746.235	107.25
Eugenio Tellez Ortiz	Independent Smallholder (ISH)	12.287.088	-837.996.244	216.41
German Emilio Medrano	Independent Smallholder (ISH)	12.284.248	-83.851.988	363.29
Isidra Selsa Guzman Miranda	Independent Smallholder (ISH)	12.278.178	-838.545.367	72.14
Juana Elena Romero	Independent Smallholder (ISH)	12.276.595	-838.624.224	88.75
Dionicio Blandon Romero	Independent Smallholder (ISH)	12.246.451	-83.761.567	166.03
Rafaela Romero Blandon	Independent Smallholder (ISH)	12.277.281	-83.860.346	127
Ramon Santos Mairena Moreno	Independent Smallholder (ISH)	12.277.337	-83.857.952	227.94
Roger Godolfino Gutierrez Cruz	Independent Smallholder (ISH)	12.261.713	-83.780.314	158.24
Winston Welinston Putchie Brown	Independent Smallholder (ISH)	12.253.833	-837.491.422	49.03
Alejandro Gutierrez García	Independent Smallholder (ISH)	12.276.798	-83.864.612	354.41
Samuel Fajardo Mendez	Independent Smallholder (ISH)	12.307.729	-838.533.553	185.94
Secundino Salazar Bello	Independent Smallholder (ISH)	12.308.921	-83.830.724	328.87
Eddy Jaime Duarte	Independent Smallholder (ISH)	12.291.922	-83.855.661	562.8
Andy Gonzalo Ugarte Chavarría	Independent Smallholder (ISH)	12.249.672	-837.997.659	95.26
Angela Mendez Fajardo	Independent Smallholder (ISH)	12.328.069	-838.467.116	104.83



Benjamín Membreño Escobar	Independent Smallholder (ISH)	12.301.356	-83.815.516	113.79
Daniel Santos Sequeira Robleto	Independent Smallholder (ISH)	12.240.467	-83.919.968	248.87
Denis Taleno Aragón	Independent Smallholder (ISH)	12.298.489	-83.869.475	172.14
Dionicio René Martínez Castillo	Independent Smallholder (ISH)	12.253.029	-837.789.413	116.48
Efrain Blandon Cruz	Independent Smallholder (ISH)	12.260.572	-83.925.239	7570.22
Eligio Andres Miranda	Independent Smallholder (ISH)	12.261.912	-83.793.599	44.58
Francisco Ant. Hurtado Gonzáles	Independent Smallholder (ISH)	12.321.778	-83.841.828	472.26
Francisco Vega Villegas	Independent Smallholder (ISH)	12.306.724	-83.886.372	555.91
German Jose Romero Campos	Independent Smallholder (ISH)	12.308.999	-83.880.429	232.02
Eladio Blandon Romero	Independent Smallholder (ISH)	12.281.639	-83.851.671	417.78
Monkasa	Independent Smallholder (ISH)	12.203.057	-83.819.879	952.55
Jorge Ulices Castillo Ubeda	Independent Smallholder (ISH)	12.251.124	-83.943.478	122.75
Jorge H. Chavarría Castillo	Independent Smallholder (ISH)	12.252.389	-83.792.222	211.06
Jose Andres Laguna Dominguez	Independent Smallholder (ISH)	12.255.052	-83.825.605	350.55
Jose Antonio Lopez Vargas	Independent Smallholder (ISH)	12.252.561	-83.948.849	139.11
Jose Israel Mendez Fajardo	Independent Smallholder (ISH)	12.331.137	-838.492.173	184.44
Leopoldo Valle Casanova	Independent Smallholder (ISH)	12.251.591	-837.791.821	55.79
Teodoro Gutierrez Perez	Independent Smallholder (ISH)	12.256.316	-83.752.238	143.21
Loendy Garcia Obando	Independent Smallholder (ISH)	12.305.442	-838.902.623	87.98
Luis Concepcion Chavez	Independent Smallholder (ISH)	12.257.876	-83.948.787	205.25
Miguel Angel Garbanzo	Independent Smallholder (ISH)	12.253.235	-83.950.653	485.89
Pedro Hernández López	Independent Smallholder (ISH)	12.242.415	-83.816.934	155.61
Mario Antonio Barrera Figueroa	Independent Smallholder (ISH)	12.241.566	-839.173.314	263.71
Peter Albert Martinez Fox	Independent Smallholder (ISH)	12.271.799	-83.924.246	242.81
Telma Canales Fajardo	Independent Smallholder (ISH)	12.259.189	-839.311.821	199.47
Francisco Jose Martinez Cruz	Independent Smallholder (ISH)	12.243.755	-838.263.378	90.18
Efrain Martinez Angulo	Independent Smallholder (ISH)	12.242.651	-83.825.664	127.99
Jesus Carmelo Martinez Cruz	Independent Smallholder (ISH)	12.250.329	-838.258.222	136.17
Ramiro Ramon Martinez Cruz	Independent Smallholder (ISH)	12.248.219	-83.826.348	104.98
Marcos Mendez Fajardo	Independent Smallholder (ISH)	12.333.049	-83.851.734	355.78
Ignacio Guzman Suarez	Independent Smallholder (ISH)	12.261.844	-83.859.275	628.16
Walter Danilo Mendoza Soto	Independent Smallholder (ISH)	12.248.375	-83.971.944	1701.76
Felipe Torrez	Independent Smallholder (ISH)	12.333.625	-838.336.189	111.7
Guadalupe Ignacio Moreno Aly	Independent Smallholder (ISH)	12.335.254	-838.310.725	190.17
Santos Alexander Urbina F.	Independent Smallholder (ISH)	12.382.263	-83.953.677	57.5
Justino Marin Reyes	Independent Smallholder (ISH)	12.319.352	-83.837.519	458.43
Maria Elvia Estrada Taleno	Independent Smallholder (ISH)	12.285.765	-83.949.278	123.33
Adilia de Jesus Raudez García	Independent Smallholder (ISH)	12.238.998	-83.835.529	497.95



Deyvin Duvalier Garcia Ugarte	Independent Smallholder (ISH)	12.265.449	-838.266.263	69.65
Israel de los Angeles Gudiel Taleno	Independent Smallholder (ISH)	12.289.932	-83.953.608	51.83
Tomas Fonseca Rio	Independent Smallholder (ISH)	12.339.002	-83.835.399	41.91
Walter Danilo Rivera Vilchez	Independent Smallholder (ISH)	12.260.611	-83.757.024	345.71
Pedro Pablo Lumbi	Independent Smallholder (ISH)	12.242.057	-83.922.294	317.23
Marina Isabel Rosales Campos	Independent Smallholder (ISH)	12.275.255	-83.934.784	38.57
Socorro Aurelio Valle Zamora	Independent Smallholder (ISH)	12.232.373	-84.023.254	48.69
Modesto Reyes Gutierrez	Independent Smallholder (ISH)	12.245.377	-840.243.126	10.57
Mario Gerardo Jaimes Calderón/Teresa García Fonseca	Independent Smallholder (ISH)	12.264.289	-83.774.866	67.01
Jose Antonio Vazquez Ugarte	Independent Smallholder (ISH)	12.243.237	-83.823.648	10.47
Arlys Membreño Duarte	Independent Smallholder (ISH)	12.302.825	-83.818.544	21.6
			<b>TOTAL</b>	<b>65,548.44</b>



### 3.6 Projected Certified Volume for Next License

Information of New License		
<b>Next License Period</b>	Start Date	28 02 2026
	End Date	27 02 2027
<b>Projected Certified FFB Volume (MT)</b>	180,670	
<b>Average Production Yield (MT/ Ha)</b>	17.3	
<b>Projected CSPO Certified Volume (MT)</b>	Identity Preserved	41,554.1
	Mass Balance	-
<b>Projected CSPK Certified Volume (MT)</b>	Identity Preserved	9,033.5
	Mass Balance	-
<b>Oil Extraction Rate (OER) (%)</b>	23	
<b>Kernel Extraction Rate (KER) (%)</b>	5	



### 3.7 Information of Previous & Current License (Identity Preserved)

Name of Palm Oil Mill	Industrial Aceitera de la RAAS S.A			
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)	-		-	
Projected CSPK Certified Volume (MT)	-		-	
Actual CSPK Production Volume (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)	-		-	

\*No information is available on previous and current licenses, as this is an initial certification audit.



### 3.8 Information of Previous & Current License (Mass Balance)

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 **Industrial Aceitera de la RAAS S.A** to the RSPO Principles and Criteria Generic RSPO Certification Systems document and **Industrial Aceitera de la RAAS S.A** 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 **Industrial Aceitera de la RAAS S.A** 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

<b>Name</b>	<b>Role</b>	<b>CAB Auditor Number</b>
Weesmery Navarro Lapeira	Lead Auditor	ASI12SAXDA
Jose Alfredo Torrez	Team Auditor 1	ASI1MLVVPO
Joel Argueta	Team Auditor 2	ASI1WSS3LK
Laura Reyes Paez	Team Auditor 3	ASI1YTSB5L



### 4.3. Audit Plan

Date	Time	CAB Auditor Number	Location	Activity
<b>Day 1: Oil Mill office</b>				
26.05.2025	08.00 am - 09.00 am	All	Oil Mill Office	<p><b>Opening Meeting:</b> Introductions, client update, review audit scope, audit plan, intro/update to P&amp;C RSPO standard and protocols.  <b>Indicator:</b> N/A</p>
26.05.2025	09:00 am – 12:00 pm 01:00 pm – 5:00 pm	<b>WN - ASI12SAXDA</b>	Oil Mill Office	<p><b>Operate Legally and respect rights.</b>  <b>Indicator:</b> 2.1.1, 2.1.2, 2.2.1, 2.2.2, 2.2.3</p> <ul style="list-style-type: none"> <li>- Legal requirements System for ensuring legal compliance.</li> <li>- List of contracted parties.</li> <li>- Contracts and specific clauses</li> <li>- Origin of fresh fruit bunches (FFB) - Directly sourced FFB, smallholder, indirectly sourced FFB.</li> <li>- Contracts including those for FFB supply and specific clauses. (Applicable legal requirements, disallowing child, forced and trafficked labour. for young workers employ the contracts include a clause for their protection).</li> <li>- Origin of fresh fruit bunches (FFB) - Directly sourced FFB, smallholder.</li> <li>- Indirectly sourced FFB (collection centers, agents, or other intermediaries)</li> <li>- Geo-location of FFB origins</li> <li>- Proof of the ownership status or the right/claim to the land by the grower/smallholder</li> <li>- Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul> <p>* Time Bound Plan</p>
26.05.2025	09:00 am – 12:00 pm 01:00 pm	<b>JT ASI1MLVVPO</b>	Oil Mill Office	<p><b>H&amp;S (farms) - Documents review</b>  <b>Indicator :</b> 2.1.1, 3.3.1, 3.6.1, 3.6.2, 3.7.2, 6.7, 7.2.10, 7.2.11</p> <ul style="list-style-type: none"> <li>- H&amp;S SOPsSOPS</li> <li>- Risk assessment and controls.</li> <li>- Monitoring of H&amp;S plan</li> <li>- Emergency procedures and Accidents.</li> </ul>



	– 5:00 pm			<ul style="list-style-type: none"> <li>- Health and safety training.</li> <li>- Medical follow-up of workers.</li> <li>- PPE's</li> <li>- Legal compliance</li> </ul> <p><b>Environmental (farms) -Documents review</b>  <b>Indicator : 2.1.1, 3.2.1, 3.3.1, 3.4, 3.7.2, 7.3, 7.8.1, 7.8.2, 7.12</b></p> <ul style="list-style-type: none"> <li>- Waste Management</li> <li>- EIA (Environmental Impact Assessment).</li> <li>- Monitoring and continuous Improvement plan</li> <li>- SOPsSOPS Environmental</li> <li>- HCV - LUC</li> <li>- Remediation and Compensation plan.</li> <li>- Legal matrix, permits</li> </ul>
26.05.2025	<p>09:00 am – 12:00 pm</p> <p>01:00 pm – 5:00 pm</p>	<p><b>JA</b> <b>ASI1WSS3LK</b></p>	<p>Oil Mill Office</p>	<p><b>Agronomic – Documents review</b>  <b>Indicator: 2.1.1, 3.1.2, 3.3, 7.1, 7.2, 7.4, 7.5, 7.6, 7.7, 7.11</b></p> <ul style="list-style-type: none"> <li>- Good agricultural practices</li> <li>- IMP</li> <li>- Use of fire</li> <li>- Pesticide use and reduction plan</li> <li>- SOPS Agronomy</li> <li>- Marginal and fragile soils</li> <li>- Soil surveys and topographic Information</li> <li>- Tissue monitoring</li> <li>- Nutrient recycling strategy</li> <li>- Water Management</li> <li>- Annual replanting programmed projected for a minimum of five years.</li> <li>- Aerial spraying</li> <li>- Fire prevention and control measures (adjacent stakeholders).</li> <li>- Table of areas</li> <li>- Annual replanting programmed projected for five years (detailed plan)</li> <li>- Legal compliance</li> <li>- Records / Cholinesterase tests and entrance and periodical</li> </ul>



				<p>tests</p> <p><b>Environmental Documents and records review</b>  <b>Indicator:</b> 7.9.1, 7.10.1, 7.10.2, 7.10.3</p> <ul style="list-style-type: none"> <li>- Energy Management</li> <li>- GHG Calculator and GHG emissions publicly reported.</li> </ul>
26.05.2025	<p>09:00 am – 12:00 pm</p> <p>01:00 pm – 5:00 pm</p>	<p><b>LR</b> <b>ASI1YTSB5L</b></p>	Oil Mill Office	<p><b>Ethical and transparent behavior and Respect community and human rights and deliver benefits</b>  <b>Indicator:</b> 1.1, 1.2, 4.1, 4.2, 4.4.1</p> <ul style="list-style-type: none"> <li>- Policy for ethical conduct</li> <li>- Consultation and communication procedure and records.</li> <li>- Policy to respect human rights</li> <li>- Grievances procedure and records (external).</li> <li>- Stakeholders list</li> <li>- Documents showing legal ownership or lease, or authorized use of Customary land authorized by customary landowners.</li> </ul> <p><b>Human Resources and social issues (farms) - Documents review</b>  <b>Indicator:</b> 2.1.1, 3.3, 3.5, 3.7.1, 3.7.2, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6</p> <ul style="list-style-type: none"> <li>- Legal matrix (HR)</li> <li>- HR procedures review</li> <li>- Records of implementation of HR procedures</li> <li>- Wages and benefits of workers</li> <li>- Communication Log and Procedures</li> <li>- Training plan and records</li> <li>- Respect of workers' rights</li> <li>- Prevalent Wage Social</li> <li>- Protection of children</li> <li>- Sexual harassment Policy</li> <li>- Non-discrimination policy</li> <li>- Freedom of association and right to collective bargaining</li> <li>- Gender Committee</li> <li>- Reproductive rights policy</li> </ul>
26.05.2025	12.00 pm –			<b>Lunch</b>



	01.00 pm			
26.05.2025	5.00 pm			<b>End of day 1</b>
<b>Day 2: Visit to farm Lima San Jose and La Palma – Oil Mill</b>				
27.05.2025	07.30 am - 12.00 pm 01.00 pm – 05.00 pm	<p style="text-align: center;"><b>JA</b> <b>ASI1WSS3LK</b></p> <p style="text-align: center;"><b>JT</b> <b>ASI1MLVVPO</b></p>	<p style="text-align: center;">Farm <b>Lima San Jose</b></p> <p style="text-align: center;">Farm <b>La Palma</b></p>	<p><b>Agronomic, Environmental, H&amp;S, field visit and records review:</b></p> <p><b>Indicator:</b> 2, 3, 4, 6, 7</p> <ul style="list-style-type: none"> <li>- Worker’s interview (procedures, policies, grievance mechanism)</li> <li>- Internal Stakeholder consultation (Health and safety committee, Gender committee and workers committee)</li> <li>- Maps</li> <li>- IMP</li> <li>- Good Agricultural Practices</li> <li>- Soil Management (Erosion, soil degradation and fragile soils)</li> <li>- Application records for agrochemical and fertilizers - Justification</li> <li>- Use of PPE’s</li> <li>- Use of fire and agrochemical</li> <li>- Storages: agrochemical, fertilizers, waste, fuels</li> <li>- Water management in the field</li> <li>- Accident and first aid procedures</li> <li>- Identifying workplace hazards</li> <li>- Waste Management</li> <li>- HCV</li> <li>- Legal or authorized boundaries are clearly demarcated</li> <li>- Training records</li> </ul>
27.05.2025	07.30 am- 12.00 pm 01.00 pm – 05.00 pm	<p style="text-align: center;"><b>LR</b> <b>ASI1YTSB5L</b></p>	<p style="text-align: center;">Oil Mill Office</p>	<p><b>Respect community and human rights and deliver benefits</b></p> <p><b>Indicator :</b> 4.3.1, 4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6, 4.5, 4.6, 4.7, 4.8</p> <ul style="list-style-type: none"> <li>- Free Prior and Informed Consent -FPIC (new and current operations)</li> <li>- Benefits to the community</li> <li>- Customary Rights</li> <li>- Compensation for loss of legal, customary or user rights</li> <li>- Participatory Maps</li> </ul>



				<b>Social issues</b> <b>Indicator: 3.4</b> - SIA (Social Impact Assessment) and monitoring
27.05.2025	07.30 am- 12.00 pm  01.00 pm – 05.00 pm	<b>WN</b> <b>ASI12SAXDA</b>	Oil Mill Office	<b>Optimize productivity, efficiency, positive impacts, and resilience.</b> <b>Indicator: 3.1.1, 3.1.2, 3.1.3, 3.2.1, 3.2.2</b> - Business Plan and monitoring. - Annual replanting programmed projected for a minimum of five years (general plan included in the business plan) - Plan for continuous improvement - Corrective actions – Internal audit. - Metric  <b>Support Smallholder Inclusion and FFB suppliers</b> <b>Indicator: 5.1, 5.2</b>
27.05.2025	12.00 pm – 01.00 pm	<b>Lunch</b>		
27.05.2025	05.00 pm	<b>End of day 2</b>		
<b>Day 3: Visit to farm Palma Adulta and Stakeholders consultation – Oil Mill</b>				
28.05.2025	07.30 am - 8.00 am	<b>WN</b> <b>ASI12SAXDA</b>	Oil Mill Office	<b>Meet with management- review day 1 and 2 findings.</b>
28.05.2025	07.30 am - 12.00 pm  01.00 pm – 05.00 pm	<b>JA</b> <b>ASI1WSS3LK</b>  <b>JT</b> <b>ASI1MLVVPO</b>	Farm <b>Palma Adulta</b>	<b>Agronomic, Environmental, H&amp;S, field visit and records review:</b> <b>Indicator: 2, 3, 4, 6, 7</b> - Worker's interview (procedures, policies, grievance mechanism) - Internal Stakeholder consultation (Health and safety committee, Gender committee and workers committee) - Maps - IMP - Good Agricultural Practices - Soil Management (Erosion, soil degradation and fragile soils) - Application records for agrochemical and fertilizers - Justification



				<ul style="list-style-type: none"> <li>- Use of PPE's</li> <li>- Use of fire and agrochemical</li> <li>- Storages: agrochemical, fertilizers, waste, fuels</li> <li>- Water management in the field</li> <li>- Accident and first aid procedures</li> <li>- Identifying workplace hazards</li> <li>- Waste Management</li> <li>- HCV</li> <li>- Legal or authorized boundaries are clearly demarcated</li> <li>- Training records</li> </ul>
28.05.2025	08.00 am - 12.00 pm  01.00 pm – 05.00 pm	<b>WN</b> <b>ASI12SAXDA</b>	Oil Mill	<p><b>Supply Chain- Mill IP Module - Site Walk -through:</b>  <b>Observe environmental and H&amp;S</b>  <b>Indicator: 3.7.3, 3.8</b></p> <ul style="list-style-type: none"> <li>- Production process, weighbridge, storage facilities and critical control points, worker interview.</li> </ul> <p><b>Document review</b></p> <ul style="list-style-type: none"> <li>- Demonstration of legal entity</li> <li>- Roles and responsibility</li> <li>- Outsourcing activities</li> <li>- Procedures/manual/SOP</li> <li>- Records of purchase – FFB</li> <li>- Records of sales–CPO</li> <li>- Palm trace transactions</li> <li>- ERP system</li> <li>- Records of Goods in and Goods out</li> <li>- RSPO logo &amp; claims</li> <li>- Estimated tonnage.</li> <li>- Table of areas</li> <li>- Fruit suppliers</li> <li>- Training Plan and records</li> <li>- Record keeping</li> <li>- Internal Audit</li> <li>- Management review</li> <li>- Market communication and claims</li> </ul>
28.05.2025	07.30 am - 12.00 pm	<b>LR</b> <b>ASI1YT5B5L</b>	TBD	<p><b>Internal Stakeholder consultation</b>  <b>Indicator: 1, 2, 4, 6</b></p>



				<ul style="list-style-type: none"> <li>- Health and safety committee.</li> <li>- Workers' representative</li> <li>- Gender committee</li> <li>- Subcontractors Companies (CPO transporters, security forces, and restaurant)</li> </ul>
28.05.2025	12.00 pm - 01.00 pm			<b>Lunch</b>
28.05.2025	01.00 am – 05.00 pm	<b>LR ASI1YTSB5L</b>	TBD	<b>External Stakeholder consultation Indicator: 1, 2, 4, 6</b>
28.05.2025	5.00 pm			<b>End of day 3</b>
<b>Day 4: Visit to farm El Almendro and Oil Mill</b>				
29.05.2025	07.30 am - 8.00 am	<b>WN ASI12SAXDA</b>	Oil Mill Office	<b>Meet with management- review day 3 and Stakeholder consultation findings.</b>
29.05.2025	07.30 am - 12.00 pm 01.00 pm – 05.00 pm	<b>JA ASI1WSS3LK JT ASI1MLVVPO</b>	Farm <b>El Almendro</b>	<b>Agronomic, Environmental, H&amp;S, field visit and records review:</b> <b>Indicator: 2, 3, 4, 6, 7</b> <ul style="list-style-type: none"> <li>- Worker's interview (procedures, policies, grievance mechanism)</li> <li>- Internal Stakeholder consultation (Health and safety committee, Gender committee and workers committee)</li> <li>- Maps</li> <li>- IMP</li> <li>- Good Agricultural Practices</li> <li>- Soil Management (Erosion, soil degradation and fragile soils)</li> <li>- Application records for agrochemical and fertilizers - Justification</li> <li>- Use of PPE's</li> <li>- Use of fire and agrochemical</li> <li>- Storages: agrochemical, fertilizers, waste, fuels</li> <li>- Water management in the field</li> <li>- Accident and first aid procedures</li> <li>- Identifying workplace hazards</li> <li>- Waste Management</li> <li>- HCV</li> </ul>



				<ul style="list-style-type: none"> <li>- Legal or authorized boundaries are clearly demarcated</li> <li>- Training records</li> </ul>
29.05.2025	08.00 am - 12.00 pm 01.00 pm – 05.00 pm	<b>WN</b> <b>ASI12SAXDA</b>	Oil Mill	<b>H&amp;S and Environmental (Oil Mill)</b> <b>H&amp;S documents review (Oil Mill).</b> <b>Indicator : 2.1.1, 3.3.1, 3.6.1, 3.6.2, 6.7</b> <ul style="list-style-type: none"> <li>- H&amp;S SOPS</li> <li>- Risk assessment and controls.</li> <li>- Monitoring of H&amp;S plan</li> <li>- Emergency procedures and Accidents.</li> <li>- Identifying workplace hazards</li> <li>- Health and safety training.</li> <li>- Medical follow-up of workers.</li> <li>- Legal compliance</li> </ul> <b>Environmental documents review (Oil Mill)</b> <b>Indicator : 2.1.1, 3.4, 7.8.3, 7.8.4</b> <ul style="list-style-type: none"> <li>- Environmental Impact Assessment and monitoring</li> <li>- Waste Management</li> <li>- Water management</li> <li>- Mill effluents</li> <li>- Legal compliance</li> </ul>
29.05.2025	08.00 am - 12.00 pm 01.00 pm – 05.00 pm	<b>LR</b> <b>ASI1YTSB5L</b>	Oil Mill	<b>Social and Labour (Oil Mill and Fram)</b> <b>Indicator : 3, 4, 6</b> <ul style="list-style-type: none"> <li>- Employment Contracts</li> <li>- Related documents detailing payments and conditions of employment</li> <li>- Pay slips</li> <li>- Follow up on any issues depending on and collecting final evidence.</li> </ul>
29.05.2025	12.00 pm- 01.00 pm	<b>Lunch</b>		
29.05.2025	05.00 pm	<b>End of day 4</b>		
<b>Day 5: Closing meeting - office</b>				
30.05.2025	08.00 am – 10.00 am	All	Oil Mill Office	<b>Health and Safety, Environmental, agronomic, social labour Pending topics</b>



				<b>Indicator : 1, 2, 3, 4, 5, 6, 7</b> Follow up on any depending issues and collecting of final evidence.
30.05.2025	10.00 am – 12.00 pm	All	Oil Mill Office	<b>Audit Team Meeting/Findings review</b>
30.05.2025	01.00 pm – 02.30 pm	All	Oil Mill Office	<b>Preliminary RSPO P&amp;C Closing Meeting</b>
30.05.2025	02.30 pm – 04.00 pm	All	Oil Mill Office	<b>Closing meeting</b> Convene with all relevant staff to summarize audit findings, potential non-conformities, and next steps.
30.05.2025	05.00 pm	<b>End of day 5</b>		

Notes: Include the number of hours spent at the sample sites for each day of the audit, including the time for the opening and closing meeting

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

N/A
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#### 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>	18	Low Risk	$x = \sqrt{18} * (0.8)$	3.39 approx. 4
<i>Scheme Smallholder</i>	-	Choose an item	-	-
<i>Scheme Outgrower</i>	-	Choose an item	-	-
<i>Independent Outgrower</i>	-	Choose an item	-	-

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
	2025	20xx	20xx	20xx	20xx
Industrial Aceitera de la RAAS Oil Mill	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ingenio I	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ingenio II	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cacao Mendoza	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
La Ceiba	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
La Palma	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Palma Adulta	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ñary Lapas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
El Escobal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Las Delicias	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Malopi I	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Malopi II	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Limas San Jose	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
El Capricho	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
El Wary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
El Borbollón	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
El Granadillo	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
El Almendro	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
La Alianza	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



#### 4.7. Audit Team Leader and Audit Team Information

<b>Audit Team Leader: Weesmary Navarro - ASI12SAXDA</b>		
<b>Requirements</b>	<b>Description</b>	
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;	13 years of work experience. of which 11 years have been in the oil palm agribusiness. During this time. she has worked as head of environmental processes in mills and have assisted in the adoption of sustainable technologies with small. medium and large-scale producers. Also has worked as an auditor in national ISO and OSHAS certification standards. and as an implementer of international certification standards such as RSPO and ISCC. Skills in the implementation of environmental management systems. coordination and development of sustainable projects. internal and external audits. environmental and social impact assessments. among others.	
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;	To obtain certification as a P&C lead auditor. he completed three observations and participated in three audits as a team member before assuming the role of lead auditor. She also completed the training and observations required to serve as a team auditor in the Small Independent Producer standard. subsequently achieving the position of lead auditor in this area.	
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 2023. he completed and passed the Principles and Criteria Lead Auditor course offered by RSPO-accredited CheckMark Training. In the same year. he also took and passed the Small Independent Producer standard auditor exam. offered directly by the RSPO.	
<b>Audit Team Members:</b>		
<b>Requirements</b>	<b>CAB Auditor Number</b>	<b>Description</b>
Possess a bachelor's degree or tertiary education in related disciplines, such as agriculture, environmental science or social sciences, etc;	Audit team Leader: WN ASI12SAXDA	Environmental and sanitary engineer. specialist in quality management and MSc in Tropical Agroforestry.
	Audit Team Member 1: JT ASI1MLVPO	Agricultural engineer. graduate in agricultural business administration. specializing in environmental administration and management.
	Audit Team Member 2: JA ASI1WSS3LK	Agronomy Engineering, Master-Social Management.
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	BS-Business Administration Masters- Human Resource Management
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: JT ASI1MLVPO	Advisor in sustainable agriculture. trainer of internal auditors in certification schemes in oil palm cultivation. auditor in sustainable agriculture since 2002. trainer of lead auditor in RSPO since 2016. verifier in compliance with responsible policies in purchasing



		from oil companies. audits in RSPO from 2023.
	Audit Team Member 2: JA ASI1WSS3LK	Rainforest Alliance audits to groups and farms, Rainforest Alliance chain of custody audits, RSPO P&C audits, verification of implementation of sustainability policies of palm oil purchasing companies. Bonsucro audits. 13 years' experience in Palm Oil Industry.
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	20 years' experience in the Palm Oil Industry - 18 years' experience as general Manager of Palm Oil Plantations. 15 years plus experience in the implementation and auditing of Integrated Control Systems and Supply Chain Management
Successfully completed an RSPO endorsed P&C lead auditor course	Audit team Leader: WN ASI12SAXDA	RSPO P&C lead auditor course 2018 (March 2023)
	Audit Team Member 1: JT ASI1MLVVPO	RSPO Principles and Criteria Lead Auditor (2016). Updated 2021. and 2024
	Audit Team Member 2: JA ASI1WSS3LK	RSPO Lead Auditor Update P&C v.2018. June 25 to 28, 2024.
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	Lead Auditor Refresher in RSPO Principles and Criteria V2018. Checkmark Training. 2024
Successfully completed the 5-day lead auditor course for ISO 9001 or ISO 14001 or ISO 45001.	Audit team Leader: WN ASI12SAXDA	5-day lead auditor course for ISO 9001:2015. ISO 14001:2015 and ISO 45001:2018 lead auditor (2015. 2023).
	Audit Team Member 1: JT ASI1MLVVPO	ISO 9001(2023). ISO 450001(2023)
	Audit Team Member 2: JA ASI1WSS3LK	QMS ISO 9001_2015 Lead Auditor Training course. IRCA. 22/01/2022.
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	Lead Auditor of ISO 9001:2015 and ISO 14001:2015 (2015) ISO 19011:2018 Guidelines for the audit of management systems (2019)
Demonstrable understanding of the latest version of RSPO Certification Systems	Audit team Leader: WN ASI12SAXDA	CBs training - RSPO certification system 2023
	Audit Team Member 1: JT ASI1MLVVPO	RSPO Principles and Criteria Lead Auditor (2016). Updated 2021. and 2024
	Audit Team Member 2: JA ASI1WSS3LK	CBs training - RSPO certification system 2023.



	Audit Team Member 3: Laura Reyes ASI1YTSB5L	CB training - RSPO certification system
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: WN ASI12SAXDA	RSPO training - ISH standard (May 2023)
	Audit Team Member 1: JT ASI1MLVVPO	-
	Audit Team Member 2: JA ASI1WSS3LK	-
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	20 years' experience in the Palm Oil Industry - 18 years' experience as general Manager of Palm Oil Plantations, including responsibilities in the implementation and monitoring of HCV, environmental topics. Training in NPP procedure and FPIC
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: JT ASI1MLVVPO	Trained in 2 practical audits against the RSPO P&C (2022-2023)
	Audit Team Member 2: JA ASI1WSS3LK	CBs training - RSPO certification system 2023.
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	Extensive hands-on audit experience, including supervised audits against RSPO P&C systems.
Knowledgeable and experience of the local/regional laws	Audit team Leader: WN ASI12SAXDA	Strong understanding and experience of local and regional legal frameworks related to environmental management in Agribusiness.
	Audit Team Member 1: JT ASI1MLVVPO	Training in labour legislation by the Ministry of Labour and the Bar Association of Honduras. training in occupational risks by IHSS. environmental laws. experience auditing other sustainable agriculture schemes for 25 years.
	Audit Team Member 2: JA ASI1WSS3LK	Knowledge of local laws regarding social and labour issues.
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	20 years' experience in the Palm Oil Industry - 18 years' experience as general Manager of Palm Oil Plantations, including responsibilities in the definition, application and follow-up to national legislation



Knowledgeable in Best Agricultural Practices, and Integrated Pest Management, pesticide and fertiliser use;	Audit team Leader: WN ASI12SAXDA	Strong understanding and experience of local and regional legal frameworks related to environmental management in Agribusiness.
	Audit Team Member 1: JT ASI1MLVVPO	Training as an agricultural engineer
	Audit Team Member 2: JA ASI1WSS3LK	Agronomy Engineering, Knowledge of good agricultural practices in oil palm crops.
	Audit Team Member 2: Laura Reyes ASI1YTSB5L	20 years' experience in the Palm Oil Industry - 18 years' experience as general Manager of Palm Oil Plantations, including responsibilities in the definition, application and follow up to Agricultural Practices, Integrated Pest Management, pesticide and fertilizer use. Responsible for the relationship with the internal and external stakeholders.
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: WN ASI12SAXDA	Implicit experience in environmental management and agricultural practices in the palm oil industry.
	Audit Team Member 1: JT ASI1MLVVPO	Participated in audits on oil palm with other schemes (2018) and RSPO (2025) regarding occupational safety in the extraction plant and plantations.
	Audit Team Member 2: JA ASI1WSS3LK	-
	Audit Team Member 2: Laura Reyes ASI1YTSB5L	Experienced in Occupational Health and Safety (OHS) standards, ILO training.
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: WN ASI12SAXDA	SA8000 Basic Training 2025
	Audit Team Member 1: JT ASI1MLVVPO	Audited experience in worker welfare in other sustainable agriculture schemes. training in social leader auditing and diploma in corporate social responsibility SA 8000
	Audit Team Member 2: JA ASI1WSS3LK	SA8000 Basic Auditor course. Master- Social Management. Rainforest Alliance auditor for 12 years.
	Audit Team Member 2: Laura Reyes ASI1YTSB5L	SA 8000 (2021) and experience in social audits



Experience in handling of land rights, gender and indigenous peoples' issues;	Audit team Leader: WN ASI12SAXDA	Experience in ISO 14001 and HCV/HCS assessments.
	Audit Team Member 1: JT ASI1MLVVPO	Experience auditing workplace well-being in other sustainable agriculture schemes. training in auditing social leaders. and a diploma in corporate social responsibility SA 8000. working in social development with communities.
	Audit Team Member 2: JA ASI1WSS3LK	Knowledge of social issues related to gender equality, labor rights, rights of communities or indigenous peoples.
	Audit Team Member 3 Laura Reyes ASI1YTSB5L	SA 8000 (2021) and experience in social audits
Experience in environmental and ecological auditing or assessments, such as experience with High Conservation Value (HCV)/High Carbon Stock (HCS) assessments, organic agriculture or the ISO 14001 Environmental Management Systems standard;	Audit team Leader: WN ASI12SAXDA	ISO 14001 lead auditor with experience in internal audits 2014 - 2018
	Audit Team Member 1: JT ASI1MLVVPO	The row can be added as necessary
	Audit Team Member 2: JA ASI1WSS3LK	-
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	ISO 14001 lead auditor with experience in internal audits
Fluent in one of the main national languages	Audit team Leader: WN ASI12SAXDA	Fluent in Spanish and English
	Audit Team Member 1: JT ASI1MLVVPO	Fluent in Spanish.
	Audit Team Member 2: JA ASI1WSS3LK	Fluent in Spanish and basic proficiency in English.
	Audit Team Member 3: Laura Reyes ASI1YTSB5L	Fluent in English and Spanish
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: WN ASI12SAXDA	Completed RSPO SCC Lead Auditor Training (2018) and familiar with supply chain requirements of palm oil mills.
	Audit Team Member 1: JT ASI1MLVVPO	The row can be added as necessary
	Audit Team Member 2: JA ASI1WSS3LK	RSPO V2020 Lead Auditor in Supply Chain.



Audit Team Member 3: Laura Reyes ASI1YTSB5L	Lead Auditor Refresher in RSPO Supply Chain V2020. Checkmark Training. 2024 and familiar with supply chain requirements of palm oil mills.
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## 5. Audit Findings & Results

Criterion / Indicator	Audit Findings	Audit Findings (Public Summary)	Results
<b>Principle 1: Behave Ethically and Transparently</b>			
<b>Criterion 1.1:</b> 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) Management documents that are specified in the RSPO P&C are made publicly available and shall include (but are not necessarily limited to): <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans</li> </ul>		The company has implemented a documented procedure for handling petitions, complaints, claims, and information requests, ensuring stakeholders can access relevant sustainability and management information through multiple communication channels. Public documents related to environmental, social, and operational management are made available, while sensitive business and personal data are protected under confidentiality rules and disclosed only to competent authorities when required. The procedure establishes defined response timelines, and its effectiveness was verified during the audit through a test request and stakeholder consultation. Training activities have been conducted for workers and external stakeholders to ensure awareness of these mechanisms and the availability of	<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 8.1); <ul style="list-style-type: none"> <li>Public summary of certification assessment report; Human Rights Policy (Criterion 6.13).</li> </ul>		information.	
1.1.2	Information is provided in appropriate languages and made accessible to relevant stakeholders.		Information is provided in appropriate languages and made accessible to relevant stakeholders. This was confirmed because the stakeholder consultations were done in Spanish.	<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.		The company maintains records of information requests and corresponding responses; however, no such requests were received during 2024 and 2025.	<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)
1.1.4 (C)	Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.		The company has established formal procedures for handling petitions, complaints, claims, and requests, as well as a dedicated stakeholder engagement strategy. These procedures ensure that consultation and communication activities are documented, disclosed, and consistently implemented. Responsibility for managing communication with stakeholders lies	<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>with designated managers in social and sustainability areas, who act as the main points of contact.</p> <p>Key stakeholders include local communities, employees and unions, government authorities, international clients, and environmental and social organizations. The company maintains multiple channels for dialogue, such as meetings, consultations, and written communications, to address social and environmental issues. Training sessions have been conducted with different groups, including workers, contractors, producers, and community representatives, to strengthen awareness of the procedures and ensure effective participation.</p> <p>Records of community meetings and consultations confirm that stakeholders are aware of the processes and know how to engage with the company. Interview feedback highlights that opportunities for dialogue are regularly offered, reinforcing transparency and trust in the relationship between the company and its stakeholders.</p>	
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1.1.5	There is a current list of contact details of stakeholders and their nominated representatives.		The company maintains an updated stakeholder register covering various relevant groups related to its operations. This register was used during the audit to conduct consultations with selected representatives according to the audit plan, confirming the existence of a structured stakeholder engagement process.	<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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<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.		<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 company has established a Code of Ethics and Sustainability Policy that applies to employees, suppliers, contractors, and other stakeholders, promoting transparent and responsible business conduct aligned with no deforestation, no peat, and no exploitation principles. The organization operates under applicable legal requirements and corporate governance standards, fostering ethical decision-making, fair labor practices, and equal opportunities. It maintains communication channels for stakeholder engagement and conflict resolution, implements measures against corruption and illegal activities, and promotes sustainability throughout its supply chain. The company is committed to occupational health and safety, environmental protection, biodiversity conservation, and constructive relationships with local communities while ensuring responsible sourcing practices and respect in all professional interactions.</p>	



1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.		<p>The company has established mechanisms to monitor compliance with its Code of Conduct through stakeholder commitments, communication channels, and corrective action procedures. It promotes legal compliance, ethical business practices, safe working conditions, and prevention of corruption and illegal activities, while enabling stakeholders to report concerns confidentially through grievance channels. Reports are investigated and corrective measures are implemented when necessary. The organization also conducts training and awareness activities for workers, contractors, producers, and external stakeholders to reinforce ethical conduct, and contractual agreements include commitments to comply with the code of conduct.</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>The audit confirmed that the company has established systems for identifying and evaluating applicable legal requirements, including a legal matrix and monitoring mechanisms for environmental and occupational health and safety management. It was verified that environmental permits are valid and that processes are in place for monitoring corrective and improvement actions. However, a major non-conformity was detected related to compliance with specific legal requirements. The absence of the operating license required by the competent authority for internal security services with armed personnel was noted. In addition, deficiencies were identified in the supply of drinking water to workers in certain field areas, as well as a lack of evidence regarding the potability of water from artisanal sources used in operations.</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>The assessment showed that the company has a structured system for monitoring and updating applicable legal requirements, supported by external advisors and specialized platforms. Field controls were also found for raw material suppliers, verifying aspects of sustainability and safety. However, a non-conformity was</p>	<p> <input type="checkbox"/> Conform  <input type="checkbox"/> Major Nonconformity  <input checked="" type="checkbox"/> Minor Nonconformity  <input type="checkbox"/> Opportunity for Improvement         </p>

			<p>raised due to deficiencies in the ongoing due diligence process with outsourced service providers. Although procedures exist for the selection of contractors, a lack of effective mechanisms for the periodic supervision and evaluation of legal and safety compliance during the execution of contracts was detected. Specifically, gaps were observed in the control of vehicle documentation, driver's licenses, and compliance with social security obligations in transportation services. The organization needs to strengthen its monitoring protocols to ensure ongoing compliance by third-party contractors.</p>	<input type="checkbox"/> Not Applicable (justification required)
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>		<p>The boundaries of the property are marked and visible, and the company's operations are carried out only within those boundaries.</p> <p>During the tour of the sample properties visited during the audit, it was observed that the company has barbed wire fences and concrete bases marked with letters and numbers that define the boundaries with neighbouring properties. In reviewing the maps with the company's boundaries, it was identified that they match the boundaries observed during the field tour.</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)



<b>Criterion 2.2:</b> 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 certification unit has List of Contracted Parties, including 19 contractors (oil mill and field). The existence of a database that centralizes legal and administrative information on service providers was verified. In addition, a sample review was conducted of due diligence documentation for various critical services, such as personnel and product transportation, food services, machinery rental, veterinary services, and oil storage, in order to ensure compliance with internal procedures and current regulations.	<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.		During the exhaustive review of contractual agreements with various critical service providers, such as personnel and product transportation, food services, and raw material supply, it was confirmed that the current contracts include specific clauses requiring compliance with applicable legal, labor, and environmental regulations. In addition, the existence of essential supporting documentation, such as tax identification numbers, social security records, operating permits, and insurance policies, was verified, ensuring that business	<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)



			relationships are managed in accordance with established procedures and national legal requirements.	
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.		The organization has formalized commercial relationships with its fruit suppliers and transportation services through written contracts and updated addenda. It was evident that these legal documents incorporate specific clauses requiring compliance with current legal regulations, as well as robust provisions for the protection of human and labor rights. This includes explicit commitments against forced labor, labor trafficking, and child labor, ensuring that third parties are aligned with the company's sustainability and ethics policies.	<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)

<b>Criterion 2.3:</b> 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"> <li>● Information on geo-location of FFB origins</li> <li>● Proof of the ownership status or the right/claim to the land by the grower/ smallholder</li> <li>● Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB</li> </ul>		The management of the third-party supply base was verified. It was found that the company maintains a document called Independent Producer Statistics, which is reviewed and updated periodically when new producers join or technical visits are made. In addition, the existence of an Independent Producer Database Matrix was validated, which consolidates detailed information including: code, producer name, gender, location, address, farm name, total hectares, planting density (palms/ha), year of planting, and geographic coordinates.	<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. <b>PROCEDURAL NOTE:</b> For Implementation Procedure for 2.3.2 refer to Annex 4.		During the verification, the public deed of sale formalizing the transfer of a rural property to the company operating the collection center was examined. The document reviewed contains the identification and legal representation of the parties involved, the technical and precise description of the property, the total area of the land, as well as the express statement of acceptance of the acquisition by the buyer. It was also verified that the instrument establishes the corresponding obligations for registration	<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)



			in the Public Registry and has the required notarial formalities, including certification and closing of the act. The review confirmed that the property where the collection center operates has valid and duly formalized legal support, evidencing compliance in terms of property legality and legal security of the operation.	
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**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.		The certification unit has developed and implemented a formally approved long-term business plan that demonstrates the economic and financial viability of its operations. The plan includes agricultural production projections, third-party supply base management, and crop renewal programs. It also details strategic investments aimed at expanding industrial capacity and implementing renewable energy technologies. The organization continuously monitors operating costs, cash flows, and quality parameters, ensuring robust financial planning that is consolidated at the corporate level and	<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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			subject to periodic reviews.	
3.1.2	An annual replanting programme projected for a minimum of five years, is available.		<p>The company has a renovation plan for a period of five years, from 2025 to 2029. According to the plan for 2025, 292.90 hectares of palm trees will be renovated. No renovations are planned for 2026, 2027, 2028, and 2029, as the company's production areas are within their productive biological cycle.</p> <p>The company's renovation plan contains the planning of the activities that must be carried out to complete the renovation, such as the removal of plants and preparation of the land.</p> <p>During the tour of the production areas, we observed the company's palm tree nursery, which will be used for renovation.</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)

3.1.3	<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> <ul style="list-style-type: none"> <li>Results of internal audits</li> <li>Customer feedback</li> <li>Process performance and product conformity</li> <li>Status of preventive and corrective actions</li> <li>Follow-up actions from management reviews</li> <li>Changes that could affect the management system</li> <li>Recommendations for improvement</li> </ul>		<p>The certification unit conducts periodic reviews of its management system in accordance with the intervals defined in its internal procedures, with the last one reported on May 21, 2025. The annual review by management was verified, in which critical aspects such as process performance, stakeholder feedback, and the status of corrective actions were evaluated. Likewise, it was evident that the findings from internal audits have been effectively managed and closed, demonstrating the organization's commitment to continuous improvement and the allocation of resources for system maintenance.</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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**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>	<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"> <li>i. Optimising the yield of the supply base.</li> <li>ii. Reduction in use of pesticides (Criterion 7.2)</li> <li>iii. Environmental impacts (Criteria 3.4, 7.6 and 7.7)</li> <li>iv. Waste reduction (Criterion 7.3)</li> <li>v. Pollution and greenhouse gas (GHG) emissions (Criterion 7.10)</li> <li>vi. Impacts on communities, workers and smallholders (Principle 6)</li> <li>vii. Integrated management of HCV-HCS, peatland and other conservation areas (Criteria 7.7 and 7.12)</li> </ul>		<p>The certification unit has designed and implemented a comprehensive continuous improvement plan covering production, environmental, and social aspects for both its own operations and its supply base. Investments in the modernization of operational infrastructure and social welfare were verified, as well as the establishment of baselines for emissions and waste management. The company demonstrated a strong commitment to the development of its independent producers through technical assistance programs, training, and financing mechanisms for inputs and equipment, satisfactorily complying with the standard's continuous improvement requirements.</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>3.2.2</p>	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p>		<p>The certification unit has successfully completed and reported on the key performance indicators required by the RSPO. The accuracy and traceability of the data submitted for the period evaluated was verified, covering aspects of production, natural resource consumption, supply base management, and occupational health and safety statistics.</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 review of supporting records demonstrated the consistency of the information reported, ensuring compliance with the monitoring and measurement requirements of the standard.	
<b>Criterion 3.3:</b> 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.		The certification unit has established and documented a comprehensive set of Standard Operating Procedures (SOPs) covering the critical areas of environmental management, occupational health and safety (OHS), and good agricultural practices. The existence and updating of procedures for key activities in both the plantations and the extraction plant were verified, including water resource management, waste management, emergency response, and operational risk control. Field visits to the farms and industrial facilities confirmed that these procedures are implemented and followed by operational personnel, ensuring consistency and control in the execution of activities.	<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)



3.3.2	A mechanism to check consistent implementation of procedures is in place.		<p>The organization's internal oversight mechanisms were evaluated, confirming the existence of evaluation plans and records of environmental and operational inspections. However, a major non-compliance was identified related to inconsistency in the systematic application of standard operating procedures. Gaps were detected in the control of work permits for high-risk tasks (work at heights), as well as significant deviations in agricultural and industrial environmental management. Specifically, biomass disposal practices were observed that generated water pollution risks and the use of agricultural inputs after their expiration date, contravening established internal procedures. The organization must ensure that its operational practices are strictly aligned with its management system documentation.</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)
3.3.3	Records of monitoring and any actions taken are maintained and available.		<p>The certification unit maintains an active monitoring system to verify the implementation of its Standard Operating Procedures (SSOP). Records of periodic assessments in the agricultural, industrial, and environmental areas were reviewed, covering critical aspects such as water resource management, waste management, delimitation of protection</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>zones, and fertilization work. In the industrial safety component, monthly monitoring of emergency and personal protective equipment was evident, identifying opportunities for improvement in the maintenance of safety infrastructure. Environmental assessments at the extraction plant demonstrated a high level of compliance in waste management, well control, and spill response capacity, supported by the validation of indicators and regulatory compliance with the competent authorities.</p>	
<p><b>Criterion 3.4:</b> 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.</p>				
3.4.1 (C)	<p>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/Outgrowers scheme, is documented.</p>		<p>The company has completed a comprehensive Social and Environmental Impact Assessment (SEIA) prior to the commencement of new plantation development activities. The study clearly delineates the areas of direct and indirect influence of the project and integrates the results of a participatory consultation process with local communities and relevant stakeholders. The identification and documentation of potential environmental and social impacts were verified, ensuring that the project's</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>

			development considers community concerns and establishes the basis for its responsible management.	
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.		The certification unit conducted a Social and Environmental Impact Assessment and implemented updated environmental and social management and monitoring plans covering plantation and processing operations. The assessment included stakeholder consultation and periodic monitoring of mitigation measures. Evidence shows implementation of worker welfare, environmental protection, and community engagement activities, while improvement areas identified were addressed through updated plans, training, and stakeholder participation 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)
3.4.3 (C)	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		The Social and Environmental Management Plan derived from the 2022 ESIA was implemented, monitored, and updated in January 2024, supported by an Environmental Commitment Matrix defining mitigation measures for identified impacts.  Field verification in three sampled Management Units confirmed effective implementation, including protection of water bodies, proper waste management,	<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>and compliant wastewater treatment verified through laboratory analysis.</p> <p>Participatory monitoring and review processes were conducted in January and March 2024 with community leaders, government representatives, suppliers, and employees to ensure transparency and plan updates.</p> <p>Social management plans for 2024–2025 address worker welfare, potable water supply, occupational insurance, child labor prohibition, gender-based violence prevention, and freedom of association.</p> <p>The company promotes community engagement through periodic visits, local procurement prioritization, road dust control, transparent pricing discussions with FFB producers, and open-access internal roads.</p> <p>Workforce composition reflects strong local inclusion (87.91% local employees), and the management and monitoring system is regularly reviewed and updated through a participatory approach.</p>	
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**Criterion 3.5:**

A system for managing human resources is in place.



3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.		The company has documented procedures covering recruitment, employment conditions, training, promotion, termination, and retirement, ensuring compliance with labor regulations, human rights, and non-discrimination principles. Workers receive formal contracts, induction, and periodic training, and performance is monitored through structured evaluations and supervision. Internal work regulations and collective agreement establish communication mechanisms with worker representatives, supporting transparent labor relations and follow-up on working conditions.	<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)
3.5.2	Employment procedures are implemented and records are maintained.		The company implements documented employment procedures and maintains personnel records covering hiring, induction, employment conditions, and termination. File reviews and interviews confirmed consistent application of recruitment and labor administration processes, including legal registration, payments, and worker benefits. Adjustments to job assignments were made to protect worker health when required, and voluntary resignations were properly processed and settled.	<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)



3.6.1 (C)	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		The certification unit has implemented risk assessment processes and occupational safety plans in its agricultural operations, demonstrating the use of protective equipment and preventive measures in the field. However, a major non-compliance was identified in the extraction plant related to hazard identification. It was found that the current risk matrix does not reflect all the hazards present in the operational areas, and maintenance activities were observed in effluent treatment areas without adequate safety controls for working at height or near deep bodies of water, as well as deficiencies in the signage for electrical hazards and restricted access. The company must update its hazard identification and strengthen operational controls to ensure a safe working environment.	<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)
3.6.2 (C)	The effectiveness of the H&S plan to address health and safety risks to people is monitored		The monitoring systems of the occupational health and safety plan of the certification unit were evaluated, identifying a major non-conformity due to the lack of effectiveness in the follow-up of risks and action plans. In industrial facilities, low percentages of implementation of annual management	<input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



			<p>plans and a lack of documentary follow-up on previously detected unsafe conditions were observed. In agricultural operations, inconsistencies were found between documented risk assessments and personal protective equipment controls applied in the field for mechanized work. Likewise, the absence of risk management measures was identified for workers who travel long distances at night to crop areas. The organization must strengthen its monitoring mechanisms to ensure the coverage and effectiveness of its safety plans.</p>	<input type="checkbox"/> Not Applicable (justification required)
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**Criterion 3.7:**

All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.



<p>3.7.1 (C)</p>	<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&amp;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"> <li>- the health and environmental risks of pesticide exposure;</li> <li>- recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women);</li> <li>- International and national instruments or regulations that protect workers' health;</li> <li>- Productivity and best management practice;</li> <li>- relevant SOPs.</li> </ul>		<p>The company maintains a structured training procedure based on annual needs assessment, approved planning, and documented evaluations. Training records confirm participation and knowledge verification, with corrective actions for failed evaluations. Training programs include sustainability requirements and operational procedures, supported by documented plans and databases.</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>3.7.2</p>	<p>Records of training are maintained, where appropriate on an individual basis.</p>		<p>Training plans were implemented and documented for workers and stakeholders, covering sustainability, legal, and operational topics. Attendance and evaluations confirm participation and satisfactory performance, and specialized emergency training was provided. Records</p>	<p><input checked="" type="checkbox"/> Conform  <input type="checkbox"/> Major Nonconformity  <input type="checkbox"/> Minor Nonconformity  <input type="checkbox"/> Opportunity for Improvement</p>

			demonstrate systematic training management and traceability.	<input type="checkbox"/> Not Applicable (justification required)
3.7.3	<p>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>		<p>The certification unit has a structured annual training plan that covers the critical requirements of the RSPO standard. There was evidence of a comprehensive rollout of training sessions for all operational, administrative, and logistics staff, focusing specifically on the Supply Chain Certification Standard and the Identity Preserved (IP) model. Verified records show that employees have received training in traceability, document control, critical points in the process, and the use of IT platforms for reporting certified volumes, ensuring staff competence in handling RSPO material.</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)
<b>Criterion 3.8:</b> Supply Chain Requirements for Mills				
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&amp;C, or against a Group Certification Scheme</p> <p>Certification for the CPO mills is necessary</p>		<p>The plant certification model is based on a dual production system that guarantees the integrity of products certified under the Identity Preserved (IP) model through strict physical and electronic segregation at all stages of the process. Traceability begins with the mandatory recording of incoming goods in a computerized management</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



	<p>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>system, differentiating the origin of the raw material from the scale and channeling the flows through ramps, gates, and exclusive tanks, controlled by key selectors and light signals that mechanically block non-corresponding routes. Instead of wet washing, the company uses physical purging and sweeping protocols, automatically degrading controlled volumes of product to the conventional category to ensure the cleanliness of lines, hoppers, and clarification equipment before each certified batch. This scheme is complemented by electronic and physical documentation of each movement, ensuring that the final product retains its unaltered identity without risk of cross-contamination throughout the supply chain.</p>	<p><input type="checkbox"/> Not Applicable (justification required)</p>
3.8.2	<p>Mass balance Module 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 3<sup>rd</sup> party certified supply base.</p>		<p>Not applicable. The company only implements the preserved identity model.</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>



3.8.3	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.		The certification unit has calculated and documented production projections for the next license period. The existence of a statistical operating plan detailing estimated volumes of raw materials and finished products was verified, clearly differentiating between certified and conventional flows. Likewise, the application of consistent oil and kernel extraction rates for calculating the volumes of Certified Sustainable Palm Oil (CSPO) and Certified Sustainable Palm Kernel Oil (CSPKO) to be requested in the commercial license was validated.	<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)
3.8.4	The mill shall also meet all registration and reporting. Requirements for the appropriate supply chain through the RSPO IT platform		The certification unit operates under a valid and current RSPO membership, managed through its corporate structure. Active registration on the RSPO's official traceability platform was verified, ensuring the ability to report certified material transactions within the established deadlines. In addition, the appointment of competent personnel with formally defined responsibilities for supply chain management and control was verified, ensuring the integrity of the reported data.	<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	Documented Procedures The mill shall have written procedures		During the evaluation of the extraction plant's management system, it was verified	<input type="checkbox"/> Conform



<p>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> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all elements of the supply chain model requirements</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records)</li> <li>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.</li> <li>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.</li> </ul>		<p>that the organization has documented and updated procedures covering all stages of the production process, which are available and controlled in accordance with the provisions of its management manual. The use of a computer system for recording and operational control was confirmed, through which daily reports are generated to support the traceability of operations. Likewise, the identification and monitoring of critical control points throughout the chain, from reception to dispatch, was validated as part of quality assurance and supply chain management. In organizational terms, it was found that there are clearly defined responsibilities for the implementation and maintenance of the RSPO system, including the allocation of resources, the management of sustainable product inventories, the execution of internal audits, management reviews, and training programs. The production procedure under the dual process model establishes controls that guarantee physical and documentary segregation between certified and conventional raw materials from the moment they enter the facility, ensuring traceability through records in the weighing system, differentiated unloading areas, physical controls, and specific signage, as</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Major Nonconformity</li> <li><input type="checkbox"/> Minor Nonconformity</li> <li><input checked="" type="checkbox"/> Opportunity for Improvement</li> <li><input type="checkbox"/> Not Applicable (justification required)</li> </ul>
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			well as verification of cleanliness during batch changes to avoid any risk of mixing. An opportunity for improvement was identified related to a more precise definition of responsibilities and evidence in the event of non-compliance with cleaning conditions in delivery vehicles. (Reference OFI - 6).	
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 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</p>		<p>During the assessment of the internal control system, it was confirmed that the organization has a structured and documented framework for conducting internal audits, which establishes clear criteria for their planning, execution, monitoring, and closure, including defined deadlines for both addressing non-conformities and verifying their effectiveness. An annual audit program with scheduled cycles was identified, allowing for systematic coverage of the requirements of the RSPO P&amp;C 2018 standard and supply chain requirements. The internal audit plan and report executed in April 2025 were reviewed, documenting findings classified according to their level of severity; however, it was verified that, at the time of the external audit, all non-conformities had been addressed, closed, and submitted for verification of</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>



	audit records and reports.		effectiveness in accordance with the established procedure. Likewise, in the management review carried out in May 2025, the results of the internal audit were analyzed and the formal closure of the corrective actions was recorded. Additionally, it was confirmed that the scope of the internal audit included the evaluation of compliance with the current version of the RSPO Communication and Complaints Rules, demonstrating a comprehensive approach to the internal control system.	
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>		The certification unit has documented procedures for receiving materials and handling non-compliant products, designed to prevent unintentional mixing and ensure the integrity of the supply chain. However, a major non-compliance was identified related to errors in the documentary identification of raw materials. It was observed that conventional fruit was entered using records designated for certified fruit, and inconsistencies were detected between physical and digital production reports regarding the RSPO status of the product. Although the final oil is sold as conventional, these documentary	<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)



			discrepancies represent a risk to traceability and must be corrected to ensure the reliability of the mass balance or identity preserved system. (Reference NC - 7).	
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"> <li>a) The name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation</li> <li>i) A unique identification number</li> </ul>		<p>The audit confirmed that, although the certification unit has not sold any certified material because it is in the initial certification process, it has established the necessary mechanisms to comply with commercial communication requirements. The existence of operating procedures and billing templates incorporating all the information elements required by the standard, such as identification of the parties, product details, supply chain model, and certificate numbers, was verified. The organization demonstrated that it is prepared to manage document traceability and announcements on the official IT platform as soon as it begins marketing RSPO products.</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)
3.8.9	Outsourcing Activities		The audit assessed the management of	<input type="checkbox"/> Conform



<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 contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual</p>		<p>outsourced activities for the transportation and storage of palm products. The organization has defined procedures for selecting and contracting service providers and maintains a register of approved third parties. However, a non-conformity was identified related to the control of outsourced operations. It was found that standard operating procedures for handling certified products had not been shared with contractors. In addition, a review of contractual agreements for external storage revealed clauses that limit the supplier's liability for contamination or preservation of product identity, which represents a risk to the certification model. Furthermore, the lack of timely notification regarding external storage facilities prevented on-site verification of operating conditions during the audit. (Reference NC - 8).</p>	<p><input checked="" 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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	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.			
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.		The certification unit maintains a formal and detailed record of subcontracted suppliers for logistics and storage operations. The existence of updated lists containing the legal and administrative information of transport companies and oil storage service providers was verified, ensuring the clear identification of external actors integrated into the supply chain.	<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)
3.8.11	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.		The certification unit has established the necessary protocols to notify the certifying body of any inclusion of new third parties in the physical supply chain. It was verified that, during the period evaluated, the list of subcontractors remained stable and no new suppliers of processing or handling services for certified products requiring additional reporting were registered.	<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)
3.8.12	Record Keeping (i) The mill shall maintain accurate, complete, up-to-date and accessible		The certification unit has implemented robust procedures for maintaining and retaining critical supply chain information.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity



	<p>records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>(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.</p> <p>(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.</p> <p>(iv) For Mass Balance Module, the mill:</p> <p>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> <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</p>		<p>It was verified that the record retention periods comply with the traceability requirements of the standard, ensuring the availability of information for a minimum of two years. Likewise, the organization demonstrated that it maintains up-to-date controls on the estimated and declared volumes of certified oil, ensuring transparency and adequate monitoring of production balances during the license period.</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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	is allowed to sell short (i.e. product can be sold before it is in stock.)			
3.8.13	<p><b>Extraction rate</b></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>The certification unit has defined and documented clear methodologies for calculating and updating oil extraction rates (OER and kernel extraction rates (KER). It was verified that the management system includes daily review of production yields and the application of conversion rates based on actual monthly averages to ensure the accuracy of the certified volumes declared. Inventory procedures ensure differentiated and periodic tracking of certified and conventional products.</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 actual performance or industry average if appropriate.</p>		<p>The certification unit applies consistent methodologies for updating and monitoring its conversion rates. It was verified that the calculations are based on the actual performance of the plant, using monthly averages and daily reviews to ensure the accuracy of production data. Likewise, it was validated that the inventory system allows for clear separation and differentiated periodic closings for certified and conventional products, guaranteeing the reliability of the reported volumes.</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)



3.8.15	<p><b>Processing</b></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>The plant certification model is based on a dual production system that guarantees the integrity of products certified under the Identity Preserved (IP) model through strict physical and electronic segregation at all stages of the process. Traceability begins with the mandatory recording of incoming goods in a computerized management system, differentiating the origin of the raw material from the scale and channeling the flows through ramps, gates, and exclusive tanks, controlled by key selectors and light signals that mechanically block non-corresponding routes. Instead of wet washing, the company uses physical purging and sweeping protocols, automatically degrading controlled volumes of product to the conventional category to ensure the cleanliness of lines, hoppers, and clarification equipment before each certified batch. This scheme is complemented by electronic and physical documentation of each movement, ensuring that the final product retains its unaltered identity without risk of cross-contamination throughout the 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>
3.8.16	Registration of Transactions		The certification unit understands and applies the traceability management	<input checked="" type="checkbox"/> Conform

	<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>requirements on the RSPO Prisma platform. It was confirmed that the organization assumes legal and physical ownership of the product and has established clear procedures for the timely recording of commercial transactions once it is certified. Likewise, mechanisms for the correct removal of volumes from the system in situations of conventional sales or losses were validated, ensuring consistency between physical inventory and digital records.</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><b>Claims</b></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>The certification unit complies with the guidelines established in the RSPO Rules on Communications and Claims. It was verified that the organization uses the trademark and makes public statements exclusively in the context of its membership and general support for sustainability, without making unauthorized product claims. The use of logos and license codes in digital channels and internal materials is aligned with the requirements of the standard.</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 / Indicator	Audit Findings	Audit Findings (Public Summary)	Results
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**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)	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.		The company implements a Code of Conduct and Sustainability Policy covering human rights, labor conditions, non-discrimination, and environmental commitments, applicable to employees and supply chain partners. Training records and contractual agreements confirm awareness and formal commitment to the policy, and the organization maintains mechanisms to verify compliance and address non-compliance when necessary.	<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)
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.		The organization maintains a human rights policy within its sustainability framework and no evidence of involvement with mercenary or paramilitary groups was identified through document review or stakeholder consultation.	<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 4.2: 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)	<p>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>		<p>The company has a Petitions, Complaints, Claims, Acknowledgements and Suggestions Procedure, that establishes clear communication between stakeholders and the organization. The procedure covers the full cycle: reception of requests, assignment of responsibility, follow-up, and closure, ensuring timely responses. Multiple channels are available for submitting Petitions, Complaints, Claims, Acknowledgements and Suggestions, including in-person communication, forms, phone, email, and the company's website. To guarantee confidentiality, submissions can also be made anonymously.</p> <p>Responsibility for managing the system lies primarily with the Social Manager, supported by Human Resources, department heads, and a resolution committee when cases require deeper analysis. Specific types of issues—such as workplace concerns, client matters, or regulatory complaints—are directed to the appropriate department.</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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			<p>The process emphasizes respect for human rights, including protection against retaliation or intimidation.</p> <p>Stakeholders are regularly trained to understand and use the PQRS mechanism, with special measures in place to ensure accessibility for illiterate participants. These include verbal communication, visual materials, and assisted participation. Records show that training sessions have been conducted with workers, contractors, producers, community representatives, and government entities. Community meetings and consultations confirm that stakeholders are aware of the procedure and know how to engage with it.</p> <p>Overall, the Petitions, Complaints, Claims, Acknowledgements and Suggestions system is designed to be inclusive, transparent, and responsive, reinforcing trust between the company and its stakeholders while providing structured avenues for dialogue and conflict resolution.</p>	
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4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		<p>The company maintains an inclusive grievance mechanism accessible to all stakeholders, including illiterate individuals, supported by tailored training, visual materials, and direct communication channels. Training records and stakeholder consultations confirm awareness and understanding of the system.</p> <p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</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)
4.2.3	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.		The company operates a documented grievance mechanism with defined channels, responsibilities, timelines, tracking, and escalation procedures. Records demonstrate implementation, stakeholder communication, corrective actions, and closure confirmation, including community complaints and producer requests monitored through a traceable database.	<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.		The organization operates a confidential and structured grievance mechanism with defined responsibilities, communication channels, response timelines, mediation options, and appeal processes, ensuring stakeholders can seek resolution internally or externally when necessary.	<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)
<b>Criterion 4.3:</b> 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.		Community engagement activities address health, education, safety, infrastructure, and environmental support needs identified through stakeholder consultation, demonstrating implementation of community development contributions.	<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)



<b>Criterion 4.4:</b> 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)	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.		Land tenure documentation is available, including owned properties.  The company owns 198 property titles, evidenced by public deeds granted by notaries and registered in the Property Registry. which are grouped into 18 supply bases.	<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)
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include.  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.		The company applies an FPIC procedure to recognize and respect customary rights through consultation, contextual assessment, and agreements with communities. No disputes were identified and stakeholder consultations confirmed that agreements are respected and implemented.	<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)	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through		The company holds legal title to its land, and maps of each property have been prepared to show boundaries and areas	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity



	<p>participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>		<p>of influence. These maps are used in environmental and social impact assessments and include the geographic location of neighboring communities. Boundaries are clearly marked with roads, markers, and buffer strips, ensuring that planting does not extend beyond legal limits.</p> <p>Stakeholder consultations confirm that legal and user rights are recognized through participatory mapping with affected communities. Documentation reviewed shows that agreements, records, and impact assessments are available in Spanish, making them accessible to stakeholders. Workers and community members have participated in mapping exercises and benefit-sharing discussions, reinforcing transparency and inclusion.</p> <p>Overall, the company demonstrates that its land tenure is secure, boundaries are well defined, and consultation processes are implemented in a way that respects legal rights and community participation. This approach helps maintain trust and ensures compliance with environmental and social standards.</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>
4.4.4	All relevant information is available in		Documentation and consultations are	<input checked="" type="checkbox"/> Conform



	appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements..		accessible in the local language, and stakeholder verification confirms implementation of agreed arrangements.	<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.		The company maintains legal ownership of its land and has prepared maps, agreements, records, and impact assessments that are accessible to stakeholders. These documents, along with benefit-sharing proposals, are presented in Spanish to ensure understanding by affected communities. Boundaries are clearly defined through roads, markers, and buffer strips, and participatory mapping exercises have been conducted with neighboring communities to recognize legal and user rights.	<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.		The company implemented an FPIC process involving full community participation, consultation, and documented agreements recognizing customary rights and addressing concerns. Stakeholder consultations confirmed acceptance of the project and fulfillment of agreed commitments.	<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)
<b>Criterion 4.5:</b> 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 company applies an FPIC procedure to recognize and respect customary rights, and stakeholder consultations confirm that agreements are implemented and maintained.	<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 to independent advice through a documented, long-term and two-way process of consultation and negotiation.		The company implemented an FPIC process with full community participation, consultation, and documented agreements recognizing customary rights and addressing concerns. Stakeholder consultations confirmed acceptance of the project and fulfillment of commitments.	<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)
4.5.3	Evidence is available that affected local		The company has no new plantations and	<input checked="" type="checkbox"/> Conform



	<p>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 the land.</p>		<p>holds legally established land use rights, so no current FPIC negotiations are ongoing. Stakeholder consultations confirmed this situation. Nevertheless, a New Planting Procedure (NPP) is in place requiring FPIC and environmental and social impact assessments before any future land development activities.</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>
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning</p>		<p>There are no new plantations and land use rights are legally established, therefore no active FPIC negotiations are</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p>



	with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.		required. A participatory approach is used in community engagement, and stakeholders confirmed the information provided. The company does not negatively affect local livelihoods and instead supports community wellbeing through nutrition initiatives, family gardens, and training and development programs.	<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.		Agroindustrial Aceitera de la RAAS has no new plantations and land use rights are legally established, so no ongoing FPIC negotiations are required. Community engagement follows a participatory approach involving local stakeholders. The company does not adversely affect local livelihoods and supports community wellbeing through nutrition campaigns, family gardens, and training and development programs.	<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.		New lands have not been acquired for plantations and mills after 15 November 2018 as a result of recent expropriations (2005 or later). Stakeholders confirmed this during consultation process.	<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.		<p>No new planting.</p> <p>New lands have not been acquired in inhabited areas by communities in voluntary isolation. Stakeholders confirmed this during consultation process.</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)
4.5.8 (C)	New lands are not acquired in areas inhabited by communities in voluntary isolation.		<p>No new planting.</p> <p>New lands have not been acquired in inhabited areas by communities in voluntary isolation. Stakeholders confirmed this during consultation process.</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)
<b>Criterion 4.6:</b> 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.		<p>The company has a Conflict Management Procedure that establishes preventive and corrective measures to address disputes related to land, boundaries, invasions, labor, social, environmental, and customary rights.</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity



			<p>Before any new project, ESIA and HCVA studies are conducted to identify rights and determine possible compensation according to national law. The company prioritizes verification through technical and legal review, alternative dispute resolution, and, if necessary, judicial processes. The procedure includes remedies such as restitution, compensation, rehabilitation, satisfaction, and guarantees of non-repetition, and explicitly prohibits the use of force or intimidation. All negotiations involving affected parties are documented and allow participation of community representatives.</p>	<input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
4.6.2 (C)	<p>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.</p>		<p>The company has a Conflict Management Procedure applicable to the prevention and resolution of disputes, including compensation for potential loss of legal or customary rights of stakeholders. No land use authorization through an FPIC process has been required, and there are currently no active negotiation or compensation cases underway.</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)
4.6.3	<p>Evidence is available that equal opportunities are provided to both men</p>		<p>The company has established an FPIC procedure to guide collective</p>	<input checked="" type="checkbox"/> Conform



	<p>and women to hold land titles for small holdings.</p>		<p>consultation processes with communities. Its objectives include ensuring transparent dialogue, equitable participation, respect for cultural contexts, and recognition of customary rights. The procedure emphasizes good faith negotiations and free community decision-making, while maintaining respectful communication with stakeholders in the area of influence.</p> <p>To understand the local context, the company considers factors such as past or current conflicts, gender relations, perceptions of conservation and land use, and community financial conditions. Customary rights are identified and verified through internal reviews and participatory mapping with affected communities. Where rights are recognized, they are respected, and agreements are documented when necessary.</p> <p>The company does not have the authority to offer title deeds to men and women who own small farms; land purchase negotiations have been with private owners. The Nicaraguan government has the power to allocate land.</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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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.		<p>The company has a Conflict Management Procedure (code UN-LG-PO-02, version 1, dated 11/04/2025) applicable to general conflict prevention and resolution, including compensation mechanisms for potential loss of legal or customary rights of local or traditional communities in the areas where it operates.</p> <p>Authorization of land use through a Free, Prior and Informed Consent (FPIC) process has not been 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)
<b>Criterion 4.7:</b> 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.		<p>The company has a formal conflict management procedure that establishes investigation, verification, and resolution mechanisms for land ownership disputes, boundary issues, invasions, and social or environmental conflicts. It prioritizes dialogue and alternative dispute resolution, with legal action only as a last resort. The procedure also defines compensation measures aligned with international human rights standards and requires documentation and participation</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>of affected communities in any agreement.</p> <p>Compensation is not applicable for the 18 supply bases. In all cases, the sale was completed, the deed was drawn up, and the property was registered.</p>	
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.		<p>The company has a conflict management procedure (UN-LG-PO-02, v1, 11/04/2025) that establishes a structured process for preventing and resolving disputes, including those related to loss of legal or customary rights. The process involves receiving the complaint, review by the negotiation committee, possible technical assessment and investigation, meetings with affected parties, and a final resolution that may include restoration, remediation, or compensation, documented through a formal settlement record.</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)
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.		<p>Not applicable. No plantation expansion has taken place, and stakeholder consultations confirmed that Industrial Aceitera de la RAAS has not infringed the customary rights of local communities.</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)
<b>Criterion 4.8:</b>				
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.		Stakeholders confirmed no land disputes; therefore, FPIC and compensation have not been required, although a formal procedure exists to handle and resolve any potential third-party damage claims.	<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)
4.8.2 (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.		There is no ongoing compensation process; however, the company has a Conflict Management Procedure that defines how claims are received, investigated, and resolved through repair, restoration, or compensation, with a formal settlement record.	<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)
4.8.3	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		There are no new plantations, and stakeholders confirmed no land acquisition disputes; therefore, FPIC has not been required. No compensation cases are currently	<input checked="" 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).		ongoing, although procedures are in place should any arise.	<input type="checkbox"/> Opportunity for Improvement <input 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).		Stakeholders confirmed there are no disputes regarding land acquisition and no new plantations; therefore, FPIC has not been required. Land was acquired through third parties under agrarian reform. The company maintains a procedure to address potential damages to third parties, including claim reception, committee review, investigation, meeting with the affected party, determination of corrective action (repair, restoration or compensation), and issuance of a formal resolution and settlement record.	<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 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.		The certification unit promotes financial transparency with its fruit suppliers. It was verified that information on current prices and historical market behavior is public and accessible, distributed both on information boards within the facilities and through digital platforms. This ensures that producers are properly informed about the value of their product on a regular and transparent basis. During consultations with interested parties, producers confirmed that the price-setting mechanism is clear and updated regularly.	<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)
5.1.2 (C)	Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.		The certification unit maintains an active training program for its suppliers, focused on clarifying financial and commercial mechanisms. Regular workshops on pricing and payment methods were verified, achieving high participation among producers. In addition, the company demonstrated a commitment to inclusion and transparency by implementing personalized sessions during technical field visits for those suppliers who are unable to attend group events, thus ensuring that the entire supply base	<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)



			understands the commercial conditions.	
5.1.3 (C)	Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.		The certification unit establishes its commercial conditions through open and documented dialogue with independent producers. An active negotiation process was verified, in which critical aspects such as adjustments to payment rates per ton and by-products, financing conditions, and improvements to the logistics infrastructure for reception were discussed and agreed upon. The final agreements, the result of multiple working groups, were duly recorded and signed by the parties, demonstrating the company's commitment to fair and consensual commercial practices.	<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)
5.1.4 (C)	Evidence is available that all parties, including women and independent representative organizations 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		The certification unit keeps detailed records on the gender composition of its supply base, ensuring the visibility of female participation both in the general register and in producer representation committees. It was also verified that the company implements effective mechanisms to support farmers, managing requests for financing for	<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)



	other support mechanisms where applicable.		critical inputs and infrastructure improvements, which contributes to the strengthening and sustainability of the independent supply chain.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.		The audit confirmed that the commercial relationship between the company and its independent suppliers is duly formalized through written fruit purchase agreements. A representative sample of current agreements was verified, which transparently establishes the terms of quality, delivery logistics, and biweekly payment frequency based on weighing at the plant. The review showed the existence of long-term commercial relationships, backed by contracts with extended terms (up to 17 years) and automatic renewal clauses that guarantee supply stability and legal certainty for producers.	<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)
5.1.6 (C)	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		The certification unit applies clear and transparent payment policies for its new suppliers. The implementation of a fixed biweekly payment schedule and the use of bank transfers as the standard payment method were verified. It was also found that the company provides detailed information to producers on the	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



			calculation of their income, providing settlement receipts that clearly specify the volume of fruit delivered, as well as any applicable bonuses or deductions, ensuring financial traceability and compliance with commercial agreements.	<input 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).		The certification unit has adequate weighing infrastructure at its two fruit reception points (Oil Mill and La Fonseca). It was verified that the scales used to weigh raw materials from independent producers have valid and certified calibrations, ensuring accuracy and transparency in weight recording for payment to suppliers.	<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)
5.1.8	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.		The certification unit monitors its suppliers' good practices. However, it was verified that there is currently no project underway for the certification of small producers, as the independent supply base has not expressed any intention to adhere to the standard at this stage.	<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)



5.1.9 (C)	The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.		The certification unit has an active and documented system for handling complaints and claims. The mechanism was verified to be functional, processing a significant volume of internal and external requests over the last two years. Specifically, there were no formal complaints from small independent producers during the period evaluated, indicating stability in supply chain relationships.	<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)
<b>Criterion 5.2:</b> 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.		The certification unit takes a holistic approach to strengthening its independent suppliers. It was verified that the company not only provides technical training and access to financing for inputs, but also actively invests in community and productive infrastructure. Through a request response system, the company supports the maintenance of the road network, drainage systems, and access to farms, actions that have been fundamental in optimizing harvest logistics, reducing operating costs, and improving the livelihoods of small farmers.	<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)



5.2.2	<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>		<p>The certification unit implements a robust support plan for its independent producers. Tangible improvements were verified in logistics infrastructure and pricing conditions for fruit and by-products. Likewise, a strong commitment to the modernization of the field was observed through a program of continuous training and technical assistance in pest control. The company also demonstrated significant financial support, facilitating access to credit, fertilizers, and inputs to improve the productivity and sustainability of supplier farms.</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)
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>		<p>During the review of land tenure rights for the supply base, it was verified that all independent producers have the legal documentation supporting ownership of their land. Given the above, it is considered not applicable currently, as there are no legal gaps in tenure that require the company's intervention or assistance.</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)



5.2.4 (C)	Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.		The certification unit maintains an active and rigorous training program for its independent producers on chemical safety. It was verified that farmers receive technical training on pesticide handling, the correct use of protective equipment, and the management of hazardous waste (empty containers). The evaluations carried out demonstrated that producers understand the risks to health and the environment, as well as the practices prohibited by the standard, ensuring safer and more sustainable operations on supplier farms.	<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)
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.		The certification unit monitors its suppliers' good practices. However, it was verified that there is currently no project underway for the certification of small producers, as the independent supply base has not expressed any intention to adhere to the standard at this stage.	<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 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.		The company implements and communicates a comprehensive ethics and sustainability policy aligned with and anti-discrimination principles, applicable to all personnel and stakeholders, supported by training records and worker awareness evidence.	<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)
Pls 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		The company applies a non-discrimination policy covering local, temporary, contracted, and migrant workers, supported by a formal recruitment procedure that includes legal hiring processes for migrant personnel. Evidence and worker interviews confirmed equal treatment and absence of recruitment fees or discriminatory practices.	<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		The company has formal procedures governing recruitment, hiring, training, promotion, termination, and retirement, ensuring decisions are based on competence and legal requirements while prohibiting discrimination, child labor, and harassment. The system includes performance evaluations, documented promotions, legal hiring of migrant workers, annual training plans,	<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)



			and worker representation through a collective agreement. Evidence confirms implementation, including staff promotions and participation in training programs.	
6.1.4	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		The company prohibits pregnancy and HIV testing in hiring processes and restricts hazardous work for pregnant or breastfeeding workers, and interviews confirmed implementation.	<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)
6.1.5 (C)	A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.		The company has a formally established Gender Committee supported by management that promotes gender equality, protects pregnant and breastfeeding workers, conducts training and consultations, and implements programs and incentives focused on women's wellbeing and participation.	<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)
6.1.6	There is evidence of equal pay for the same work scope		Salary conditions were consistent for equal positions, payments are properly documented, and workers may earn above the minimum wage through	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity



			productivity incentives. The company pays wages above the legal minimum plus a union increase and provides transport allowances. No discrimination or recruitment fee payments were found.	<input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
<b>Criterion 6.2:</b>				
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)				
6.2.1 (C)	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.		Workers are directly hired under written contracts and understand their employment conditions, which are available in Spanish along with applicable labor laws and the collective agreement. Payroll records confirm equal pay for equal work, with variations only due to performance, and wages meet or exceed the legal minimum. The company maintains an active union agreement covering salary adjustments, benefits, working hours, and other conditions.	<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)
6.2.2 (C)	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		Employment contracts are properly documented in Spanish and registered with the Ministry of Labor, and payroll deductions and benefits reviewed for sampled workers were correctly applied. However, a non-conformity was	<input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



	<p>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>identified: in one voluntary resignation settlement, although the final payment was correctly calculated and paid, the document did not accurately show the wages received during the last six months (basis for benefit calculation), likely due to a new software implementation not previously detected.</p>	<p><input type="checkbox"/> Not Applicable (justification required)</p>
<p>6.2.3 (C)</p>	<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>Several non-conformities were identified in the application of labor regulations. Agricultural workers perform activities before the official start of the working day (talks, training sessions, early transport to the field, and fertilizer loading) without registration or remuneration, even though they are under the employer's control. A case was also found of a worker with extended working hours without an effective weekly rest and with attendance records inconsistent with the agreed shift. Additionally, in the settlement of a voluntary resignation, seniority compensation was not paid and no internal legal basis supporting this decision was evidenced. These situations violate labor code provisions related to working hours, weekly rest, and labor payments.</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>



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		Worker housing meets adequate living conditions and basic service requirements, including sanitation, water supply, and welfare facilities, and water quality is monitored according to legal requirements.	<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 provides a licensed food service at the oil mill offering balanced meals, while field workers either eat at home or in company camps, and workers receive training and guidance on healthy lifestyles and nutrition.	<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 those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  PROCEDURAL NOTE: The RSPO Labour		The company evaluated its wage structure using the national minimum wage as a reference and pays approximately 15% above the legal minimum, while also providing in-kind benefits such as transportation, meal support, and medical assistance; salary	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



	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		ranges vary by sector, with agricultural workers earning lower ranges and oil mill workers higher ranges.	<input type="checkbox"/> Not Applicable (justification required)
6.2.7	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		The company uses a mix of employment arrangements: indefinite-term rural contracts for regular workers, temporary contracts for seasonal activities (such as fertilizing, pruning, and planting), apprenticeship contracts in accordance with labor law, and labor contractors to cover peak production periods or specific tasks.	<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)
<b>Criterion 6.3:</b> 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		The company respects freedom of association and collective bargaining through its Code of Ethics and a valid collective agreement. Workers are informed during induction, union deductions appear on payslips, and	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



	implemented		<p>conciliator representatives are protected by law. Employees confirmed they can join the union at any time without interference, and non-union workers receive the same benefits.</p>	<input type="checkbox"/> Not Applicable (justification required)
6.3.2	<p>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>		<p>The company maintains a registered collective agreement with the union that guarantees freedom of association, union participation, job stability, and various labor benefits. The agreement establishes wages at least 15% above the legal minimum and includes protections for women and maternity, occupational health and safety measures, allowances, incentives, and social benefits. Workers confirmed access to union representatives and information, and official communications with the union are documented.</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)
6.3.3	<p>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>		<p>The company's Code of Ethics recognizes freedom of association, and interviews confirmed workers can join the union at any time without interference; non-union workers receive equivalent benefits under the collective agreement.</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)



<b>Criterion 6.4:</b>				
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		The company prohibits child and forced labor through its Code of Ethics and recruitment procedure. Workers and contractors have been trained on these requirements and contractors have signed compliance commitments in their contracts.	<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)
6.4.2 (C)	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		The company prohibits child and forced labour through its Code of Ethics and recruitment procedure and provides related training to workers. A sample of contracts and worker files confirmed that all employees meet the minimum age requirement and that identification controls are applied at hiring, with no evidence of child labour.	<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)	Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.		Nicaraguan labor law allows employment from 14 years of age under specific conditions; however, the company's Code of Ethics and recruitment procedure strictly prohibit hiring minors and any form of child or	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



			forced labor. Review of worker files and interviews confirmed that all employees are above both the national minimum age and the higher age required by company policy.	<input type="checkbox"/> Not Applicable (justification required)
6.4.4	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		The company prohibits child and forced labor through its Code of Ethics and recruitment procedure, which establishes a minimum hiring age of 18 years. Training has been provided to workers on this requirement, and the review of contracts, worker files, and interviews confirmed that all employees meet the minimum age and no evidence of child labor was found.	<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)
<b>Criterion 6.5:</b>				
Policies and procedures in place to protect workers' rights.				
6.5.1 (C)	A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce		The company has policies and procedures to prevent discrimination, human trafficking, and workplace or sexual harassment, including a Code of Ethics, recruitment procedure, and PQRS mechanism handled by Human Capital according to national labor regulations. Training has been provided for workers on these topics.  The company's worker files and	<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)



			consultations confirm that employees are fully aware of the policy designed to prevent sexual harassment and all other forms of violence. Workers reported that they understand the policy and its purpose, and importantly, no cases of non-compliance or related complaints have been identified	
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		The company implements a policy protecting reproductive rights, particularly for women, including restrictions on hazardous work during pregnancy or breastfeeding, worker participation in occupational health and safety, and mandatory PPE use, supported by employee training 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)
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		The company supports pregnant and breastfeeding workers through a Gender Committee, specific protection procedures, training, needs assessments, and welfare activities. Measures include paid maternal leave support, reassignment to safer duties, health programs, and dedicated facilities, demonstrating structured protection of maternal wellbeing.	<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>Non-conformity: Some worker complaints under the PQRS mechanism were not managed according to the procedure. Several anonymous complaints remained open for long periods and, although monthly updates were posted, no investigations were evidenced between the first and second complaints; the process only started after a later complaint provided more details, and all cases were eventually closed due to lack of evidence.</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)
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<b>Criterion 6.6:</b> 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"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>		The company's policy establishes voluntary employment and strictly prohibits child and forced labor, guaranteeing equal respect for the rights of all workers, including temporary and migrant employees.  <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		The company applies non-discriminatory recruitment procedures aligned with human rights, prohibits forced and child labor, provides contracts and policies to workers, and manages formal hiring processes for migrant employees; most of the workforce is local, supported by internal labor regulations.  <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)



<b>Criterion 6.7:</b> Appropriate health and safety measures are in place.			
6.7.1 (C)	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		The certification unit complies with legal and regulatory requirements for occupational health and safety governance. The constitution, registration, and validity of the Joint Health and Safety Committees (CMHST) were verified for both the extraction plant and the agricultural districts, duly endorsed by the Ministry of Labor. Evidence showed that these committees operate on a regular basis, with equal representation of workers and employers, actively addressing risk identification, infrastructure improvement, and ensuring safe working conditions.
			<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)
6.7.2	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.		The certification unit has a robust system for managing accidents and emergencies in all its operational areas. It was verified that there are up-to-date procedures in place that are known to workers for reporting and responding to workplace incidents. On the plantations, it was confirmed that there are personnel trained in first aid and that first aid kits are available. At the industrial plant, the existence of an
			<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)



			emergency plan certified by the fire department was validated, with specialized brigades (fire, evacuation, and health) and periodic drills to ensure preparedness for any eventuality.	
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>The certification unit guarantees the protection of its workforce through a robust Personal Protective Equipment (PPE) management system. It was verified that the company provides the appropriate equipment free of charge to all workers, both on-site and in the field, based on technical risk matrices. On-site inspections confirmed the correct use of equipment during operational tasks. Likewise, the existence of an effective procedure for the immediate replacement of damaged or worn equipment was validated, backed by rigorous document control that ensures the traceability of deliveries and compliance with current legal regulations.</p> <p>During the tour of the facilities and warehouses, a shower area with safety zones was observed for workers who apply agrochemicals</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		The certification unit strictly complies	<input checked="" type="checkbox"/> Conform



	<p>and covered by accident insurance. Costs 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</p>		<p>with its social security and occupational health protection obligations. A review of monthly social security payments and reports confirmed that the entire workforce is duly registered and contributing in accordance with the law. Additionally, it was confirmed that the company guarantees the health monitoring of its workers through medical examinations (pre-employment and periodic) performed by certified clinics with valid health licenses, ensuring that personnel are fit to perform their duties safely.</p>	<p> <input type="checkbox"/> Major Nonconformity  <input type="checkbox"/> Minor Nonconformity  <input type="checkbox"/> Opportunity for Improvement  <input type="checkbox"/> Not Applicable (justification required)         </p>
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics</p>		<p>The certification unit maintains rigorous and quantitative monitoring of its safety performance. An analysis of accident statistics from the last three years was verified, showing a positive trend in the reduction of the frequency and severity of workplace accidents in agricultural operations between 2023 and 2024. It was also found that the company uses official medical reports (INSS) to accurately calculate lost time and uses this information to focus its prevention plans on the months and areas of greatest risk.</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>



**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>The company has an Integrated Pest and Disease Management Manual. The manual contains descriptions, preventive measures, and control measures for pests and diseases that affect the company's oil palm crop.</p> <p>The objective is to prevent the spread of pests and diseases in the oil palm crop, keeping their incidence at an adequate level to ensure the crop's profitability, while making rational use of pesticides.</p> <p>The preventive measures taken by the company include frequent monitoring of different pests and diseases in order to keep economic damage within acceptable levels. Control measures include the application of biological products, cultural practices such as setting traps, and, as a last resort, the use of agrochemicals.</p> <p>The company also has:</p> <ul style="list-style-type: none"> <li>- Procedure for monitoring and controlling Cassina Felder opsiphanes.</li> </ul>	<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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			<ul style="list-style-type: none"> <li>- Procedure for monitoring and controlling <i>Strategus Aloeus</i> in oil palm.</li> <li>- Procedure for monitoring and controlling <i>Rhynchophorus Palmarum</i>.</li> </ul> <p>The records of the implementation of the activities contained in the Integrated Pest and Disease Management Manual were reviewed.</p>	
7.1.2	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>The company has introduced the invasive species kudzu and mucuna with the aim of improving soil fertility, retaining moisture, and controlling weeds. The company carries out activities to manage invasive species within its operations on palm plots less than 5 years old. However, a non-compliance was identified in the management of ground cover species (kudzu and mucuna). Although these species are used to improve soil fertility, it was found that containment protocols are insufficient, as monitoring is limited to young plantations only.</p> <p>As a result, it became evident that these species have spread beyond the boundaries of the crop, invading sensitive ecosystems such as riparian</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>protection zones and steep slope areas. The certification unit should expand its controls to prevent agronomic cover crops from affecting adjacent conservation areas.</p>	
7.1.3	<p>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]</p>		<p>The company has a policy of no deforestation, no peat, and no exploitation. It prohibits burning: Fire cannot be used in the preparation of new plantations, replanting, or any other development. Fire is also not permitted for open-air waste disposal or direct dumping into waterways. Likewise, open-air burning for pest and disease control is prohibited, except in exceptional circumstances.</p> <p>This is also stated in the Integrated Pest and Disease Management Manual, states that Fire shall not be used for pest control, except in exceptional circumstances, i.e., when no other effective methods are available, and with the prior approval of the Ministry of Agriculture (MAG) and the Institute for Agricultural Protection and Health (IPSA).</p> <p>During the tour of the different production areas of the farm and in interviews with workers, it was</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>

			confirmed that the company does not use fire for pest and disease control.	
<b>Criterion 7.2:</b>				
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.		<p>The company has a document called justification for the selection of pesticides for weed and pest control.</p> <p>For each of the selected agrochemicals, the following factors have been taken into account: control efficacy, longer control duration, lower risk of leaching, low chemical load, and lower environmental impact.</p> <p>The agrochemicals used and the application methods are aimed at controlling only the target pest or weed based on the results of the monitoring carried out.</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)
7.2.2 (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.		<p>The company applies pesticides based on monitoring results.</p> <p>The farms keep records of pesticide applications made.</p> <p>Agrochemical applications are recorded in the format called the Plant</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



			Protection Product Application Register. Records of some applications were observed during the documentary review. <b>Lima San Jose:</b> Application of agrochemicals for weeds carried out on plot 8 on 4/16/2025. The application record contains the total area applied, LD50, date and time of application, and names of applicators.  <b>La Palma:</b> Application of agrochemicals for weeds carried out on plot 44 on 3/19/2025. The application record contains the total area applied, LD50, date and time of application, and names of applicators.  <b>Palma Adulta:</b> Application of agrochemicals for weeds carried out on plot 452 on 3/6/2025. The application record contains the total area applied, LD50, date and time of application, and names of applicators.	<input type="checkbox"/> Not Applicable (justification required)



			<p><b>El Almendro:</b></p> <p>Application of fungicide for bud rot carried out in plot 200 on May 10, 2025.</p> <p>The application record contains the total area applied, LD50, date and time of application, and names of applicators.</p>	
7.2.3 (C)	Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.		<p>The company has a document called "Use of Pesticides in Integrated Pest, Disease, and Weed Management." This document contains actions to reduce the use of agrochemicals. Some of the activities proposed to reduce the use of agrochemicals include continuous monitoring, timely weed control, sanitary pruning, setting traps for pests, and establishing cover crops in young palm plantations, among others.</p> <p>The agrochemical reduction plan document was also reviewed. It contains a comparison of total agrochemical use over the last two years.</p> <p>According to the records reviewed, there was a decrease in the use of agrochemicals.</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>



7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p>		<p>The company does not use pesticides prophylactically. All pesticide use by the company is based on monitoring results when economic thresholds are exceeded and after other control alternatives have been exhausted.</p> <p>During the inspection of warehouses and review of pesticide application records, it was found that pesticides are not used prophylactically, only as a control.</p> <p>During the interview with the farm maintenance coordinators and workers, they stated that no pesticide applications are made to prevent pest problems in the crop, the applications that are made according to the pest monitoring.</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>
7.2.5	<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</p>		<p>In the Code of Conduct and Sustainability Policy, the company declares its commitment not to use agrochemicals classified as 1A or 1B by the World Health Organization, as well as those included in the Stockholm or Rotterdam conventions and paraquat.</p> <p>The document entitled Use of pesticides in integrated pest, disease, and weed management contains a list of the agrochemicals used by the</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>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application 7.2.5</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>		<p>company. All products used are duly registered with the Institute of Agricultural Protection and Health and their use is permitted.</p> <p>The document Justification for the Selection of Pesticides for Weed and Pest Control also shows that all products used are duly permitted.</p> <p>During the review of product inventory records in warehouses and application records for the year 2025, it was found that the company does not use prohibited products.</p>	
7.2.6 (C)	<p>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.</p>		<p>People who handle or apply agrochemicals have been trained.</p> <p>In interviews with workers who apply agrochemicals, it was found that they have been trained and demonstrated that they have the knowledge to handle pesticides safely.</p> <p>Records demonstrating training in the safe handling, transport, and storage of chemicals, including personal protective equipment and information from agrochemical safety data sheets, were reviewed.</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>

7.2.7 (C)	Storage of all pesticides is in accordance with recognised best practices.		<p>The company has warehouses for the centralized storage of agrochemicals.</p> <p>During the tour of the warehouses, it was observed that access is restricted to trained and authorized personnel only. The warehouses have a perimeter fence and a main entrance gate with a locking mechanism. Internally, the warehouse facilities have padlocked doors, natural ventilation, lighting, waterproof floors, identified emergency exits, spill equipment, an emergency shower, and an eyewash station with water available.</p> <p>All agrochemicals are properly identified and stored according to the nature of each product.</p> <p>The person in charge of the warehouse keeps safety data sheets and inventory records for all stored agrochemicals available.</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)
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.		<p>In the procedure for applying herbicides to oil palms, describe the process for handling empty agrochemical containers, which includes triple washing and perforation.</p> <p>The containers are delivered to an entity accredited for the management of empty agrochemical containers,</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>according to an environmental authorization issued by the Ministry of Environment and Natural Resources on April 11, 2025, valid for five years.</p> <p>The delivery of empty containers is recorded in the form called "Outgoing Register for Empty Agrochemical Containers.</p> <p>Some of the empty container delivery records were reviewed.</p>	
7.2.9 (C)	<p>Aerial spraying of pesticides is prohibited, 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.</p>		<p>The company has not carried out aerial pesticide applications.</p> <p>During the interview with workers, it was confirmed that the company have not applied aerial applications to the crop.</p> <p>In the interview with the interested parties, they stated that the company has not carried out aerial pesticide application on oil palm crops.</p> <p>According to the records of agrochemical use, only ground applications of pesticides have been carried out.</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>
7.2.10 (C)	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>		<p>During the assessment of occupational health conditions, it was verified that workers who perform activities involving exposure to pesticides</p>	<p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p>



			<p>undergo annual medical check-ups, including clinical examinations and specific laboratory tests. In interviews, the applicators confirmed that they had been evaluated by medical personnel and had undergone cholinesterase tests and other complementary analyses. The document review found a consolidated report of medical examinations performed in February 2025 by an authorized occupational clinic, which includes a significant number of pre-employment evaluations with clinical and laboratory tests relevant to the risk. It was found that a group of exposed workers underwent cholinesterase testing, the results of which were within the permitted ranges, and that the responsible professional declared them fit for work with agrochemicals. Likewise, it was confirmed that there is a procedure in place in the event of out-of-range results, which includes temporary reassignment of duties and follow-up through new tests, demonstrating the application of preventive and control measures in line with risk management.</p>	<p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
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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.		<p>The certification unit does not employ underage personnel (under 18 years of age), does not use women in the application of agrochemicals, based on what is defined in the Code of Ethics and Sustainability Policy EN-AD-PC-01, 8/12/2024.</p> <p>- In the documentary review, it was verified that in the Code of Ethics and Sustainability Policy EN-AD-PC-01, 8/12/2024, paragraph 2 defines that the hiring of child labour is prohibited, and paragraph 3 prohibits pregnant or breastfeeding women from working in hazardous activities.</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 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>The certification unit has implemented and maintains a documented procedure for comprehensive waste management in all its operations. The existence of mechanisms for the characterization, separation, and safe storage of ordinary and hazardous waste was verified, as well as adequate signage in the facilities and cultivation areas, which were observed to be clean and tidy during field visits. The company demonstrated</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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			the traceability of the final disposal of waste through the use of authorized external managers, presenting the corresponding certificates of receipt and treatment for hazardous waste (hydrocarbons, filters, impregnated materials) and inert waste, ensuring compliance with current environmental regulations and established internal protocols.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		The decertification unit properly disposes of the different waste generated in its operations. During the field visit to the infrastructure area (warehouses, shelters, mules, and canteens), located in the three farms in the sample, there were identified containers for separating the different types of waste generated.	<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)
7.3.3	The unit of certification does not use open fire for waste disposal.		The certification unit does not use bonfires for the disposal of waste generated in its operations. During the tour of the cultivation areas and infrastructure of the three sample farms, there was no evidence of the use of bonfires for waste disposal, a condition that was confirmed during the	<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)



			interview with plantation workers	
<b>Criterion 7.4:</b>				
Practice maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.				
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.		<p>The company implements good agricultural practices contained in standard operating procedures to manage soil fertility and improve yields. Some of the procedures reviewed were:</p> <ul style="list-style-type: none"> <li>- Fertilization procedure for oil palm, code CD-SA-PO-02, Version 2, dated 3/7/2025.</li> <li>- Procedure for leaf and soil sampling in oil palm, code CD-SA-PO-08, Version 2 dated 2/10/2025.</li> <li>- Procedure for cleaning with brush cutters in oil palm, code CD-SA-PO-04, version 1, last revised on 3/14/2025.</li> <li>- Procedure for identifying and eradicating unproductive palm trees, code CD-SA-PO-11, version 2, last revised on 10/02/2025.</li> <li>- Procedure for applying herbicides in oil palm plantations, code CD-SA-PO-03, version 2, last revised on</li> </ul>	<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>03/07/2025.</p> <ul style="list-style-type: none"> <li>- Procedure for sludge management, code IA-SB-PO-17, version 1, last revised on 9/19/2024.</li> <li>- Procedure for transporting and distributing fiber and pinzote in the field, code CD-SA-PO-18, version 1, last revised on 1/15/2025.</li> </ul> <p>Fertilization is performed based on the results of soil and foliar analysis to apply the precise amounts required by the plants to avoid waste and reduce pollution to the environment.</p> <p>Based on the results of soil and leaf analyses, the company developed and implemented the 2024 fertilization program. According to the records observed, the following chemical formulas were developed and applied: 12.1-7.0-24.0-3.3-3.3(S)-1.2(Zn); Boron 14-15%; 12.0-0.0-25.5-5.4-4.4(S); 13.8-0.0-23.0-5.1-4.1(S); 16.7-0.0-11.9-7.6-6.1(S); 9.6-0.0-25.8-7.1-5.7(S); 18.0-46.0-0.0; 11.3-10.9-28.5-5.0(S); 15.2-14.7-19.2-5.0(S).</p> <p>The 2025 fertilization program currently being implemented by the company in the different oil palm production areas</p>	
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			<p>was also reviewed.</p> <p>Record:</p> <ul style="list-style-type: none"> <li>- Fertilization program implemented during the year 2024.</li> <li>- Fertilization program for the year 2025.</li> </ul> <p>Workers interviewed demonstrated knowledge of the implementation of the different procedures.</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>The company conducts soil and leaf analyses every year.</p> <p>Procedure for leaf and soil sampling in oil palm, code CD-SA-PO-08, version 2, last revised on February 10, 2025. Section 7 describes the equipment and tools required and the entire process to be followed before and during sample collection, preparation, shipment to the laboratory, and analysis in the laboratory until the results are obtained.</p> <p>Soil and leaf sampling is carried out in the company's laboratory in Costa Rica.</p> <p>Record:</p> <p>Soil analysis results 2024.</p> <p>Leaf analysis results 2024.</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>



7.4.3	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.		<p>Sludge management procedure. It describes the process of extraction, disposal, and monitoring of sludge generated during company operations, ensuring environmentally responsible management. In addition, it seeks to ensure that all activities related to sludge are carried out in accordance with current regulations and contribute to environmental protection. The application of sludge in the field adds nutrients to the soil to improve yields.</p> <p>Procedure for transport, distribution of fiber and clamps in the field. Describes the process for transporting and distributing fiber (empty bunches of fresh palm fruit) and pinzote in the company's production areas. The application is carried out on plots identified as having lower organic matter content in order to improve soil conditions and incorporate organic nutrients.</p> <p>The application records made in 2025 were 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)
7.4.4	Records of fertiliser inputs are maintained.		The company has records of fertilizer application. Some of the records reviewed were:	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity



			<p>Lima San José: Record of fertilizer application in plot 3 carried out on 5/17/2025. Record of fertilizer application on 4/10/2025 on plot 3.</p> <p>La Palma: Record of fertilizer application in plot 42 carried out on 2/22/2025. Record of fertilizer application in plot 44 on 3/4/2025. Record of fertilizer application in plot 44 on 8/4/2025.</p> <p>Adult palm: Record of fertilizer application in plot 452 on 5/19/2025. Record of fertilizer application in plot 452 on 9/5/2025.</p> <p>El Almendro: Record of fertilizer application in plot 232 on 21/3/2025. Record of fertilizer application on plot 232 on 3/26/2025. Record of fertilizer application in plot 206 on 4/11/2025. Record of fertilizer application in plot 206</p>	<p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p>
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			on 3/22/2025.	
<b>Criterion 7.5:</b>				
Practices minimise and control erosion and degradation of soils				
7.5.1 (C)	Maps identifying marginal and fragile soils, including steep terrain, are available.		The company has conducted relevant soil studies, confirming the absence of fragile soils or peat bogs in its operations based on official national references. In terms of topography, the company has slope maps and has designated areas with extreme slopes (greater than 25°) for conservation. However, an Opportunity for Improvement was identified regarding the accuracy of the maps: the current classification ranges do not align perfectly with the legal limit of 35% slope, making it difficult to distinguish exactly between cultivable areas and restricted areas within the average slope ranges. The company has been urged to refine its mapping to ensure clarity in regulatory compliance.	<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)
7.5.2	There is no extensive replanting of oil palm on steep terrain.		The company has a soil preparation procedure. Section 7.2 contains additional procedures for renovation on sloping land. Best agricultural practices to be followed when replanting are established.	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement



			During the tour of the productive areas of the farms in the sample, it was observed that no replanting has been carried out on steeply sloping land.	<input type="checkbox"/> Not Applicable (justification required)
7.5.3	There is no new planting of oil palm on steep terrain.		During the tour of the different productive areas of the farms, it was observed that no new plantings have been made on steep terrain. This was confirmed in the interview with the workers and managers of the agricultural area.	<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)
<b>Criterion 7.6:</b> 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>The company has a document titled <i>Justification for not having fragile soils</i>, based on the 2021 National Soil Atlas of Nicaragua. It states that no fragile or marginal soils exist within the company's area of influence.</p> <p>Additionally, the company has a map that classifies farm slopes into five ranges:</p> <ul style="list-style-type: none"> <li>• 0–5°: gentle slope</li> </ul>	<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"> <li>• 5–10°: moderate slope</li> <li>• 10–15°: steep slope</li> <li>• 15–25°: very steep slope</li> <li>• 25°: excessively steep slope</li> </ul> <p>According to the agricultural department, these documents will serve as references for future operations.</p>	
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>The company has a document entitled Justification for not having fragile soils, which describes the types of soil in the company's area of influence and does not identify any fragile or marginal soils. The document was prepared using the 2021 National Soil Atlas of the Republic of Nicaragua as a reference.</p> <p>The company's sustainability policy states that no new operations will be carried out on marginal or fragile soils, if any exist.</p> <p>During the tour of the productive areas of the farms in the sample, it was observed that no new plantations have been established on marginal or fragile soils.</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		<p>The company has a soil preparation procedure. Section 7.1 establishes that topographical information must be used as a reference before any new operation.</p> <p>During 2024, the company renovated lots 39, 40, 43, 46, 47, 50, and 105. For each of the lots, there are maps containing topographic information for designing roads and drainage systems.</p> <p>During the tour of the renovated plots, it was observed that the streets and drainage systems were established based on topography. During the tour of the other productive areas of the farms, it was also observed that the internal roads and drainage systems were constructed based on topographical information.</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)
<b>Criterion 7.7:</b> 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.		<p>The company has a policy of no deforestation, no peat, and no exploitation. It establishes that if plantations are identified on peat soils, experts will be consulted to ensure best</p>	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity



			<p>management practices.</p> <p>The company also has a sustainability policy that includes a commitment not to operate on peat soils.</p> <p>The last new planting was carried out in 2014.</p> <p>According to the statement made to the RSPO secretary, the company does not have peat soils.</p>	<input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)
7.7.2	<p>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).</p>		<p>The certification unit has a clear sustainability policy that prohibits the development of new plantations on peat soils. Although the company has technically determined that it does not operate on this type of soil, an administrative finding was detected: the company did not formalize its peat inventory statement on the platform and in the specific format required by the RSPO within the established deadline (November 2023). The company must rectify this administrative omission in order to fully comply with the transparency requirements of the standard.</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)
7.7.2 (C)	<p>Areas of peat within the managed areas are inventoried, documented and reported</p>		<p>The certification unit has a clear sustainability policy that prohibits the</p>	<input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity



	<p>(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).</p>		<p>development of new plantations on peat soils. Although the company has technically determined that it does not operate on this type of soil, an administrative finding was detected: the company did not formalize its peat inventory statement on the platform and in the specific format required by the RSPO within the established deadline (November 2023). The company must rectify this administrative omission in order to fully comply with the transparency requirements of the standard.</p>	<p> <input type="checkbox"/> Minor Nonconformity  <input type="checkbox"/> Opportunity for Improvement  <input checked="" type="checkbox"/> Not Applicable (justification required)         </p>
7.7.3 (C)	<p>Subsidence of peat is monitored, documented and minimised.</p>		<p>The certification unit has a clear sustainability policy that prohibits the development of new plantations on peat soils. Although the company has technically determined that it does not operate on this type of soil, an administrative finding was detected: the company did not formalize its peat inventory statement on the platform and in the specific format required by the RSPO within the established deadline (November 2023). The company must rectify this administrative omission in order to fully comply with the transparency requirements of the standard.</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>



7.7.4 (C)	A documented water and ground cover management programme is in place.		The certification unit has a clear sustainability policy that prohibits the development of new plantations on peat soils. Although the company has technically determined that it does not operate on this type of soil, an administrative finding was detected: the company did not formalize its peat inventory statement on the platform and in the specific format required by the RSPO within the established deadline (November 2023). The company must rectify this administrative omission in order to fully comply with the transparency requirements of the standard.	<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)	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		The certification unit has a clear sustainability policy that prohibits the development of new plantations on peat soils. Although the company has technically determined that it does not operate on this type of soil, an administrative finding was detected: the company did not formalize its peat inventory statement on the platform and in the specific format required by the RSPO within the established deadline (November 2023). The company must rectify this administrative omission in order to fully comply with the	<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>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, 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>		<p>transparency requirements of the standard.</p>	
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7.7.6 ©	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.		The certification unit has a clear sustainability policy that prohibits the development of new plantations on peat soils. Although the company has technically determined that it does not operate on this type of soil, an administrative finding was detected: the company did not formalize its peat inventory statement on the platform and in the specific format required by the RSPO within the established deadline (November 2023). The company must rectify this administrative omission in order to fully comply with the transparency requirements of the standard.	<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)
7.7.7 (C)	All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ' <i>RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat</i> ', version2 (2018) and associated audit guidance.		The certification unit has a clear sustainability policy that prohibits the development of new plantations on peat soils. Although the company has technically determined that it does not operate on this type of soil, an administrative finding was detected: the company did not formalize its peat inventory statement on the platform and in the specific format required by the RSPO within the established deadline (November 2023). The company must rectify this administrative omission in order to fully comply with the	<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)



			transparency requirements of the standard.	
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.				
7.8.1 (C)	<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>During the assessment, it was verified that the company has a current procedure for water resource management and a monitoring plan that supports efficient water use and pollution prevention. The documentation reviewed shows the cartographic identification of water bodies, differentiated management of water sources, delimitation and management of riparian areas, control of supply sources, and wastewater management both in the plant and in housing units. Likewise, the monitoring program includes control of well consumption, periodic water quality sampling at defined points, restrictions on the application of agrochemicals in protection strips around wells, as well as records of discharges and sludge extraction. It was found that the monitoring is up to date, with recent records during 2025. Interviews with communities and workers confirmed that there are no restrictions on access to water sources used for domestic 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>productive activities, and that access to water for consumption and personal use in the field and camps is guaranteed, demonstrating comprehensive and preventive water resource management in accordance with applicable requirements.</p>	
7.8.2 (C)	<p>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 2017).</p>		<p>A <b>non-compliance</b> was identified in relation to the protection of water bodies. Although the company has procedures in place to delimit protection zones (riparian strips), field inspections revealed that these measures are not consistently applied on all farms. Sections of rivers and wetland edges were found without the required protective vegetation, exposed soil on banks, and evidence of clearing (chapia) within natural channels. The company must implement immediate corrective actions to restore these areas and ensure that all water bodies have their regulatory protection strips.</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>



7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		The Oil Mill has an active and monitored wastewater treatment system. Laboratory analyses confirmed that the water used in the industrial process (which enters with a high organic load) is effectively processed, achieving massive reductions in pollution levels before final discharge. The most recent results from 2025 show a continuous improvement in the quality of treated water, with significantly lower levels of pollutants compared to the previous year, demonstrating the company's commitment to complying with environmental parameters and protecting water resources.	<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	Mill water use per tonne of FFB is monitored and recorded.		It was verified that the company measures the amount of water it uses per ton of processed fruit, with the aim of maintaining efficiency below 1 cubic meter per ton. Currently, although water consumption data is collected monthly, success is only evaluated on an annual basis. Given that monthly variations exceeding the target parameter have been observed, there is an opportunity for improvement by integrating monthly compliance analyses. This would allow the company to identify deviations early	<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)



			on, improve operational decision-making, and ensure that the cumulative average remains aligned with the organization's sustainability objectives..	
<b>Criterion 7.9:</b> <b>Efficiency of fossil fuel use and the use of renewal energy is optimized.</b>				
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>The company has an Energy Efficiency and Fuel Use Plan. The objective of the plan is to ensure the proper management and conservation of energy resources by implementing and monitoring actions to reduce energy and fuel consumption as part of its sustainability commitments.</p> <p>The plan contains a series of activities, such as:</p> <ul style="list-style-type: none"> <li>- Recording energy consumption from electric meters.</li> <li>- Recording fuel consumption.</li> <li>- Turning off equipment when not in use (computers, printers, air conditioners). Turning off lights when not in the office.</li> <li>- Evaluating the technology of the equipment to be used, ensuring that it meets energy efficiency requirements.</li> </ul>	<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"> <li>- Preventive maintenance program for air conditioners.</li> <li>- Preventive and corrective maintenance of vehicles to ensure adequate fuel consumption.</li> <li>- Monitoring of routes to ensure more efficient transportation.</li> <li>- Conduct awareness and training campaigns, according to the annual energy management program.</li> <li>- Identify and keep energy consumption indicators (kWh/RFF) up to date, according to the Energy Management Plan, code UN-SB-BD-26.</li> <li>- Identify and keep fuel consumption indicators (L/RFF) up to date, according to the Efficient Use of Hydrocarbons Plan, code UN-SB-BD-27.</li> </ul> <p>Each area or department of the company is responsible for monitoring and reporting fossil fuel use. Monthly and consolidated fuel consumption monitoring records are available for 2024, which will serve as the basis for measuring the reduction in use.</p> <p>Gasoline and diesel consumption monitoring is recorded in an Excel spreadsheet called "inventory details."</p> <p>The monitoring results are reported to</p>	
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			<p>company management in the “2024 Management Reports.”</p> <p>The records of the activities carried out in accordance with the plan were reviewed.</p> <p>The monitoring and reporting records were reviewed.</p>	
<p><b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions</p>				
7.10.1 (C)	<p>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>		<p>The certification unit has implemented the necessary mechanisms to monitor its greenhouse gas (GHG) emissions, using the PalmGHG calculator and based on verifiable operational data. It was evident that the company has analyzed its emissions results and developed a management plan aimed at reducing them. However, a non-conformity was raised because this reduction plan is not publicly available. The company has been informed of this finding so that it can publish the document in accordance with the transparency requirements of the standard.</p>	<p><input type="checkbox"/> Conform</p> <p><input checked="" 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>7.10.2 (C)</p>	<p>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).</p>		<p>The company does not have any new plantations.</p> <p>During the tour of the company's different production areas, it was confirmed that there are no new plantations. According to the planting database for each plot and an interview with the head of the agricultural area, it was evident that the last planting took place before 2014.</p> <p><b>Evidence:</b> Database for each plot. Observation during field tour. Interview with the head of the agricultural area.</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>
<p>7.10.3 (C)</p>	<p>Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>		<p>The company has identified other sources of contamination.</p> <p>A review of the documentation revealed that the company has carried out the following assessments: Measurement of airborne particles, carried out on April 14, 2025. Based on the results obtained, it is recommended that personnel in the workshop area use PPE. Industrial Hygiene Assessment (noise, lighting, and temperature), conducted on April 14, 2025. A risk map was created to identify areas where conditions need</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 be improved.</p> <p>Based on the results obtained, the company developed an intervention plan containing the activities that the company will implement to improve conditions for workers.</p>	
<p><b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.</p>				
7.11.1 (C)	Land for new planting or replanting is not prepared by burning.		<p>The company has a policy of no deforestation, no peat, and no exploitation. The policy prohibits the use of fire or controlled burning to prepare land or renovate plantations, as well as for burning waste.</p> <p>The company also has a sustainability policy. Fire may not be used in the preparation of new plantations, reseeded, or any new development. Fire is also not permitted for the open-air disposal of waste, and outdoor burning for pest and disease control is prohibited, except in exceptional circumstances.</p> <p>During the tours of the different farms visited, signs prohibiting the use of fire were observed, and in interviews with workers they stated that fire is not used</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)



			on the farms for any activity.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.		<p>The company has a Forest Fire Prevention and Response Procedure. The procedure describes the actions taken to prevent and respond to fires.</p> <p>One of the measures implemented by the company to prevent fires is to carry out patrols (clearing vegetation in the areas bordering the farms) two to three times a year during the summer season.</p> <p>Also, during the summer, the instruction is that all water storage equipment must remain full. A fire cistern with a capacity of 27,000 litres of water is available.</p> <p>To respond to any fire situation, the company formed a fire brigade commission in charge of the agricultural area, and an emergency response brigade is available for the extraction plant. They were created in January 2025.</p> <p>They were trained by firefighters on February 12 and 14, 2025.</p> <p>The company has a warehouse dedicated to storing equipment and materials to respond to fires.</p> <p>In an interview with the brigade members, they demonstrated knowledge of what 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)

			do in the event of a fire at the company.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		<p>The company has a Forest Fire Prevention and Response Procedure</p> <p>The objective is fire prevention and response that strengthens emergency response capabilities and reduces the risk of incidents in the project area, promoting effective collaboration with neighbouring communities in order to protect natural resources, infrastructure, and the safety of all parties involved.</p> <p>The company has identified its neighbouring communities and trained them on how to prevent and respond to fires.</p> <p>During the consultation with community leaders, they stated that they have indeed participated in company events to respond to fires, and that they are familiar with the response equipment and materials that can be used in the event of a fire.</p> <p>Signs with messages about fire prevention have been placed in adjacent areas with neighbouring residents.</p> <p>The company has also developed and distributed informational material on fire</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>prevention and how to respond to any eventuality. The informational material has been shared with community leaders and neighbouring residents of the company's different production areas.</p>	
<p><b>PROCEDURAL NOTE for 7.12</b>          The 2018 RSPO P&amp;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.</p> <p><b>Criteria 7.12:</b>          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.</p>				
<p>7.12.1 (C)</p>	<p>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</p>		<p>According to the results of the LUC analysis, no primary forest has been damaged since November 2005, the certification unit has a LUCA study dated October 2023, version 2.          Table 4 details the changes in land use in different time periods, differentiating between corporate and non-corporate</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>LUCA guidance document.</p>		<p>activities.</p> <p>According to LUCA between 2005-2007: Changes were recorded from soil with scrub, secondary forest, shrubs and scattered trees, to palm cultivation, urban and industrial zones.</p> <p>Between 2007-2009: There was a continuous change in land use from clean grasslands, grasslands with scrub, secondary forest to grasslands, shrubs and scattered trees.</p> <p>Between 2009-2014: Grasslands with scrub converted to bare soils, cleared grasslands converted to oil palm.</p> <p>Between 2014-2017: Bare land and scrubland converted to urban and industrial zone, grassland and scrubland converted to bare land.</p> <p>2017-2022: (HCV assessment). No changes are presented.</p> <p>The analysis was based</p>	
<p>7.12.2 (C)</p>	<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</p>		<p>The decertification unit conducted the HCV assessment study provided by the consulting firm BIOTERRA delivered in February 2022. According to the LUCA, the company has not carried out any new plantations since 2014 but plans to carry out new planting planned for 2026,</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>



	current HCV assessment of those plantations remains valid.		for which a new HCV study, including ARC, was carried out by the company BioAP in November 2024.	<input type="checkbox"/> Not Applicable (justification required)
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.		The certification unit has not established new plantations after 2018; 2014 was reported as the last year of planting	<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)
7.12.3 (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 balance between conservation and</p>		<p>The certification unit has not made any new developments for the production of Bunches of fresh fruit and does not have any ACF areas.</p> <p>The company maintains the palm cultivated area of 13,416 hectares according to the 2023 LUCA study. According to the information in the application for the audit, the same cultivated area as in the previous year has been maintained.</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)



	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.			
7.12.4 (C)	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>The certification unit conducted the HCV assessment study provided by the consulting firm BIOTERRA delivered in February 2022.</p> <p>According to the LUCA, the company has not carried out new plantations since 2014 and implements the management and monitoring plan UN-SB-BD-12, year 2024-2025, to protect and monitor the status of HCVs (1, 2, 3, 4, 5 and 6), present at the landscape, wetlands and river levels.</p> <p>The monitoring report (Evidence of Compliance-AVC) was reviewed, which reflects the progress made during the year 2024, achieving the implementation of what was established in the management and monitoring plan.</p> <p>. The monitoring plan and results were shared with 16 communities in April and May 2025.</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)
7.12.5	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		The HCV study conducted February 2022, identified the presence of HCV 1 to 6, at a broader landscape level, with emphasis on wetlands, water bodies	<input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity



	<p>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>and community heritage outside of the farm property, the fragile soils studies do not identify the presence of peat soils, there are no conflicts over customary rights.</p> <p>The HCV study shows an FPIC process, with full disclosure of the proposed project to all potentially affected communities and stakeholders, the plantations were established in 2000 to 20214, the HCV study did not identify any reduction of rights to local communities</p>	<p><input type="checkbox"/> Minor Nonconformity  <input type="checkbox"/> Opportunity for Improvement  <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>The certification unit protects the different species identified and present in the plantations, the HCV study identified: At the level of flora, different species of tree and herbaceous plants, in the fauna at least 42 species of birds are identified, most of them within the national conservation law.</p> <p>In the training program, the workforce is made aware of the species present and RAPs, to avoid any damage to the flora and fauna in the fields. Disciplinary measures to be implemented if a worker fails to comply with the measures to protect the identified species present on the farms have been socialized.</p> <p>The internal work regulations establish</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>



			disciplinary measures for personnel identified as being involved in hunting activities that threaten the protection of wildlife.	
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.		<p>The certification unit conducts annual monitoring of the conditions of identified HCVs and RAP species and other species present in the plantations.</p> <p>The company implements the UN-SB-BD-12 management and monitoring plan for the years 2024-2025. Monitoring of the species present is carried out by a team of expert professionals. The report (Evidence of Compliance-HCV, Biological Diversity) was reviewed, concluding that various fundamental ecological processes continue in natural ecosystems and agroecosystems.</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>7.12.8 (C)</p>	<p>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.</p>		<p>The audit assessed the certification unit's progress in complying with the Remediation and Compensation Procedure (RaCP) related to historical land use changes. It was confirmed that the organization has made progress in the preliminary stages, achieving approval of the concept note and submitting the compensation plan to the RSPO Secretariat. However, a non-conformity was identified because, at the time of the assessment, the remediation and compensation plan had not yet received final formal approval from the standard. The company is in the process of following up with the RSPO to obtain this validation.</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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## 6. Summary of Audit Findings

### 6.1 Positive and noteworthy findings

No.	Positive finding
1	During the audit process, the company was transparent and open to areas for improvement.
2	Good coordination of timelines during the audit. Friendliness, attentiveness, and cordiality of the entire team.
3	Adequate follow-up on activities related to continuous improvement.
4	Motivated and satisfied employees. Trained staff and good working environment.
5	Openness and honesty of the team in facilitating access to the evaluation of indicators.
6	Employees have gained an understanding of the training related to their work and environmental protection actions.
7	Excellent image among local communities, entities, government, private producers, and contractors who were interviewed during the consultations, as the largest generator of employment in the region, a driver of local economic development, and for promoting the improvement of the quality of life for private producers.
8	They recognize that there is an excellent relationship and ease of communication for managing PQRS with management and the social manager.
9	Contribution to environmental conservation, reforestation programs with the inclusion of the community and school children.



6.2 Non-conformities and opportunities for improvement

<b>Summary of nonconformities and opportunities for improvement under the RSPO Principles &amp; Criteria</b>				
<b>Principle</b>	<b>Major</b>	<b>Minor</b>	<b>Opportunities for Improvement</b>	<b>Total No Findings</b>
<b>Principle 1: Behave Ethically and Transparently</b>	-	-	-	<b>0</b>
<b>Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction.</b>	2.1.1(C)	2.1.2	-	<b>2</b>
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience (Includes IP and/or MB Module)</b>	3.6.1(C), 3.6.2(C), 3.8.7(C), 3.8.9(C)	3.3.2	3.8.5 (C)	<b>6</b>
<b>Principle 4: Respect Community and Human Rights and Deliver Benefits</b>	-	-	4.2.1(C)	<b>1</b>
<b>Principle 5: Support Smallholder Inclusion</b>	-	-	-	<b>0</b>
<b>Principle 6: Respect Workers Rights and Conditions</b>	6.2.2(C), 6.2.3(C)	6.5.4	6.2.5	<b>4</b>
<b>Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment</b>	7.8.2(C), 7.10.1(C), 7.12.8(C)	7.1.2, 7.7.2	7.5.1(C), 7.8.4	<b>7</b>
<b>Certification Systems Document</b>	-	-	-	<b>0</b>
<b>Total</b>	<b>10</b>	<b>5</b>	<b>5</b>	<b>20</b>





## 7. Nonconformity(ies) Issue in this Audit

<b>Indicator Number</b>	2.1.1(C)
<b>Nonconformity Number</b>	1
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>            The certification unit does not comply with some of the applicable legal requirements.</p> <p>During the document review, it was found that, in Nicaragua, companies that employ armed personnel for internal security functions are subject to compliance with the requirements established in Law No. 903, the Private Security Services Law. Although the company has identified this legislation in its legal requirements matrix, there is no evidence of documents supporting compliance with Article 11, which establishes the obligation to have an operating license issued by the competent authority.            Furthermore, considering that security personnel carry firearms, the company must ensure the safe storage, updated inventory, and control of weapons.</p> <p>- Non-compliance with Law 618, General Law on Occupational Health and Safety.</p>	



Chapter XI (water supply), Articles 102 to 105, establishes the company's responsibility to provide drinking water to workers in their workplaces; however, drinking water is not being supplied to workers.

During field visits to the Lima San José, Palmas Adultas, and El Almendro farms, no water was observed in the workplaces where workers could replenish their supplies if they ran out of the water they brought from home. At the Almendros farm, access to water is through a hand-dug well (Malacate) located in the mule yard, and there is no evidence of the water's potability.

**Evidence:**

- Law No. 903, Private Security Services Law
- Law 618, General Law on Occupational Health and Safety
- Law No. 510, Law for the Control and Regulation of Firearms, Ammunition, Explosives, and Other Related Materials
- Interview with workers
- Field observation.

**Root Cause Analysis**

**Security service license (guards)**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The company does not have an operating license issued by the competent authority to carry out its internal security activities with armed personnel	Because the armed personnel only have a license to use weapons	Because the personnel are accredited as private security guards, but the company does not have a license for this purpose	Because it had not applied for such a license from the competent authority	Because the personnel responsible for internal security were unclear about its applicability	Because visits from the Ministry of Labor and the National Police had been attended to and they had never been questioned



	2. Environment	The company does not have an operating license issued by the competent authority to carry out its internal security activities with armed personnel	Because there are no security service companies operating in the area	Because there is no demand for this type of service due to the lack of companies requiring security, which increases operating costs	Because the location of the plantation and extraction plant is in one of the most remote and rural municipalities in the country		
	3. Material/Raw Material						
	4. Method	The company does not have an operating license issued by the competent authority to carry out its internal security activities with armed personnel	Because the license was not applied for with the relevant authority	Because it was interpreted that the obligation only applied to companies that provide commercial security services to third parties, not to those that perform such activities internally	Because there was ambiguity in the interpretation of the regulatory framework and no formal clarification was requested from the competent authority	Because the critical regulations were not validated with the regulatory body regarding their applicability	



	5. Machinery/Equipment						
	6. Measurement						
<b>Drinking water supply</b>							
<b>Analyze: What are the causes and why?</b>							
	<b>Category</b>	<b>Root cause</b>	<b>Why 1</b>	<b>Why 2</b>	<b>Why 3</b>	<b>Why 4</b>	<b>Why 5</b>
	1. Labor	Supervisors and workers are unaware of actual hydration requirements	Because they have not received training on the subject	Because it is not included in the SySO plan	Because SySO did not prioritize hydration as a critical training topic		
	2. Environment	High temperatures to which field workers are exposed	Because work is carried out in the open air	Because although they work outdoors, actual hydration requirements were not analyzed	Because climatic variables were not analyzed in the risk assessment		
	3. Material/	Erroneous work practice in	Because it was assumed that	Because needs were not	Because there is no		



	Raw Material	considering that water is the responsibility of the worker and that consumption is 1 gallon per day	this amount was sufficient for the workday	assessed according to climate and type of task	minimum water consumption guideline		
	4. Method	There is no operating procedure for defining the amount of water required	Because the existing system was considered to be working	Because the risk was identified but not validated in the field	Because there is no methodology that connects identified risk with applied control		
	5. Machinery/Equipment	There are no fixed or mobile points for replenishing drinking water on the farm	Because it was expected that the water brought from home would cover the entire day	Because no logistics for replenishment in the field were defined	Because no responsibility was assigned to ensure continuous availability		
	6. Measurement	There is no measurement of whether the water supplied or delivered is sufficient or drinkable	Because there are no indicators or verification in audits	Because these controls are not included in the checklists	Because legal compliance in hydration has not been systematically audited		
<b>Correction(s)</b>	<b>Security service license (guards)</b>						



	<p>1. Initiate the process for contracting private security services by a third party that complies with applicable national legislation.</p> <p><b>Drinking water supply</b></p> <p>1. Supply drinking water using a mobile container (water tank) properly identified with labels that say "Drinking Water" at strategic points on the farms.</p>																																						
<p><b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i></p>	<p><b>Security service license (guards)</b></p> <table border="1" data-bbox="685 571 2016 1289"> <thead> <tr> <th colspan="6">Action Plan (Implement actions)</th> </tr> <tr> <th rowspan="2">Start Date</th> <th rowspan="2">Action</th> <th rowspan="2">End date</th> <th colspan="2">Names of those responsible</th> <th rowspan="2">% progress</th> </tr> <tr> <th>To do</th> <th>Verify</th> </tr> </thead> <tbody> <tr> <td>8/1/2025</td> <td>Put the private security service out to tender with companies duly accredited by the competent authority.</td> <td>8/25/2025</td> <td>Comptroller</td> <td>General Management</td> <td></td> </tr> <tr> <td>8/25/2025</td> <td>Hire an internal security service provider that complies with the requirements established in Law No. 903, Private Security Services Law.</td> <td>9/1/2025</td> <td>Comptroller</td> <td>General Management</td> <td></td> </tr> <tr> <td>8/26/2025</td> <td>Provide comprehensive induction training to security guards assigned to work in the company's operations, to ensure they work safely, efficiently, and productively.</td> <td>8/29/2025</td> <td>HR-Sustainability</td> <td>General Management</td> <td></td> </tr> <tr> <td>10/1/2025</td> <td>Update the contractor database to reflect private security services</td> <td>10/15/2025</td> <td>Controller</td> <td>General Management</td> <td></td> </tr> </tbody> </table>	Action Plan (Implement actions)						Start Date	Action	End date	Names of those responsible		% progress	To do	Verify	8/1/2025	Put the private security service out to tender with companies duly accredited by the competent authority.	8/25/2025	Comptroller	General Management		8/25/2025	Hire an internal security service provider that complies with the requirements established in Law No. 903, Private Security Services Law.	9/1/2025	Comptroller	General Management		8/26/2025	Provide comprehensive induction training to security guards assigned to work in the company's operations, to ensure they work safely, efficiently, and productively.	8/29/2025	HR-Sustainability	General Management		10/1/2025	Update the contractor database to reflect private security services	10/15/2025	Controller	General Management	
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8/26/2025	Provide comprehensive induction training to security guards assigned to work in the company's operations, to ensure they work safely, efficiently, and productively.	8/29/2025	HR-Sustainability	General Management																																			
10/1/2025	Update the contractor database to reflect private security services	10/15/2025	Controller	General Management																																			



	10/15/2025	<p>Perform a legal due diligence assessment of the private security contractor based on the form used by the company. The following compliance documents must be requested:</p> <ul style="list-style-type: none"> <li>a. Service contract with RSPO clauses</li> <li>b. Valid license to carry weapons</li> <li>c. Accreditation for private security guards</li> <li>d. Guard training certificates and records</li> <li>e. Proof of social security payments</li> <li>f. Valid permits to carry weapons</li> <li>g. Proof of salary payments</li> <li>h. Company induction records for contracted personnel</li> <li>i. Inventory of weapons and ammunition</li> </ul>	10/30/2025	Comptroller	General Management	
	10/15/2025	<p>Submit an operational plan for the physical security service that includes:</p> <ul style="list-style-type: none"> <li>a. Shift schedule by position</li> <li>b. Coordination of transportation from home to work and vice versa</li> <li>c. Shift handover protocol, including the firearm assigned to each position</li> <li>d. Handling of ammunition assigned to each position</li> </ul>	10/30/2025	Controller	General Management	
	10/15/2025	<p>Create a document that provides clarity and easy understanding of:</p> <ul style="list-style-type: none"> <li>a. Analysis of critical positions that require security and the use of weapons</li> <li>b. How to proceed with the company's direct personnel who worked as security guards</li> <li>c. Terms of service contracting (temporary or permanent)</li> </ul>	10/30/2025	Controller	General Management	



10/15/2025	Add as an applicable requirement in the annual legal assessment that the company must comply with, allowing for monitoring and eliminating the opportunity to operate through a third party with an expired license.	Permanent	Comptroller	General Management	
<b>Drinking water supply</b>					
<b>Action Plan (Implement actions)</b>					
Start date	Action	End date	Names of those responsible		% progress
			To do	Verify	
7/15/2025	Define hydration needs for field work, taking weather conditions into account	7/30/2025	Cayley Putchie	Franko Guzman	
6/16/2025	Design and implement a supply and hydration procedure for field work	7/30/2025	Cayley Putchie	Franko Guzman	
6/20/2025	Purchase a tanker to supply water to containers assigned for drinking water storage.	8/30/2025	Calixto Calderón	Martín Vargas	
6/20/2025	Establish fixed water distribution points in work areas for resupply.	7/20/2025	Milton Pérez Yersson Chavez	Leonidas Blandón	



	July 30, 2025	Installation of drinking water storage tanks at defined strategic points	August 30, 2025	Maria José Traña	Martín Vargas	
	7/30/2025	Allocation of mobile infrastructure for drinking water supply for field work	8/30/2025	Darreyl Morales	Martín Vargas	
	7/23/2025	Train operational staff and field supervisors on heat stress and hydration in the workplace	7/27/2025	Cayley Putchie	Franko Guzman	
	7/28/2025	Include the availability of drinking water as a mandatory item on field assessment forms.	7/30/2025	Cayley Putchie Antonio Obregón	Franko Guzman José Uriel López	
	7/28/2025	Conduct periodic analyses of water potability through microbiological testing	Periodical	Environmental manager	Sustainability	
	7/16/2025	Perform a microbiological analysis of the water distributed on farms	09/30/2025	Human Capital	Management	
	<b>Date of Response</b>	18.07.2025				



<p><b>Audit Team Conclusion</b> (including any evidence reviewed)</p>	<p>The company presents the following evidence for the closure of its non-conformities:</p> <p>Security service license (guards) - Correction</p> <p>* Email records for the bidding process for physical security services. This series of emails confirms that ESESA will be the company contracted for a period of 4 months. Approval date: 08/14/2025.</p> <p>* A private security services contract is presented between "EMPRESA DE SERVICIOS ESPECIALES, SOCIEDAD ANONIMA, (ESESA)" and "CUKRA DEVELOPMENT CORPORATION S.A", referred to as "The Client." The purpose of the contract is the provision of private security services by ESESA in the Municipality of Kukra Hill, RACCS, for which six surveillance posts with six 24-hour guards will be available. The contract enters into force on September 1, 2025, and will have a duration of four months, ending on December 31, 2025.</p> <p>*Additionally, another contract is presented under the same conditions described above, with a date that will come into force once the current one ends. The projected and signed date is January 1, 2026, until December 31, 2026. This contract has been signed by both parties since November 5, 2026.</p> <p>* An "Initial Induction Record" for the Cukra Development Corporation is presented, dated August 29, 2025. The induction was given by IARAAS staff to 14 participants and lasted three hours, from 7:30 a.m. to 10:30 a.m. The most important topics covered in the induction were divided into four main areas:</p> <ul style="list-style-type: none"> <li>• General: The Mission, Vision, Code of Ethics, and Sustainability and No Deforestation, No Peat, No Exploitation (NDPE) Policies were covered.</li> <li>• Social Management: Respect for human rights, contribution to local development, the procedure for Petitions, Complaints, Claims, and Suggestions (PQRS), and the socialization of the Gender Committee were discussed.</li> <li>• Environmental Management: This included the environmental management policy, waste management, rational use of resources (water, energy, soil), and the protection of wildlife and forest areas.</li> <li>• Occupational Health and Safety (OHS): Workplace risks, the use of Personal Protective Equipment (PPE), OHS managers, and accident and emergency procedures were addressed.</li> </ul> <p>* Contractor database record listing the Special Services Company ESESA with contact name, ID number, employer INSS number, RUC number, contractor telephone number, description of activity, contract start and end dates, and contractor address.</p> <p>* The following evidence is presented as an assessment of this contractor's due diligence:</p> <p>- Due Diligence Assessment Record" carried out on October 14, 2025, to audit the security contractor ESESA. The assessment, carried out by Francis Co Bermudez, verified 33 requirements. According to the initial checklist, ESESA complied with most of the documentary requirements, such as having a valid contract with RSPO clauses, a security license, induction tests, and salary and insurance payments (INSS). However, the checklist marked the submission of police records, copies of accreditation, and the weapons inventory as "Non-Compliant."</p>
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	<p>Nevertheless, the final analysis table in the document shows 100% compliance for the 14 guards listed, indicating that they "DO" have all the documentation, including police records and accreditation.</p> <ul style="list-style-type: none"> <li>- Accreditation for private security guard. This file is a compilation of official credentials issued by the Nicaraguan National Police to security personnel. It includes numerous "Accreditations for Private Security Guards" [e.g., cite: 359, 375, 392, 432] and at least one "License to Use Firearms." Each accreditation shows the guard's name, ID number, and license expiration date (most expire between 2025 and 2029) [e.g., cite: 367, 383, 401, 534]. All accreditations specify clear prohibitions, such as working without carrying the accreditation, drinking alcohol during working hours or while in uniform, and misusing the uniform.</li> <li>- Training certificates. This document groups together the individual certificates [e.g., cite: 755, 780, 806] that ESESA issued to its security guards. These certificates confirm participation in seminars on "LAW 510" (weapons control) and "LAW 903" (private security services) given by the Adiact Training and Education Institute. The training lasted 4 hours [e.g., cite: 766, 791, 818] and took place on September 3 [e.g., cite: 766, 791] and 4, 2025 [e.g., cite: 945, 968]. The certificates were issued in León on September 10, 2025, and are signed by Alfredo José Ventura Hernández, Operations Manager at ESESA.</li> <li>- Training report and records. This document is a report on the training provided to security guards at Cukra Development Corporation by ESESA and the ADIACT Training and Education Institute. The training took place on September 3 and 4, 2025, and focused on the regulatory frameworks for private security in Nicaragua, specifically Law 510 (on firearms) and Law 903 (on private security services). The main objective was for the guards to understand their duties, legal limits (such as not usurping the functions of the authorities), the sanctions regime, and the rational use of force. The document includes the attendance lists of the 14 participants, divided into two groups of seven for each day.</li> <li>- Register of Firearm Use Licenses issued by the National Police of the Republic of Nicaragua. The licenses are in the names of various individuals. Each license, generally valid for five years, details the name, ID number, and address of the holder. All stipulate key prohibitions, such as carrying the weapon without the corresponding license, using it outside of service hours, and misusing or intimidating others with it.</li> <li>- Payment records for the "FIRST HALF OF SEPTEMBER 2025 PAYROLL" and the "SECOND HALF OF SEPTEMBER 2025 PAYROLL." These records detail employee salary payments. The payrolls break down items such as regular salary, extra salary, deductions (such as INSS2 and IR), and the final "Net to Receive" for each worker in those periods.</li> <li>- Record of payment of two invoices paid to the Nicaraguan Social Security Institute (INSS) by "EMPRESA DE SERVICIOS ESPECIALES, SOCIEDAD ANONIMA," with RUC J0310000035547. The first invoice corresponds to the period 08/2025 (August) for a total of C\$ 987,056.91 for 217 workers, and the second to the period 09/2025 (September) for C\$ 982,184.58 for 220 workers. The file also includes the "Salary Details" for each employee on the "ESESA SER SAN ANTONIO" payroll for both months, specifying the employee and employer contributions.</li> </ul>
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	<p>- Records of accreditation licenses for the security and training service provider. This file compiles various "LEGAL DOCUMENTS" from "EMPRESA DE SERVICIOS ESPECIALES S.A. (ESESA)", founded in Nicaragua in 1992. It includes an Operating License from the National Police for "PHYSICAL SURVEILLANCE AND PERSONAL PROTECTION OF 751 OR MORE SECURITY GUARDS" (valid until 2027) and another license for "TRAINING AND EDUCATION IN PRIVATE SECURITY SERVICES" (valid until 2029). It also holds a license from the DAEM (Arms Directorate) as a "TRAINING CENTER" (valid until 2026) and a license from the Ministry of Labor in the area of "Occupational Health and Safety" (valid from 2025 to 2027).</p> <p>* Shift handover and receipt protocol, including firearms: This document is an instruction manual from the ESESA company detailing the official procedure for the handling, handover, and receipt of firearms and ammunition. The objective is to establish a clear, standardized, and documented procedure for the delivery and receipt of weapons. The purpose is to ensure the full traceability of weapons, the safety of personnel, and compliance with Nicaraguan legislation, specifically Law No. 510 (Weapons Law) and Law No. 903 (Private Security Services Law).</p> <ul style="list-style-type: none"> <li>• Delivery Procedure: <ul style="list-style-type: none"> <li>○ Before delivering a weapon, the warehouse manager must verify that it is unloaded, registered with the police authority (DAEM), and in optimal condition.</li> <li>○ A "Delivery Record" must be completed, including the serial number, model, caliber, recipient's details, amount of ammunition, and signatures of both parties.</li> <li>○ A key note is: "Under no circumstances shall a loaded weapon be delivered."</li> </ul> </li> <li>• Receiving Procedure: <ul style="list-style-type: none"> <li>○ At the end of the shift, the guard hands over the weapon and a visual and functional inspection is carried out.</li> <li>○ It must be confirmed that the weapon is returned unloaded, with the chamber open and the magazine removed and empty.</li> <li>○ Any anomalies must be recorded in an Incident Report.</li> </ul> </li> <li>• Security Log: <ul style="list-style-type: none"> <li>○ This is defined as an official physical book for administrative and internal control purposes.</li> <li>○ It is used for the daily recording of all activities, developments, and, crucially, the delivery and receipt of firearms.</li> <li>○ Entries must be made in permanent ink, without crossings-out or blank spaces.</li> <li>○ It must include the date/time, names and signatures of the incoming and outgoing guards, and details of the weapon (serial number, type, caliber) and ammunition.</li> </ul> </li> </ul> <p>* CDC Weapons and Ammunition Inventory: This document is a table titled "WEAPONS INVENTORY BY POST." It lists a total of 6 firearms, detailing the brand (Maverick, Taurus, Lorcin), serial number, caliber (12 and .38), and type of weapon (Shotgun, Revolver, Pistol). It includes the carry license number for each weapon, its expiration date, and confirms that all are "VALID." Specify the amount of ammunition assigned to each (between 4 and 6</p>
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	<p>cartridges). Assign each weapon to a specific location: Campus 53, Campus 170, Kukra Parking Lot, Red Warehouse, Plant Gate, and Cukra Gate.</p> <p>* September and October shift schedule by position: This document contains the rotation schedules ("ROLL") for security personnel for the months of September 2025 and October 2025. It organizes shifts by employee code and name. It details the daily schedule for each guard, specifying 12-hour day shifts ("12 HD"), 12-hour night shifts ("12 HN"), or days off ("LIBRE"). Assigns guards to specific posts, matching those in the weapons inventory (e.g., "Kukra Parking Lot," "Red Warehouse," "Plant 53," "Plant Gate," "Cukra Gate," and "Plant 170").</p> <p>* The security company's Operational Plan is presented: ESESA's Operational Plan for Cukra Development Corporation, effective October 1, 2025, details the security service to protect the company's assets, including personnel, property, and information. The plan is implemented at six specific locations (Kukra Parking Lot, Bodega Roja, Plantel 53, Portón Planta, Portón Cukra, and Plantel 170), covered 24 hours a day by a team of 14 security guards. Key responsibilities include controlling access for personnel and vehicles, preventive surveillance, protecting assets such as palm fruit and fuel, and constantly reporting developments through logs. All personnel are supervised by telephone by a security chief from ESESA's headquarters in León, and the service will be evaluated by Cukra after the third month of the four-month contract.</p> <p>* Scanned copies of the Nicaraguan identity cards of 14 individuals are submitted. The names appearing on these cards match those of the security guards listed in the ESESA company's shift schedules.</p> <p>* An informational document is presented: This is a confidential internal document from the Comptroller's Department of Cukra Development Corporation. It describes Critical Positions: It defines the criteria (e.g., high economic value, isolated areas, night shifts) to justify armed security. It concludes that the company has six critical posts that require weapons: Kukra Parking Lot, Red Warehouse, Plant 53, Plant Gate, Cukra Gate, and Plant 170. Outsourcing Decision: Explains that the company chose to outsource armed security services instead of using its own personnel. Internal personnel who previously worked as guards were reassigned to other functions (such as good practices inspector, unarmed surveillance, or logistical support) and were not dismissed. Type of Contract: A short-term temporary contract was chosen, from September 1 to December 31, 2025. This is because Cukra is applying for its own security operating license. If that license is denied, the company will seek a long-term contract.</p> <p>* Registration of Incorporation of legal requirement applicable to the legal entity: This document is a record of legal compliance with Nicaraguan Law No. 903 ("Private Security Services Law"). Operating License: This establishes that in order to offer and sell private security services (as ESESA does), an "Operating License" must first be obtained. Authority: This license is issued by the Nicaraguan National Police and is valid for five years. "In-House" Security: Article 18 clarifies that companies that organize their own internal security with personnel on their payroll (the model to which Cukra aspires) must also register and pay the license fee paid by security providers.</p>
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	<p>* Police record requested upon entering ESESA is presented: This annex contains the "Certificates of Conduct" (police records) of ESESA security guards. Purpose: All certificates were specifically requested for "PROCEDURES LAW 510," which is the firearms law mentioned in the ESESA protocol. Results: Thirteen of the fourteen guards (including Felix Palacios, Liuvén Salinas, and Bernardo Barrera) are listed as having "NO RECORD" (no criminal record). Exception: Jose Ramon Soza Lacayo's certificate indicates that he has a criminal record for a theft case in 2005, but the same document clarifies that the case was closed due to "LACK OF MERITS" and that the record was legally expunged in 2021.</p> <p>Drinking water supply</p> <p>* Water Needs Analysis Document Agricultural Workers. This technical analysis details the method for calculating the water supply needed for agricultural workers at Cukra Development Corporation to prevent heat-related illnesses. The methodology is based on the Heat Index (HI), which combines temperature and humidity to determine an hourly water consumption rate (0.5, 0.75, or 1.0 L/h) according to US Army and OSHA/NIOSH guidelines. The document includes a summary table for 2024 showing that January, May, August, and September are the months with the highest water requirements (category B), requiring 6 liters of water per worker during an 8-hour workday, and establishes that the maximum daily consumption for a crew can reach 228 liters.</p> <p>* The UN-CH-PO-13 hydration procedure issued on August 4, 2025, is presented. This document establishes the formal hydration procedure for Cukra Development Corporation employees. It specifies that the Occupational Health and Safety department is responsible for calculating water requirements and training staff, while area managers must provide gallons and transport drinking water for refilling in the field. The procedure distinguishes between agricultural personnel, who use gallons refilled by tanker trucks, and industrial and administrative personnel, who use water dispensers. In addition, it is based on the "Hydration Needs Matrix" and stipulates annual training on heat stress.</p> <p>* Training record for POE Hydration Implementation Dist A is presented. This training record documents the session on the implementation of the hydration procedure, aimed at supervisors in District A of the Harvest department. The training took place on September 3, 2025, between 1:40 PM and 3:40 PM, with the aim of ensuring that the 10 supervisors in attendance were fully aware of the procedure. Similarly, a training record is presented on the "Implementation of the Hydration Procedure and Material Delivery Record," held on September 16, 2025, for the Agriculture Department. The session, given to eight harvest supervisors, aimed to strengthen knowledge of the hydration procedure and the correct document management associated with it.</p> <p>* Multiple records of training sessions on "Heat Stress and Hydration in Agricultural Work" given to a large number of Cukra Development Corporation staff during the month of August 2025 are presented. The sessions sought to train workers in the Harvest and Agricultural Services departments on the concepts of heat stress, the importance</p>
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	<p>of hydration, the symptoms of dehydration, and preventive and emergency measures to avoid adverse health effects.</p> <p>* The material used to train agricultural workers on heat stress and hydration is presented. The talk explains what heat stress is, its effects on the body such as cramps and dizziness, and how to prevent it by taking breaks in the shade and wearing appropriate clothing. It emphasizes the importance of drinking water every 15-20 minutes without waiting to feel thirsty and teaches how to recognize the symptoms of dehydration (headache, dry skin, dark urine) and the steps to take in an emergency.</p> <p>* OHS audit report submitted. This report corresponds to an Occupational Health and Safety (OHS) audit carried out on August 28, 2025, on the harvesting team at La Palma farm, Lot 1. The audit showed a compliance rate of 96%, identifying as non-compliances that the supervisor was not wearing the regulation red hat, one worker had a damaged apron, and another was carrying a machete without its protective sheath. A report is also presented on the Occupational Health and Safety (OHS) audit carried out on August 28, 2025, at the Borbollon farm, Lot 115, for the personnel supervised by Daniel Umaña. The team achieved 95% compliance, but several non-conformities were noted, including aprons in poor condition, workers with machete knives without protective sheaths, improper placement of tools when sharpening them, and poorly stacked palm fronds in the field.</p> <p>* Record of semi-annual water quality analysis Plant 170. This is a report of results from the Pronic Environmental Laboratory, dated May 2, 2025, on a water quality analysis for Cukra Development Corporation. The sample, taken from a well in the agrochemical warehouse at Plant 170 on April 25, 2025, tested negative for Total Coliforms, Thermotolerant Coliforms, and E. Coli, complying with the standard. The residual chlorine level was 0.5 mg/L, which is at the minimum limit recommended by the reference standard.</p> <p>* Semiannual Water Quality Analysis Record for Plant 53. This laboratory report, issued by Laboratorio Ambiental Pronic on May 2, 2025, for Cukra Development Corporation, details the analysis of a drinking water sample taken on April 25, 2025, from a well in the agrochemical warehouse at Plant 53. The bacteriological results for Total Coliforms, Thermotolerant Coliforms, and E. Coli were negative, meeting quality standards. However, residual chlorine was measured at 1.1 mg/L, slightly above the recommended maximum of 1.0 mg/L.</p> <p>* Two water analysis reports from the LAQUISA laboratory for Cukra Development Corporation are presented, both issued on September 2, 2025. The samples were taken by LAQUISA on August 28, 2025, at two different locations: the first in District A, Plant 53, and the second in District B, Plant 170. Both water samples were analyzed for Total Coliforms, Fecal Coliforms, and Escherichia Coli, yielding a result of "Not Quantified" (NC &lt;1.8 NMP/100 ml) in all cases, indicating that the water in both tanks is free of bacteriological contamination according to the parameters measured.</p> <p>* Photographic evidence is presented of four tanks located at different distribution points. Similarly, photographs are presented of mobile infrastructure to bring drinking water to the field during working days.</p> <p>The evidence is accepted and the NC is closed on 10/11/2025.</p>
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<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
<b>Date of Closure:</b>	10.11.2025

<b>Indicator Number</b>	3.6.1(C)
<b>Nonconformity Number</b>	4
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<b>Non-Conformity Statement:</b> Not all hazards and risks for some of the extraction plant's operating activities have been identified. <b>Extraction Plant</b>	



The company has a Procedure for the Identification, Evaluation, Inspection, and Reporting of Occupational Risks with code UN-CH-PO-05, developed on 01/03/2025, which defines the comprehensive methodology that allows for the identification, evaluation, inspection, and reporting of occupational hazards, providing a safe and healthy work environment for all employees, with reference to Ministerial Agreement JCHG-000-08-09 Technical Procedure for Occupational Health and Safety for Risk Assessment in the Workplace.

This assessment and update, when required, will be carried out in the Occupational Risk Matrix document, code CD-CH-BD-04. However, during the review of this matrix, there is no evidence of the identification of hazards as defined in the procedure, but only the assessment of risks, which are not consistent with the conditions of the work area.

During the tour of the STAR area, it was observed that two workers were cleaning the inner slope of a lagoon with a depth of approximately 4 meters, without the implementation of control measures to ensure their safety.

Likewise, in this same area, several power boxes associated with the motors used to extract sludge from the ponds were observed, which do not have identification of the type of voltage or signage warning of electrical hazards.

Furthermore, there are no access restrictions at the main entrance to the STAR, nor are there any signs warning of associated dangers, such as the risk of drowning, the dimensions of the ponds, which range in depth from 3.5 to 4 meters, or the temperature.

**Evidence:**

- Procedure for the identification, assessment, inspection, and reporting of occupational hazards, code UN-CH-PO-05, dated January 3, 2025.
- Initial risk assessment report, Consultant in hygiene, occupational safety, and industry, 03/05/24 and 04/01/2025.
- Tour of the extraction plant

**Root Cause Analysis**

**Inconsistency in the risk matrix**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The OHS manager did not participate in the preparation or review of the matrix, which was done by	Because it was assumed that the consultant would handle the methodology appropriately	Because the manager did not have a defined role in subsequent technical review	Because internal validation responsibilities were not established		



	an external provider					
2. Environment						
3. Material/Raw Material						
4. Method	The institutional hazard identification procedure was not followed	Because the consultant used his own criteria to develop the matrix	Because compliance with the internal procedure was not reviewed	Because there was no review or quality control of the deliverable		
5. Machinery/Equipment						
6. Measurement	The quality and consistency of the final deliverable was not validated	Because there is no formal review procedure for products from external consultants	Because the consultant's technical judgment was relied upon without a second opinion	Because there is no quality assurance mechanism after outsourcing		



**Lack of safety measures in STAR tasks and safety labeling on engines and gaps**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	Workers do not identify the hazards and risks associated with slope cleaning tasks	Because they have not received training or briefings related to these risks	Because this topic has not been included in training plans	Because the level of risk of this activity has not been formally recognized as it is a task that is performed sporadically		
2. Environment	Exposure to deep pits without signage and unmarked electrical hazards	Because there are no visible signs warning of the risk	Because the company has not put up signs	Because it has not been prioritized as a critical risk within operational management		
3. Material/Raw Material						



	4. Method	There are no procedures for working on slopes or embankments, nor are there any procedures regulating the inspection and signaling of energized equipment.	Because no specific procedures have been developed for work on slopes or for electrical risk control of the STAR	Because the task is not considered routine and the STAR electrical installation has not been considered part of the critical system to be regulated.	Because there is no systematic approach to the hazards of slopes and electric motors in STAR facilities.		
	5. Machinery /Equipment	Electrical boxes are not labeled or marked with warnings despite being energized	Because they have not been inspected using preventive safety criteria	Because only corrective maintenance is performed	Because there is no structured electrical maintenance plan for that area		
	6. Measurement	The risk assessment does not consider the actual hazards in the area	Because only a general assessment of the workstation was carried out	Because no checklist or guide was used to identify specific hazards	Because the preparation was delegated without technical support and without subsequent review of the final document		
<b>Correction(s)</b>	<b>Inconsistency in the risk matrix</b>						



	<p>1. Train extractara personnel in the methodology for preparing the risk matrix, based on the procedure for identifying, assessing, inspecting, and reporting occupational risks with code UN-CH-PO-05, using an instructor accredited by the Ministry of Labor, to ensure that all real hazards and risks in the company are identified.</p> <p>2. Update the risk matrix based on company procedures, considering hazard identification, risk assessment, and risk control plans.</p> <p><b>Lack of safety measures in STAR tasks and safety labeling on engines and lagoons</b></p> <p>1. Temporarily suspend cleaning activities on slopes until controls are implemented</p> <p>2. Place temporary signage warning of drowning and depth hazards in visible locations</p> <p>3. Hold an informational meeting with workers about the hazards in the area</p> <p>4. Place temporary signs indicating voltage and risk warnings on all electrical boxes in the STAR area.</p> <p>5. Give a talk to STAR staff on electrical hazards and basic preventive labeling standards</p>																																
<p><b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i></p>	<p><b>Inconsistency in the risk matrix</b></p> <table border="1" data-bbox="685 788 2004 1324"> <thead> <tr> <th colspan="6">Action Plan (Implement actions)</th> </tr> <tr> <th rowspan="2">Start Date</th> <th rowspan="2">Action</th> <th rowspan="2">End date</th> <th colspan="2">Names of those responsible</th> <th rowspan="2">% progress</th> </tr> <tr> <th>To do</th> <th>Verify</th> </tr> </thead> <tbody> <tr> <td>7/1/2025</td> <td>Conduct joint review of risk matrix updates</td> <td>8/15/2025</td> <td>Cayley Putchie Area Managers</td> <td>Franko Guzman Alfredo Rivas</td> <td></td> </tr> <tr> <td>8/18/2025</td> <td>Communication of risk matrix to staff</td> <td>8/22/2025</td> <td>Area Managers</td> <td>Alfredo Rivas</td> <td></td> </tr> <tr> <td>8/25/2025</td> <td>Establish an annual internal review mechanism for the risk matrix</td> <td>8/27/2025</td> <td>Cayley Putchie</td> <td>Franko Guzman</td> <td></td> </tr> </tbody> </table>	Action Plan (Implement actions)						Start Date	Action	End date	Names of those responsible		% progress	To do	Verify	7/1/2025	Conduct joint review of risk matrix updates	8/15/2025	Cayley Putchie Area Managers	Franko Guzman Alfredo Rivas		8/18/2025	Communication of risk matrix to staff	8/22/2025	Area Managers	Alfredo Rivas		8/25/2025	Establish an annual internal review mechanism for the risk matrix	8/27/2025	Cayley Putchie	Franko Guzman	
Action Plan (Implement actions)																																	
Start Date	Action	End date	Names of those responsible		% progress																												
			To do	Verify																													
7/1/2025	Conduct joint review of risk matrix updates	8/15/2025	Cayley Putchie Area Managers	Franko Guzman Alfredo Rivas																													
8/18/2025	Communication of risk matrix to staff	8/22/2025	Area Managers	Alfredo Rivas																													
8/25/2025	Establish an annual internal review mechanism for the risk matrix	8/27/2025	Cayley Putchie	Franko Guzman																													



<b>Lack of safety measures in STAR tasks and safety labeling on engines and lagoons</b>					
<b>Action Plan (Implement actions)</b>					
<b>Start date</b>	<b>Action</b>	<b>End date</b>	<b>Names of those responsible</b>		<b>% progress</b>
			<b>To do</b>	<b>Verify</b>	
07/01/2025	Update the risk assessment for the STAR area with the participation of the area manager, considering hazard identification, risk assessment, and the risk control plan.	8/15/2025	Cayley Putchie	Franko Guzman	
8/18/2025	Develop specific procedure for cleaning slopes	8/22/2025	Blanca Hernández	Alfredo Rivas	
8/22/2025	Socialization of the specific procedure for cleaning slopes and evaluating understanding of it (training and evaluation record)	8/27/2025	Blanca Hernández	Alfredo Rivas	
8/18/2025	Train staff on risks in the area and preventive measures.	8/22/2025	Cayley Putchie	Franko Guzman	
7/14/2025	Implement permanent signage for access to the area and hazards, as well as permanent labels on all STAR electrical boxes.	8/22/2025	Blanca Hernández	Alfredo Rivas	



	<table border="1"> <tr> <td>July 14, 2025</td> <td>Implement fall protection systems for slope cleaning work</td> <td>July 31, 2025</td> <td>Blanca Hernández</td> <td>Alfredo Rivas</td> <td></td> </tr> <tr> <td>June 23, 2025</td> <td>Include electrical systems (panels) in PROMAT preventive maintenance plans</td> <td>06/27/2025</td> <td>Leonardo Navarrete</td> <td>Alfredo Rivas</td> <td></td> </tr> <tr> <td>8/25/2025</td> <td>Review STAR's work within the SSO inspection plan, including the review of electrical signage in boxes.</td> <td>8/27/2025</td> <td>Cayley Putchie</td> <td>Franko Guzman</td> <td></td> </tr> </table>	July 14, 2025	Implement fall protection systems for slope cleaning work	July 31, 2025	Blanca Hernández	Alfredo Rivas		June 23, 2025	Include electrical systems (panels) in PROMAT preventive maintenance plans	06/27/2025	Leonardo Navarrete	Alfredo Rivas		8/25/2025	Review STAR's work within the SSO inspection plan, including the review of electrical signage in boxes.	8/27/2025	Cayley Putchie	Franko Guzman	
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<b>Date of Response</b>	18.07.2025																		
<b>Audit Team Conclusion</b> (including any evidence reviewed)	<p>The plan has been approved for implementation on 07/31/2025</p> <p>The company presents the following evidence for the closure of non-conformities:</p> <p><u>Risk Matrix</u></p> <p>*Certificates of training in occupational health and safety on the subject of hazard identification and occupational risk assessment, with a duration of 8 hours, given to three members of the company's health and safety team on 07/23-24/2025.</p> <p>In addition, the certificate for the assessment and preparation of the occupational risk map is presented, issued by the General Directorate of Occupational Health and Safety on 28-29/07/2025, with a duration of 16 hours.</p> <p>* Minutes of the joint review meeting of the updated Risk Assessment Matrix, held on 08/18/2025. During the meeting, topics such as the risk assessment POE, risk matrix review, mitigation actions, and risk communication were discussed. Eight responsible workers were present.</p> <p>* Updated risk matrix CD-CH-BD-04, 2025. The matrix clearly describes the area, activity, and number of workers involved, hazard, risk factor and effect, probability, severity, and risk estimation, and finally, preventive actions.</p> <p>* Several training records from the Cukra Development Corporation are presented, corresponding to sessions held between August 19 and 22, 2025. The training sessions, given by Francisca María Rocha Sánchez, focused on "Risk Communication" for personnel in the production, maintenance, and warehouse departments. The main objective of these 2-hour sessions was to socialize the updated risk matrix, addressing topics such as identified</p>																		



	<p>hazards, causes of accidents, control measures, and the correct use of Personal Protective Equipment (PPE). Each record ends with a list of the participants who attended the training, for a total of 104.</p> <p>* A schedule for updating the risk assessment for 2026 is presented. The purpose of this document is to plan and distribute the task of updating the assessments in the different areas of the company throughout 2026. It also includes a system for monitoring whether the plan is being implemented on time.</p> <p><u>Work at the STAR</u></p> <p>* Minutes of the meeting held on 8/2/2025 to review the actions related to the safety measures of the activities carried out at the STAR of the extraction plant. During the meeting, topics such as the lack of safety, the need to update the risks, and immediate actions were discussed. It was concluded that work would be suspended until the risks were updated.</p> <p>* Photographic evidence was recorded of signage in the lagoon area regarding the risks and depth of the lagoons. Similarly, high-voltage warning signs were posted on the electrical units.</p> <p>* Record of training conducted on 08/04/2025 is presented. This is safety training for the STAR area, focused on educating workers about the specific hazards of their environment—such as noise, dust, mechanical and biomechanical risks—and the control measures implemented. It details everything from engineering controls and work procedures to the mandatory use of personal protective equipment (PPE), concluding with a call for employee responsibility to actively report any unsafe conditions or acts.</p> <p>* The IARAAS 2025 Risk Matrix is presented, showing the risks associated with activities in the wastewater treatment system.</p> <p>* STAR IA-CH-IT-08 Slope Cleaning Instruction Document: This document is a formal and detailed work instruction that establishes the step-by-step procedure for clearing weeds from the slope of the wastewater treatment system (STAR). Its purpose is to standardize the task, specifying the mandatory personal protective equipment (PPE), the necessary tools (such as brush cutters and machetes), and the correct sequence of actions that workers must follow to perform the cleaning in a safe, efficient, and controlled manner.</p> <p>* Record of the dissemination of the above instructions on 08/09/2025 with the participation of 11 workers. This record corresponds to the material from a training session or safety talk used to communicate and explain the slope cleaning procedure to staff. Unlike the formal instruction, this presentation focuses on "socializing" the content, ensuring that workers understand the specific risks of the task, the importance of safety measures, and the correct use of PPE.</p> <p>* Record of risk communication to STAR personnel. This document is a general safety communication addressed to all personnel working in the STAR area. Its purpose is to inform about the set of hazards and risks present throughout the area of operations, not just in a specific task. It details the different types of hazards identified (physical, chemical, biological, mechanical, etc.) and establishes general control measures and PPE that are</p>
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	<p>mandatory to prevent accidents and ensure a safe working environment for everyone in the wastewater treatment system.</p> <p>* Maintenance log for electrical panels in the lagoons. This document is a task-specific risk analysis (IARAAS) for the maintenance of electrical panels in the wastewater treatment system (STAR) lagoon. Its purpose is to systematically identify and evaluate the hazards associated with this high-risk activity, such as contact with electrical energy (electrocution), exposure to toxic gases, and the risk of falling into the water. The analysis details the mandatory preventive controls, which include de-energizing the equipment, using specialized personal protective equipment (such as dielectric gloves and face protection), and the need for constant supervision to ensure that maintenance is performed safely. Date: 08/13/2025.</p> <p>* Internal Occupational Health and Safety Audit Report Record. This report focuses on verifying compliance with safety procedures during slope cleaning and the general conditions of the STAR area. The purpose of the document is to assess whether workers follow established safe practices, use their personal protective equipment correctly, and whether workplace conditions comply with regulations. Through observations and photographs, the report documents both compliance and findings or "non-conformities" (deviations from the standard), serving as a control and continuous improvement tool for safety management in that specific area. Date: 08/29/2025. With an acceptance rate of 97%.</p> <p>The evidence is accepted and the non-conformity is closed on 04/11/2025</p>
<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
<b>Date of Closure:</b>	04.11.2025

<b>Indicator Number</b>	3.6.2(C)
<b>Nonconformity Number</b>	5
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>          The effectiveness of the Health and Safety Plan in addressing health and safety risks to individuals is not monitored.</p> <p><b>- Extraction Plant</b>          It was found that the company has a document entitled "<i>Indicators Plan SYSO IARAAS S.A. 2024</i>," which defines the activities for monitoring the occupational health and safety plan. However, during the document review, ten scheduled activities were identified that are not in compliance, with no evidence of documented follow-up associated with the non-compliance of these actions. Among the activities with the lowest percentage of execution are:</p> <ul style="list-style-type: none"> <li>- Worker health monitoring plan: 20% execution</li> <li>- Special risk reduction plan: 29% execution</li> <li>- SYSO management reports: Implementation 33%</li> <li>- Monitoring of compliance with the occupational health and safety plan (audit plan): 35% implementation</li> <li>- Unsafe conditions plan: Implementation 53%</li> </ul>	



For the year 2025, the company has defined the document "*Occupational Health and Safety Work Plan 2025*," code IA-CH-PG-01. However, there is no evidence of follow-up on actions pending implementation until May 2025, such as the inclusion of actions derived from the occupational risk assessment, scheduled for May 2025, and the execution of OHS audits carried out in February 2025.

Additionally, the records submitted for internal audits conducted during 2024 and 2025 do not include evidence of follow-up on identified safety conditions that remain open.

**- Cukra Development Corporation (CDC) Plantations**

There are deficiencies in the monitoring of the effectiveness of the occupational safety plan with respect to brush cutting with brush cutters. Risk Assessment UN-CH-BD-04, dated 01/18/2024, identifies the risk of noise exposure, indicating the use of earplugs as personal protective equipment (PPE), without mentioning the use of earmuffs.

However, in the SySO Internal Audit Form CD-SG-FO-14-30, corresponding to mechanized maintenance (brush cutter) and carried out on 02/28/2025, section 13 specifically evaluates the condition of *earmuffs*, without referring to earplugs.

During the field visit to the Palmas Adultas farm, lot 110 (opposite UMA 10), two operators were observed performing brush cutting work with a brush cutter; one of them was wearing earmuffs with hearing protection and the other was wearing pre-molded earplugs. In conversation with the occupational safety team, it was indicated that workers must use *earmuffs with hearing protection* as PPE, since they are included with the brush cutter at the time of purchase. *Earplugs* should only be used in emergency situations, when earmuffs are not immediately available. However, these guidelines are not reflected in the risk assessment or in the verification forms used.

There is no evidence of the availability of instructions to guide workers on the safe use, cleaning, maintenance, and quality of *earplugs*, which are used for prolonged periods. This type of device requires specific fitting techniques to ensure its effectiveness, as well as adequate hygienic conditions, which are not documented or controlled in the management system.

- In an interview with three agricultural workers harvesting coyol on the "Los Almendros" farm, it was reported that they live in the Alianza dos community and that, although the working day starts at 5:30 a.m., they have to walk to the company from their homes for an hour and a half, starting their journey at 3:30 a.m. using a flashlight because it is still dark at that hour. At the end of the workday, they make the same journey on foot. There is no evidence that measures have been implemented to manage the risks associated with the journey to their workplace.

**Evidence:**

**Extraction Plant**

- SYSO IARAAS S.A. 2024 Plan Indicators
- Occupational Health and Safety Work Plan 2025 Code IA-CH-PG-01
- Internal OHS audits carried out in 2024 and 2025



**CUKRA Evidence**

- Risk assessment UN-CH-BD-04,
- Results of the SySO internal audit CD-SG-FO-14-30 dated 2/28/2025
- Field visit to Palma Adulta farm, lot 110
- Interview with workers

**Root Cause Analysis**

**Monitoring and compliance with the SySO IARAAS plan**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	No meetings were held to monitor compliance with the OHS plan.	Because the manager did not call for or receive clear guidelines for formal follow-up	Because there is no procedure requiring regular meetings to review the plan	Because the follow-up to the SySO plan has not been formally supervised		
2. Environment						
3. Material/Raw Material						



	4. Method	No specific procedure for periodic monitoring of the plan	Because no protocol or instructions have been developed detailing how and when to monitor	Because it has been assumed that the schedule is a sufficient control tool	Because shared responsibilities and verification mechanisms were not defined		
	5. Machinery/ Equipment						
	6. Measurement	No follow-up is documented, nor is feedback provided on non-compliance	Because there is no alert system or cross-checking with indicators	Because monthly compliance verification is in the document but is not carried out	Because there is no direct supervision or review by immediate superiors		
<b>Deficiency in monitoring the SySO CDC Plan (EPP Guadaña)</b>							
<b>Analyze: What are the causes and why?</b>							
	<b>Category</b>	<b>Root cause</b>	<b>Why 1</b>	<b>Why 2</b>	<b>Why 3</b>	<b>Why 4</b>	<b>Why 5</b>
	1. Labor	Operators use ear muffs or	Because they are unclear	Because they did not receive	Because there is no single	Because the risk	



	earplugs interchangeably	about which PPE is mandatory	clear and up-to-date instructions	standard communicated or enforced in the field	assessment is not specific	
2. Environment	Prolonged use and hot conditions mean that some people prefer earplugs	Because earmuffs can be uncomfortable under certain conditions	Because ergonomic or comfort factors are not evaluated in the use of PPE	Because there are no guidelines for evaluating the suitability of PPE according to the environment		
3. Material/Raw Material						
4. Method	Risk assessment indicates "plugs," while the audit form evaluates "earmuffs."	Because they were done independently and were not compared	Because the cross-checking mechanism was not applied correctly	Because the person in charge assessed compliance with the POE using PPE, regardless of whether it was ear muffs or earplugs		



5. Machinery/ Equipment						
6. Measurement	The scything work was evaluated by the quality department and not by the SySO department.	Because only the effectiveness of the procedure in the field was being verified, and the risks and PPE for personnel were not examined in depth.	Because there were no defined criteria for validating documentary and operational alignment	Because SySO failed to provide training to quality assessors		
<b>Risks of routes without access roads</b>						
<b>Analyze: What are the causes and why?</b>						
<b>Category</b>	<b>Fundamental cause</b>	<b>Why 1</b>	<b>Why 2</b>	<b>Why 3</b>	<b>Why 4</b>	
1. Labor	Workers walk for 1.5 hours from isolated areas, leaving their homes at 3:30 a.m.	Because there is no vehicle access	Because they live on remote farms with no access to transportation	Because the government has not built access roads to some communities where workers live		
2. Environment	They live in isolated rural	Because there are no access				



		areas without road infrastructure	roads connecting them to the main routes					
	3. Materials/Raw Materials	There are no housing alternatives closer to the workplace	Because workers own or have family homes in remote areas	Because workers do not want to live away from their homes				
	4. Method	The risk of walking to work has not been assessed or documented in the management system	Because they are considered risks of personnel transport in areas with access roads	Because the transport risk assessment does not consider these exceptions	Because this method of transportation was omitted from the risk assessment			
	5. Machinery/Equipment							
	6. Measurement	There is no quantification of the personnel who travel under these conditions.	Because the human capital area has not carried out the inventory to take action					
<b>Correction(s)</b>	<b>Monitoring and compliance with the SySO IARAAS plan</b> 1. Call an extraordinary meeting (Human Capital) to review compliance with the SSO 2025 plan							



	<p>2. Send minutes of the SySO Plan review meeting with topics discussed, agreements, and date agreed upon for the next review</p> <p>3. Update the schedule, including monthly internal review dates</p> <p>4. Designate persons responsible for each block of activities to reinforce shared monitoring</p> <p>5. Document the current status of compliance with a gap report</p> <p><b>Deficiency in monitoring the SySO CDC Plan (PPE Chapea Guadaña)</b></p> <p>1. Review the specific operating procedure and risk assessment by OHS to identify immediate adjustments</p> <p>2. Immediately inform all brush cutter operators that PPE ear protection is mandatory</p> <p><b>Risks of traveling without access roads</b></p> <p>1. Hold an awareness talk on the risks associated with traveling on foot and self-protection measures</p> <p>2. Identify workers who travel to areas without access routes</p>																										
<p><b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i></p>	<p><b>Monitoring and compliance with the SySO IARAAS plan</b></p> <table border="1" data-bbox="685 818 2004 1264"> <thead> <tr> <th colspan="6">Action Plan (Implement actions)</th> </tr> <tr> <th rowspan="2">Start Date</th> <th rowspan="2">Action</th> <th rowspan="2">End date</th> <th colspan="2">Names of those responsible</th> <th rowspan="2">% progress</th> </tr> <tr> <th>To do</th> <th>Verify</th> </tr> </thead> <tbody> <tr> <td>7/1/2025</td> <td>Implement monthly monitoring and verification of the OHS plan</td> <td>7/7/2025</td> <td>Cayley Putchie</td> <td>Franko Guzman</td> <td></td> </tr> <tr> <td>7/1/2025</td> <td>Include review of work plan as a fixed item on OHS meeting agendas</td> <td>7/5/2025</td> <td>Cayley Putchie</td> <td>Franko Guzman</td> <td></td> </tr> </tbody> </table>	Action Plan (Implement actions)						Start Date	Action	End date	Names of those responsible		% progress	To do	Verify	7/1/2025	Implement monthly monitoring and verification of the OHS plan	7/7/2025	Cayley Putchie	Franko Guzman		7/1/2025	Include review of work plan as a fixed item on OHS meeting agendas	7/5/2025	Cayley Putchie	Franko Guzman	
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	7/1/2025	Establish a monthly execution control format with those responsible for each activity	8/7/2025	Cayley Putchie	Franko Guzman	
	8/4/2025	Train the OHS manager in strategic planning or related topics	8/8/2025	Cayley Putchie	Franko Guzman	
	<b>Deficiency in monitoring the SySO CDC Plan (EPP Guadaña)</b>					
	<b>Action Plan (Implement actions)</b>					
	Start Date	Action	End Date	Names of those responsible		% progress
				To do	Verify	
	6/16/2025	Update the risk assessment for brush cutters, including that the appropriate PPE is ear protection.	6/20/2025	Cayley Putchie	Franko Guzman	
	6/23/2025	Update and implement the Chapia POE with Motoguadaña, including: a) Mandatory use of ear protection c) Guidelines for the use and care of ear protectors	7/11/2025	Darwin López	Néstor Romero	
	6/23/2025	Update and align the audit form (CD-SG-FO-14-30) with the corrected risk assessment	6/28/2025	Cayley Putchie	Franko Guzman	



7/28/2025	Train supervisors and brush cutter operators on the proper use of ear muffs as hearing protection	7/30/2025	Cayley Putchie	Franko Guzman	
7/16/2025	Submit the audit log using form CD-SG-FO-14-30, showing the implementation of the changes made.	8/15/2025	Cayley Putchie	Franko Guzman	
<b>Risks of traveling without access roads</b>					
<b>Action Plan (Implementing actions)</b>					
Start date	Action	End date	Names of those responsible		% progress
			To do	Verify	
6/16/2025	Include the risk of rural pedestrian displacement in occupational risk assessment	7/14/2025 5	Cayley Putchie	Franko Guzman	
6/17/2025	Monitor through surveys or records how many workers per crew have this condition.	7/20/2025 5	Milton Pérez Yersson Chavez Darwin Lopez José López Leonidas Aragon	Leonidas Blandón Néstor Romero	



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<b>Date of Response</b>	18.07.2025												
<b>Audit Team Conclusion</b> (including any evidence reviewed)	<p>The plan has been approved for implementation on 07/31/2025</p> <p>The company presents the following evidence for the closure of non-conformities</p> <p><b>CORRECTIONS</b></p> <p>* Monitoring and compliance with the SySO IARAAS plan</p> <ul style="list-style-type: none"> <li>- The annual Occupational Health and Safety (OHS) work plan for the RAAS Oil Industry for 2025 is presented. Its main objective is to manage OHS activities to reduce accidents and occupational diseases, setting a compliance target of 80% of the scheduled activities. The plan details hundreds of tasks divided into programs such as "Legal Compliance," "OSH Training," and "Industrial Hygiene," assigning responsible parties and a monthly schedule. A follow-up report at the end of the file indicates that "82% of the period has been completed," showing that, as of the date of the report, the goal was being exceeded.</li> <li>- Meeting minutes are presented, documenting a meeting held on August 1, 2025, convened by Franco Guzman and attended by Cayley Putchie and Francisca Rocha, to review and organize the OHS plan. The main agreements, all marked as "Done," included designing the schedule of activities, coordinating "Strategic Planning" training, and establishing a monthly review of plan compliance. The next meeting was set for August 30, 2025.</li> <li>- Another meeting minutes record is presented, corresponding to the follow-up meeting on September 1, 2025, again with Franco Guzman, Cayley Putchie, and Francisca Rocha, focused on reviewing compliance with the SSO plan, specifically the results for August. Key agreements included the generation of biweekly progress</li> </ul>												



	<p>reports, the presentation of monthly progress reports with evidence to "CH," and the obligation to safeguard such evidence in physical and digital form. The next follow-up meeting was scheduled for September 30, 2025.</p> <ul style="list-style-type: none"> <li>- Two certificates issued by INATEC (National Technical and Technological Institute) of Nicaragua are presented, certifying that Francisca María Rocha Sánchez and Cayley Kirkland Putschie Mendoza participated in and completed the "Strategic Planning Course." Both certificates indicate that the course lasted 8 hours and was taught on August 16, 2025, serving as evidence of the execution of this activity, which was assigned at the August 1 meeting and recorded in the SSO plan.</li> </ul> <p>* Deficiency in monitoring the SySO CDC Plan (EPP Chapea Guadaña)</p> <ul style="list-style-type: none"> <li>- Update of the brush cutter cleaning procedure in oil palm CD-SA-PO-04; this operating procedure establishes the detailed methodology for cleaning, specifically weeding and re-weeding, in oil palm crops using a brush cutter. The procedure defines the scope of the task, the mandatory personal protective equipment (PPE) (such as face shield, helmet, gloves, shin guards, and earplugs), and the specific responsibilities of both the supervisor and the worker. It describes critical steps such as pre-inspection of the area to identify hazards (e.g., snakes, holes), preparation of the fuel mixture, correct operating technique, and safe refueling method. Finally, the document identifies the hazards and risks associated with the task (physical, chemical, biomechanical, biological), environmental aspects, a list of prohibitions (such as operating without PPE or smoking during refueling), and a contingency plan for emergencies such as spills, fires, or personal accidents.</li> <li>- A training record dated 08/11/2025 is presented, announcing the "SSO Communiqué" that warns of the health risk posed by high noise levels generated during brush cutter operation. It reports that exposure to this noise can cause irreversible hearing damage to workers, such as noise-induced hearing loss. Therefore, the communiqué establishes as a mandatory control measure <u>the essential use of ear muffs</u> throughout the entire workday or operation of the equipment. This guideline is intended for all operators, supervisors, and the OHS team to prevent occupational illnesses.</li> </ul> <p>* Risks of traveling without access roads</p> <ul style="list-style-type: none"> <li>- Training record dated 08/12/2025, which highlights the risk of traveling on foot through pastures to and from work. Topics such as hazards along the route, use of flashlights for travel, risks, self-protection measures, and controls implemented were discussed. Nineteen workers participated in these talks.</li> <li>- A matrix of the local personnel database who travel on foot through pastures is presented. A total of 19 workers from the Alianza, Almendro, ASD, and Block III farms are identified.</li> </ul> <p><b>CORRECTIVE ACTION</b></p> <ul style="list-style-type: none"> <li>* Monitoring and compliance with the SySO IARAAS plan</li> </ul>
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	<ul style="list-style-type: none"> <li>- Presentation of the SSO IARAAS 2025 Plan: This document is the "RAAS 2025 Industrial Oil Health and Safety Work Plan," whose objective is to implement and maintain the SSO management system to reduce accidents and occupational diseases. The plan details hundreds of activities scheduled monthly under categories such as Legal Compliance, OHS Training, and Critical Risks, assigning responsible parties and recording the status of each activity (completed or not). The main goal is to achieve 80% compliance with the scheduled activities, and a summary at the end of the document indicates that "82% compliance has been achieved for the period," suggesting that the goal was being exceeded at the time of the report.</li> <li>- Document Review of the compliance status of the IARAAS OHS Plan: this is the minutes of the meeting on "Follow-up on compliance with the 2025 plan," convened by Franco Guzman and held on September 1, 2025 (interpreted from the date "1109/2025" and the date of the next meeting). The session focused on reviewing compliance with the SSO plan for the month of August. As a result, key tasks were assigned with a deadline of September 30, 2025, including the generation of biweekly progress reports by Francisca Rocha, the presentation of monthly progress reports with evidence to "CH" by Cayley Putchie, and the physical and digital storage of evidence by both.</li> <li>- Strategic Planning Certificate for OHS Manager and Inspector: This file contains two certificates issued by INATEC (National Technical and Technological Institute) of Nicaragua certifying that Francisca María Rocha Sánchez and Cayley Kirkland Putchie Mendoza participated in the "Strategic Planning Course." Both certificates confirm that the course lasted 8 hours and was held on August 16, 2025, serving as evidence of the implementation of this training, which was scheduled in the OHS plan.</li> </ul> <p>* Deficiency in monitoring the SySO CDC Plan (PPE Scythe)</p> <ul style="list-style-type: none"> <li>- The CDC Occupational Risk Matrix is presented: This document is the "CDC Occupational Risk Matrix," which identifies and evaluates hazards by process. For the activity "Use of brush cutters" in the "Mechanized Maintenance" process, it identifies "Noise" as a physical hazard with consequences of "Hearing loss." The risk is classified as "Significant" and the use of "Earmuffs" is established as the required PPE, in addition to the control measure "Mandatory use of PPE."</li> <li>- An "EPP Delivery Form" dated June 17, 2024, is presented, which records the "Delivery of Earmuffs." The form lists eleven employees with the job title "Brushcutter Operator," who signed to confirm receipt of the hearing protection equipment.</li> <li>- Emails defining earmuffs as PPE for brush cutters are provided: This is an email dated July 19, 2024, sent by Franco Guzman to Cayley Putchie and Francisca Rocha, with the subject line "Definition of PPE for Brush Cutters." Based on the risk matrix, the email confirms the delivery of earmuffs to 11 operators and formally states that "The use of earmuffs is defined as essential PPE for all brush cutter operators." It also requests that Francisca Rocha update the "Cleaning Procedure" to include this requirement.</li> </ul>
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	<ul style="list-style-type: none"> <li>- A blank template document (CD-CH-RE-27) is presented for the "Mechanized Maintenance OHS Audit" focused on the "Use of Brush Cutters." It is a checklist designed for an auditor to review equipment conditions and worker compliance, explicitly including "Use of PPE (Face shield, earmuffs, shin guards, gloves)" and "Condition of PPE." The template also includes sections to record "Findings" (Observations) and necessary "Corrective Action."</li> <li>- Mechanical Maintenance OHS Audit Presented: This is a "Mechanical Maintenance OHS Audit" form completed by auditor Cayley Putchie on October 14, 2024, on operator Jairo Antonio Cuadra. The audit reported a critical non-compliance, marking "No" on the use of PPE. The "Findings" specify: "Operator does not wear earmuffs" and "PPE is in poor condition (Earmuffs)". As "Corrective Action", a "Verbal warning", a "Re-induction on PPE use" and the "Purchase of PPE" were recorded.</li> <li>* Risks of traveling without access roads</li> <li>- CDC occupational risk matrix: This document is the "CDC occupational risk matrix," which identifies hazards by process. For the activity "Walking through pastures" within the "Harvesting" process, it identifies "Safety conditions" such as uneven terrain and poor visibility as hazards. These conditions carry a "Significant" risk of "Falls at Level," "Blows," "Sprains," and "Fractures." The control measures established in the matrix to mitigate this risk are "Ensure Access Routes" and "Inspection of Access Routes."</li> <li>- Database of personnel traveling through pastures: This file, entitled "Database of people traveling on foot through pastures," is a tracking log for January 2025. It records multiple incidents in which workers with the job title "Applicator" were observed traveling on foot through the "Pastures" area, typically in the early morning hours (e.g., 5:20 a.m.). For each observation, the control action recorded was "Report to Supervisor," and all entries are listed as "Closed."</li> <li>- Flashlight delivery record: This document is a "PPE Delivery Form" dated August 29, 2025, which shows the "Delivery of Flashlights" to ten employees, including Jairo Antonio Cuadra and Jose Benito Espinoza. The "Comments" column justifies the delivery by stating: "Delivery of flashlights to reduce the risk of travel in the early morning," thus addressing the risk of poor visibility identified in the risk matrix.</li> <li>- Photograph of flashlight delivery: This PowerPoint presentation, titled "DELIVERY OF FLASHLIGHTS" and dated "THURSDAY, AUGUST 29, 2025," serves as visual evidence of the action recorded in the delivery form. It contains a single photograph showing a group of workers holding the flashlights they have just received, apparently during a talk or the formal delivery of the equipment.</li> <li>- OHS Harvest Audit 08-29-2025: This is the form for an "OHS Harvest Audit" conducted by auditor Cayley Putchie on worker Jairo Antonio Cuadra on August 29, 2025. The audit identified a key non-compliance, marking "No" on the item "Moves via access route." The specific finding was "Personnel move through pastures," which resulted in a "Verbal warning" and "Procedure re-induction" as immediate corrective actions.</li> </ul> <p>The evidence presented is accepted and the nonconformity is closed on 04.11.2025</p>
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<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
<b>Date of Closure:</b>	04.11.2025

<b>Indicator Number</b>	3.8.7(C)
<b>Nonconformity Number</b>	7
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> (when more than one site/member): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>          There is evidence that the company is entering conventional fruit as certified through a receipt "Fruit entry ticket, CD-TF-RE-10" delivered upon entry of the fruit into the extraction plant, as observed in the traceability exercise, although the oil is sold entirely as conventional.          Additionally, there are several physical reports that reference RSPO fruit handling, although the digital reports are handled as conventional:          - Fruit and almond inventory forms: Refers to sterilized carts, raw carts, vertical sterilizers 1 and 2, and crates with the RSPO reference completed for the months of March, April, and May 2025.          - Daily production summary, IA-PC-FO-25-01 act 12/12/24: Refers to sections of RSPO-certified fruit and almonds for 05/30/25, 04/03/25, and 03/27/25.</p>	
<p><b>Evidence:</b>          - Fruit receipt slip, CD-TF-RE-10          - Palm oil and almond inventory movement 2025          - Daily production report 2025</p>	



Root Cause Analysis	Analyze: What are the causes and why?						
	Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor							
2. Environment							
3. Material/Raw Material							
4. Method		Marking the FFB/RSPO box for conventional fruit	Because staff were being trained through practical, real-life exercises in separating certified and conventional fruit	Because at the time of the audit, knowledge and mastery of the future handling of certified and conventional fruit had to be demonstrated	Because this is the way to ensure that, once certified, the fruit, PK, and oil can be traced according to category (certified or conventional)	Because it is necessary to maintain the integrity and traceability required by the IP and conventional model	Because the aim is to market IP and conventional palm oil, demonstrating traceability from the moment it enters the RFF
5. Machinery/Equipment							



	<table border="1"> <tr> <td data-bbox="636 282 1043 365"></td> <td data-bbox="1043 282 1220 365"></td> <td data-bbox="1220 282 1384 365"></td> <td data-bbox="1384 282 1547 365"></td> <td data-bbox="1547 282 1722 365"></td> <td data-bbox="1722 282 1886 365"></td> <td data-bbox="1886 282 2018 365"></td> </tr> <tr> <td data-bbox="636 365 1043 512">6. Measurement</td> <td data-bbox="1043 365 1220 512"></td> <td data-bbox="1220 365 1384 512"></td> <td data-bbox="1384 365 1547 512"></td> <td data-bbox="1547 365 1722 512"></td> <td data-bbox="1722 365 1886 512"></td> <td data-bbox="1886 365 2018 512"></td> </tr> </table>								6. Measurement																		
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<b>Correction(s)</b>	<p>1. We stopped checking the box that describes the fruit as RSPO; all fruit that comes in is conventional.  2. We stopped referring to RSPO fruit in physical reports (fruit and almond inventory form and daily production summary, IA-PC-FO-25-01).</p>																										
<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<table border="1"> <thead> <tr> <th colspan="6" data-bbox="685 651 2007 711">Action Plan (Implement actions)</th> </tr> <tr> <th data-bbox="685 711 824 831" rowspan="2">Start Date</th> <th data-bbox="824 711 1344 831" rowspan="2">Action</th> <th data-bbox="1344 711 1498 831" rowspan="2">End Date</th> <th colspan="2" data-bbox="1498 711 1904 759">Names of those responsible</th> <th data-bbox="1904 711 2007 831" rowspan="2">% progress</th> </tr> <tr> <th data-bbox="1498 759 1722 831">To do</th> <th data-bbox="1722 759 1904 831">Verify</th> </tr> </thead> <tbody> <tr> <td data-bbox="685 831 824 963">June 9, 2025</td> <td data-bbox="824 831 1344 963">On the fruit receipt form and other reports, do not categorize fruit and oil as certified; everything is handled as conventional.</td> <td data-bbox="1344 831 1498 963">Permanent</td> <td data-bbox="1498 831 1722 963">Supply Chain Manager</td> <td data-bbox="1722 831 1904 963">Extraction Manager</td> <td data-bbox="1904 831 2007 963"></td> </tr> <tr> <td data-bbox="685 963 824 1102">9/6/2025</td> <td data-bbox="824 963 1344 1102">Continue training staff in fruit and oil traceability, without crossing out the "certified" category, until the RSPO issues the certificate.</td> <td data-bbox="1344 963 1498 1102">Ongoing</td> <td data-bbox="1498 963 1722 1102">Supply Chain Manager</td> <td data-bbox="1722 963 1904 1102">Extraction Manager</td> <td data-bbox="1904 963 2007 1102"></td> </tr> </tbody> </table>	Action Plan (Implement actions)						Start Date	Action	End Date	Names of those responsible		% progress	To do	Verify	June 9, 2025	On the fruit receipt form and other reports, do not categorize fruit and oil as certified; everything is handled as conventional.	Permanent	Supply Chain Manager	Extraction Manager		9/6/2025	Continue training staff in fruit and oil traceability, without crossing out the "certified" category, until the RSPO issues the certificate.	Ongoing	Supply Chain Manager	Extraction Manager	
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<b>Date of Response</b>	27.06.2025																										
<b>Audit Team Conclusion</b> <i>(including any evidence reviewed)</i>	<p>The plan was approved on 07/03/2025.</p> <p>The company presents the following evidence for the closure of non-conformities:  * Photographic record of fruit transport tickets that are now selected as conventional fruit for several entry records for the months of July and August 2025.</p>																										



	<p>* Fruit and kernel inventory form for several days in July and August 2025, confirming that the fruit received is conventional.</p> <p>* Evidence of daily production reports showing that only conventional fruit is processed.</p> <p>* Record of training conducted on 07/04/2025 confirming the proper use of the fruit entry slip, production report, and production inventory where the fruit that is entered and processed is conventional. The document specifies that, as of this date, the certificate category cannot be marked on any document until the RSPO certificate is issued. Ten workers responsible for completing this information attended this training.</p> <p>The evidence is accepted and the non-conformity is closed on 04.11.2025.</p>
<p><b>Status of Nonconformity</b></p>	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Open</p>
<p><b>Date of Closure:</b></p>	<p>04.11.2025</p>

<b>Indicator Number</b>	3.8.9(C)
<b>Nonconformity Number</b>	8
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>          There are inconsistencies in compliance with the requirements for subcontracted activities.</p> <p>During the document review, it was found that, although the company has the <i>Procedure for the production of RSPO-certified oil – Dual Process, IA-PC-PO-16-01</i>, updated on 02/20/2025, which establishes in section 10 the subcontracting of activities related to the transport of crude palm oil and palm kernel oil (ACP-PK), as well as the storage of crude palm oil (ACP), linked to the latter, the <i>Procedure for the reception, storage, and dispatch in Puerto Corinto, IA-AD-PO-16-06</i>, there is no evidence to show that these procedures have been communicated to the contractors involved.</p> <p>Additionally, the lease agreement for tanks #6 and #9 in Puerto Corinto, designated for the storage of IP-certified oil, establishes in its fourth clause that <b>"THE CONTRACTOR is not responsible for missing products or losses, differences in weight, or losses caused by differences in scales and measurements on land or ship; the same applies to "Demurrage" (Delay) relating to the ship, due to congestion at the dock or equipment malfunctions or other factors.</b></p>	



**THE CONTRACTOR** is unaware of the behavior of the product stored in the tank and is therefore not responsible for changes in temperature or contamination that occur during storage."

Finally, as the certification body was not notified in a timely manner of the location of the subcontracted tanks used for the storage of IP oil, no visit was made to Puerto Corinto to verify the implementation of the aforementioned procedures or the conditions of preservation and handling of the product, which prevents evidence of compliance with the corresponding indicator.

**Evidence:**

- Procedure for the production of RSPO-certified oil – Dual Process, IA-PC-PO-16-01
- Procedure for reception, storage, and dispatch in Puerto Corinto, IA-AD-PO-16-06
- Service contract between Industrial Aceitera de la RAAS and Nicaragua Sugar Estates Limited: Oil storage tanks signed on 01/01/2025 with a term of 1 year.

**Root Cause Analysis**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	Absence of contractual guarantees regarding the integrity of the stored product, which represents a critical risk for the traceability, quality, and certification of IP oil	Staff without specific training in technical storage clauses for certified products	Because contractual processes are not standardized for critical operations related to product integrity	Because there is no criticality matrix for certification support contracts		
2. Environment						



	3. Material/Raw Material	IP-certified oil would be exposed to possible losses, contamination, or alterations without liability	Because the supplier does not guarantee the integrity of the product	Because it is not required by the contractual agreement	Because this specific product requirement was not considered	
	4. Method	There is no evidence of these procedures being communicated to contractors involved in the transport and storage of crude palm oil.	Because there is no formal mechanism established in the procedures to ensure effective communication to subcontracted third parties.	Because at the time of their development, priority was given to internal processes rather than operational management with external suppliers.	Because the time for dissemination was short and there are not many staff assigned to this task.	Because work is based on existing human capital, which is sufficient as long as the dissemination begins with good schedule
	5. Machinery/Equipment	Storage tanks owned by a third party are used, operated by the supplier, without the contracting company having control or guarantees over the integrity of the oil	Because the lease agreement does not establish provisions that grant the contracting company powers of supervision, inspection, or control over the operating conditions of the tanks	Because the operational and product integrity requirements associated with the use of these tanks were not considered during the negotiation and contract formalization phase	Because the requirement to preserve the quality and integrity of the palm oil was not identified during the review and validation process of the contract with the supplier	Because contracting processes have traditionally not been aligned with the quality, traceability, and safety requirements of palm oil



	<table border="1"> <tr> <td data-bbox="685 298 853 434">6. Measurement</td> <td data-bbox="853 298 1090 434"></td> <td data-bbox="1090 298 1339 434"></td> <td data-bbox="1339 298 1570 434"></td> <td data-bbox="1570 298 1798 434"></td> <td data-bbox="1798 298 2020 434"></td> </tr> </table>	6. Measurement																												
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<b>Correction(s)</b>	<p>1. Share with the staff involved the procedure for the production of RSPO-certified oil – dual process, IA-PC-PO-16-01, and the procedure for reception, storage, and dispatch in Puerto Corinto, IA-AD-PO-16-06.</p> <p>2. Begin review of contract with Nicaragua Sugar, supplier of CPO storage tanks, for clause four on special stipulations</p>																													
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<b>Date of Response</b>	27.06.2025																								
<b>Audit Team Conclusion</b> (including any evidence reviewed)	<p>The plan was approved on 07/03/2025. Please consider the comments for effective closure.</p> <p>The company presents the following evidence for the closure of the identified non-conformities:</p>																								



	<p>* Records of socialization with the transport contractor are presented. The main topic in all sessions was the "Socialization of the procedure for the production of RSPO-certified oil—dual process IA-PC-PO-16-01 and the procedure for reception, storage, and dispatch at the IARAAS terminal in Puerto Corinto IA-AD-PO-16.06." The overall objective was to ensure that staff understood the steps to be followed under the IP (Identity Preserved) certification model.</p> <p>Key concepts covered included:</p> <ul style="list-style-type: none"> <li>• RSPO (Roundtable on Sustainable Palm Oil) concepts.</li> <li>• The Identity Preserved (IP) supply chain model.</li> <li>• Specific procedures for products extracted at IARAAS and their destination.</li> <li>• Distribution and use of tanks at the terminal.</li> </ul> <p>The training was delivered by Mario Muñoz and used a face-to-face methodology that included PowerPoint presentations, oral narration, and videos. The evaluation consisted of a written test and direct questions.</p> <p>Details by Date</p> <p>August 4, 2025</p> <ul style="list-style-type: none"> <li>• Location: IARAAS extraction facility.</li> <li>• Time: 7:00 a.m. - 8:00 a.m.</li> <li>• Attendees: 12 people attended.</li> <li>• Grades: The grades obtained in the evaluation were mostly 100 points, with some 90 points. All participants passed with a grade higher than the minimum required of 70 points.</li> </ul> <p>August 5, 2025</p> <ul style="list-style-type: none"> <li>• Location: IARAAS Extractor.</li> <li>• Time: 7:00 a.m. - 8:00 a.m.</li> <li>• Attendees: Twelve participants were registered.</li> <li>• Grades: Assessment scores varied, including grades of 80, 90, and 100 points. All attendees exceeded the minimum score of 70.</li> </ul> <p>August 6, 2025</p> <ul style="list-style-type: none"> <li>• Location: JARAAS Extractor.</li> <li>• Time: 7:00 a.m. - 8:00 a.m.</li> <li>• Attendees: Nine people participated in the training.</li> <li>• Grades: Most attendees received a score of 100 points on the assessment, with a minimum score of 90. All passed satisfactorily.</li> </ul> <p>August 7, 2025</p> <ul style="list-style-type: none"> <li>• Location: IARAAS Extractor.</li> <li>• Time: 7:00 a.m. - 8:00 a.m.</li> </ul>
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- Attendees: Eight people attended this session.
- Grades: All participants received a score of 100 points on their evaluations, exceeding the minimum score of 70.

\* Additionally, on July 8, 2025, a one-hour training session was held at the IARAAS Corinto campus from 7:00 to 8:00 a.m. The session was led by Mario Muñoz, Engineer. The training focused on the "Socialization of the Procedure for the Production of RSPO-Certified Oil - Dual Process IA-PC-PO-16-01" and the "Procedure for Receipt, Storage, and Dispatch at the Terminal - IA RAAS of Puerto Corinto IA-AD-PO-16-06." Specific topics included:

- RSPO concepts - Supply chain model.
- Products extracted at IA-RAAS and their destination.
- Distribution and the Certification Manual.

A total of 12 people attended the training. The positions of the attendees included supervisors, operators, an electromechanic, the site manager, and security personnel.

The evaluation scores were as follows:

- 100 points: 4 people.
- 90 points: 5 people.
- 80 points: 1 person.
- "gopk" (presumably 90): 1 person.
- The score of one of the participants is not specified.

All participants evaluated obtained a score higher than the minimum required score of 70 points.

\* In an email exchange on July 11, 2025, Ileana Zamora Ocón of AGROSA sends the signed contracts for tanks 6 and 9 to Martín Vargas Barquero and Jose Uriel López Bermúdez of Cukra Development Corporation. Jose Uriel López Bermúdez confirms receipt and mentions that, once the date of the certifying body's visit to the Corinto facility has been set, he will request information from Nicaragua Sugar regarding the legal compliance of the personnel working in the leased tanks.

\* The service contract for tank No. 9, with a capacity of 1,871.86 cubic meters, is established between Industrial Aceitera de la RAAS, S.A. (THE CONTRACTOR) and Nicaragua Sugar Estates Limited (THE CONTRACTED PARTY). The contract is valid from January 1, 2025, to December 31, 2025. The monthly rental fee is six dollars per cubic meter plus VAT, and the handling fee for crude palm oil and fatty acids is five dollars per metric ton plus VAT. THE CONTRACTED PARTY agrees to allow staff training and access by the certifying body for the RSPO audit.



	<p>In clause FOUR: SPECIAL PROVISIONS, it is clearly established that THE CONTRACTING PARTY, that is, Industrial Aceitera de la RAAS, S.A., assumes all responsibility.</p> <p>Details of Responsibilities</p> <ul style="list-style-type: none"> <li>• Losses and Delays: THE CONTRACTING PARTY is responsible for any missing products, shrinkage, weight differences, and losses caused by discrepancies in scales or measurements between land and ship. This responsibility also covers ship demurrage due to dock congestion, equipment malfunction, or other factors.</li> <li>• Product Quality: THE CONTRACTING PARTY is responsible for the behavior of the product while it is in storage, including changes in temperature or any contamination that may occur.</li> </ul> <p>* In emails dated June 2025, Industrial Aceitera de la RAAS requests Nicaragua Sugar to modify clause four of the lease agreements for tanks 6 and 9. This request arises from the need to address non-conformities detected in an RSPO certification audit conducted in May. The goal is to make the changes within two months to comply with the audit requirements.</p> <p>* In a series of emails in July 2025, Jose Uriel López Bermúdez of Cukra-IARAAS and Laura Reyes of SCS Global Services coordinate an audit visit to the Corinto facility, for which a facilitator is being sought in Nicaragua. Cukra-IARAAS expresses its urgency in setting the dates for the visit and sending the NPP report to the RSPO in order to inform senior management.</p> <p>* The service contract for tank No. 6, with a capacity of 1,040 cubic meters, is agreed between Industrial Aceitera de la RAAS, S.A. (THE CONTRACTOR) and Nicaragua Sugar Estates Limited (THE CONTRACTED PARTY). The contract is valid from October 1, 2024, to September 30, 2025. The monthly lease cost is six dollars per cubic meter plus VAT, and the handling fee is five dollars per metric ton plus VAT. The contract stipulates that THE CONTRACTOR must allow staff training twice a year and access to the facilities by the RSPO certifying body.</p> <p>In clause FOUR: SPECIAL PROVISIONS, it is clearly established that THE CONTRACTING PARTY, that is, Industrial Aceitera de la RAAS, S.A., assumes all responsibility.</p> <p>Details of Responsibilities</p> <ul style="list-style-type: none"> <li>• Losses and Delays: THE CONTRACTING PARTY is responsible for any missing products, shrinkage, weight differences, and losses caused by discrepancies in scales or measurements between land and ship. This responsibility also covers ship demurrage due to dock congestion, equipment malfunction, or other factors.</li> <li>• Product Quality: THE CONTRACTING PARTY is responsible for the behavior of the product while it is in storage, including changes in temperature or any contamination that may occur.</li> </ul> <p>Results of a visit to Puerto Corinto on October 7, 2025, by a local facilitator for SCS Global Services, accompanied by the lead auditor</p>
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	<p>The opening meeting, led by the lead auditor from SGS Global, addressed the reasons for the visit, concerning the non-compliance in indicator 3.8.9., and my introduction as the local facilitator. The meeting began at 9:10 a.m., due to delays in the transfer from Managua to Puerto Corinto, and ended at 9:25 a.m. The list of participants is also included in the official participant list format provided by SCS Global.</p> <p><b>INSPECTION OF THE INDUSTRIAL ACEITERA DE LA RAAS FACILITIES:</b> During the visit, I was informed that IARAAS has three permanent employees assigned to the Corinto facility, who are responsible for reception, storage, and dispatch at the ACP site. These employees are listed below:</p> <ul style="list-style-type: none"> <li>- Operations Manager Sergio Castillo - Supervisor</li> <li>- Operator</li> </ul> <p>The visit consisted of observation and an explanatory tour of the Procedure for Receiving, Storing, and Dispatching at Puerto Corinto, IA-AD-PO-16-06. It should be noted that: It was clarified to those present that the explanations of the procedures carried out would be provided by the direct employees of the Corinto facility and not by the IARAAS representatives from Kukra, in order to confirm that the employees located in Puerto Corinto are familiar with the procedures.</p> <ul style="list-style-type: none"> <li>- It was expected that the explanations of the procedures would focus on the reception of IP-certified ACP, although at this time they are only receiving conventional ACP.</li> </ul> <p>Explanation of procedure and tour: The procedure was explained mainly by the supervisor, Sergio Castillo, with contributions from the other two IARAAS workers. * To receive the ACP, the tanker from Kukra-IARAAS reverses into a parking space in a safety area equipped with drains to contain spills.</p> <ul style="list-style-type: none"> <li>- The Corinto facility workers proceed to receive the ACP transport documentation carried by the tanker driver, which includes: invoice, load verification record, bill of lading, quality certificate, and dispatch order. It should be noted that the documentation includes driver details, product characteristics, specifications (whether RSPO or conventional), and a list of marks or seals on the tanker.</li> </ul> <ul style="list-style-type: none"> <li>• The workers at the Corinto facility also fill out a record called the Tank Unloading Inspection Report.</li> <li>• After ensuring that the documentation is complete and correct, they proceed to connect the hoses.</li> <li>• The valves are then opened to purge the pump with oil.</li> <li>• The oil is then transferred through the pipeline and discharged into the storage tank at the top.</li> <li>• When asked how they ensure product quality, they explained that all equipment and hoses used are exclusively for ACP.</li> <li>• José Uriel explained that the hoses and all IARAAS facilities at the Puerto Corinto Plant currently only receive conventional ACP, but will be used exclusively for APC RSPO IP in the future, once they receive certification. He explained that the hoses currently in use could be cleaned or replaced to be used with ACP RSPO.</li> </ul>
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- Similarly, Sergio Castillo explained that they will clean all the pipes and tanks. In the case of the pipes, this will be done with a PIG, which is inserted into the pipe and cleans it; in the case of the tank, it will be cleaned with steam.
- To dispatch the ACP from tank No. 1, the ACP is first heated using steam through coils. This heating is done by means of a bunker-fed boiler located in the private facilities of IARAAS. The boiler is turned on three days before the ACP is dispatched, depending on the arrival of the ship. The ACP must reach 55 degrees Celsius, and temperature gauges are installed to monitor the temperature in the tank.
- Once the ship's arrival is confirmed and the hoses have been installed on the dock for unloading, the ACP is dispatched. The installation of the hoses on dock No. 5 is the responsibility of the contractor.
- The ACP runs 2 km through underground piping to Pier No. 5. The piping is exclusive to IARAAS and it was explained that it has no interconnections with other pipes. Nor does it have any checkpoints along that route.
- During the explanation of the procedure, it was asked how questions about the procedure were clarified, and it was explained that they consult with the Supply Chain Manager at Kukra Hill or review the procedure. At the time, a physical copy was provided to keep in the office.
- During the explanation of the procedure at the facilities, they did not specify whether they take samples for product analysis. However, after the inspection, it was observed that José Uriel was given a stamped sample to be taken for analysis.

Observations at IARAAS facilities - Puerto Corinto Campus

- The hoses (4 inches) that connect to the cistern are located in a covered area and their ends are covered with plastic to prevent contamination. The hoses used for dispatching ACP at the dock, which are 8 inches, are also located here.

\* <sup>90</sup> The valves were observed to be in good condition, with no leaks, wear, or corrosion. <sup>91</sup> It was also observed that they have locks to prevent accidental opening. <sup>92</sup> Although their flows are not marked, since they only have one tank and their facilities are exclusive, there is no possibility of contamination or transfer due to the piping. <sup>93</sup>

- Upon visiting the tank, it was observed to be in good condition, with minor signs of corrosion on the roof due to rain. <sup>94</sup> The valves and connections to the tank are in good condition. <sup>95</sup>
- The pumps used to transfer the ACP from the cistern to the pipeline and from the ACP dispatch to the dock are in good condition. <sup>96</sup> Although the latter is not under cover, it is protected from exposure to rain. <sup>97</sup>
- The retaining wall in the tank area is approximately 1.3 meters high. <sup>98</sup> The estimated containment area is 40 x 40 m. The wall was observed to be in good condition, and the storm water drainage outlet has a control valve. <sup>99</sup>



	<ul style="list-style-type: none"> <li>In terms of cleanliness and tidiness, it was observed to be clean, in good condition, and organized, and even an area under construction had signage to prevent entry by outsiders. <sup>100</sup></li> </ul> <p>INSPECTION OF SUBCONTRACTED FACILITIES - TANK NO. 9 AND 6 OF NICARAGUA SUGAR ESTATE LIMITED <sup>101</sup> Nicaragua Sugar Estate Limited (NSEL-ISA) is the contractor for IARAAS, providing two storage tanks for ACP, as well as two permanent employees assigned specifically to IARAAS and a supervisor, who are responsible for receiving, storing, and dispatching at the ACP site for IARAAS. <sup>102</sup> These employees are listed below: <sup>103</sup> Julio José Delgadillo Chevez - Boiler Operator Luis Jarquín - Boiler Operator <sup>104</sup> Ulises Chavarría - Supervisor <sup>105</sup></p> <p>The Nicaragua Sugar Estate Limited tank facilities No. 9 and 6 are located 800 m from the IARAAS facilities - Puerto Corinto Plant. <sup>106</sup> The visit was conducted through observation and an explanatory tour of the Procedure for Receiving, Storing, and Dispatching in Puerto Corinto, IA-AD-PO-16-06. <sup>107</sup></p> <p>Explanation of procedure: <sup>108</sup> The procedure was explained mainly by Julio Delgadillo, an employee of Nicaragua Sugar Estate Limited, accompanied by IARAAS staff. <sup>109</sup></p> <ul style="list-style-type: none"> <li>When the tanker arrives at the NSEL facilities, IARAAS workers receive the corresponding documentation. <sup>110</sup> NSEL workers <sup>111</sup></li> <li>Currently, tanks No. 6 and No. 9 are used for conventional ACP by IARAAS, but once approved for ACP IP, both will be used exclusively for ACP IP. Similarly, the workers commented that the hoses are exclusively for IARAAS, and that each pipe is used for a specific tank, with no pipes being shared. The pump is also only for IARAAS, although at the same point, it was observed that there are pipes to connect tanks No. 8 and No. 10.</li> <li>NSEL workers explained that they are responsible for operating the pump to transfer the ACP to the tanks and for operating the boiler to heat the ACP to 55 degrees Celsius for shipment to the ship. The other activities are carried out by IARAAS workers for the tankers that arrive at tanks No. 6 and No. 9.</li> <li>To ship the ACP, they follow the same procedure as at IARAAS, turning on the boiler, in this case a diesel boiler, three days before shipment to heat the ACP with steam until it reaches 55 degrees Celsius.</li> <li>Once ready and approved for dispatch at the dock, they proceed to connect the hoses to the transfer pipe to the dock (black) and pump.</li> </ul> <p>Observations at tank facilities No. 9 and No. 6 - Nicaragua Sugar Estate Limited:</p> <ul style="list-style-type: none"> <li>The 6-inch hoses they use are connected to the existing pipes for each tank. They are located in a covered area and their ends are covered with plastic to prevent contamination.</li> <li>In the area where the pipes connect to the pump, several pipes can be seen, one of which is covered and corresponds to tank No. 6, according to the explanation, as it has no signage. One pipe with a hose installed and connected to the pump, which was said to be for tank No. 9, and two more pipes, not covered, which they say they do not use, corresponding to tanks No. 8 and 10. None of them are identified.</li> </ul>
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	<p>* The pipe for tank No. 9 is visible on the surface, being buried only when it crosses the street (since the facilities are divided into two: the pump on one side and the tank storage area on the other side of the street). However, when crossing the street and asking which of the two (white) pipes visible was the one for tank No. 9, they were unsure and said it was the one below, but with some doubt.</p> <ul style="list-style-type: none"> <li>• The pipe to tank No. 6 is completely underground. The pipes for tank No. 9, although looking somewhat old, showed no signs of leaks or corrosion.</li> <li>• The pipe used to transfer the CPO to the dock and ship for dispatch is black in color, with no identification other than the color. There are two pipes of this color, and they explained that the one above is IARAAS's. This is the only one that was covered with a metal cap to prevent internal contamination. The one below was uncovered.</li> </ul> <p>Tanks No. 9 and No. 6 are marked with the tank number, capacity, and dimensions. To identify the tank as containing crude palm oil, there is a very improvised acrylic sign.</p> <ul style="list-style-type: none"> <li>• The tanks visited are located in a containment area with three other tanks assigned to other oil companies.</li> <li>• The containment area has a perimeter wall approximately 3 m high, however, at 30 cm there are two holes from old pipes, which when removed, left it exposed. One of the holes is in the outer wall facing the street. The other hole connects to another section of tanks with a retaining wall. Puddles were also observed forming inside the containment area, although it was not explained whether this was a frequent occurrence.</li> <li>• Tanks No. 6 and No. 9 show some signs of corrosion on the valves. However, no leaks were observed. The valves on tank No. 9 also have marks, but those on tank No. 6 do not.</li> <li>• During this visit, the boiler was not seen at the NSEL facilities visited.</li> <li>• In terms of cleanliness and tidiness, it was observed to be clean, in good condition, and organized.</li> </ul> <p>INTERVIEW WITH WORKERS In accordance with SCS Global guidelines, the interviews with workers were conducted by the lead auditor, Weesmary Navarro, with me participating only in person as a local facilitator, facilitating the connection and participation of the workers. The interviews were conducted via Teams.</p> <p>Interview with IARAAS workers: The interviews were conducted with the three workers from IARAAS-Plantel Corinto, without the presence of the other IARAAS representatives: José Luis López Maradiaga - Operations Manager Sergio Castillo - Supervisor Kennet Snider Reyes Madriz - Operator The questions concerned their knowledge of non-compliance, critical points in their processes, knowledge of the procedure, training in this and other training and/or education, key points to avoid contamination, description of what IP is, procedures if a seal is damaged (hypothetical case), knowledge of the surveyor and their involvement in the processes in tanks No. 9 and No. 6. The confidentiality of their answers was also explained to them.</p> <p>Interview with NSEL workers - tanks No. 9 and No. 6:</p>
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	<p>The interviews were conducted with the two NSEL workers from tanks No. 9 and No. 6, without the presence of IARAAS representatives: Julio José Delgadillo Chevez - Boiler operator Luis Jarquín - Boiler operator The supervisor was unable to be present, as he was sent to other activities by NSEL. The questions concerned their knowledge of the ACP reception, storage, and dispatch procedure; training in this and other areas; description of what IP is; their involvement in the processes in tanks No. 9 and No. 6; and the participation of IARAAS workers in the procedure. The confidentiality of their answers was also explained to them.</p> <p>The closing meeting, led by lead auditor Weesmary Navarro of SGS Global, again addressed the issue of non-compliance in indicator 3.8.9, the findings during the visit, and interviews with workers. Some specific issues:</p> <ul style="list-style-type: none"> <li>• A comment was made about the identification on tanks No. 9 and No. 6, which is acrylic and will not last over time, so a more permanent solution is requested: <i>Photographic evidence is presented showing clearer labeling of the type of product contained in the tanks. Date 10/17/2025.</i></li> <li>• Guidance was provided on the identification of the pipe located in NSEL for tanks No. 9 and No. 6, as well as for the pipe leading to the ship, which were not identified and could be confused if the current workers were not there: <i>Photographic evidence is presented showing the pipes labeled in yellow paint for the black pipe and in black for the white pipe. Date: 10/17/2025.</i></li> <li>• It was recommended that the holes in the retaining walls of tanks No. 9 and No. 6 be repaired in the future so that they do not appear as non-conformities in safety issues in future audits: <i>photographic evidence is presented of the repair and closure of the holes that could pose a risk to the tanks leased from Nicaragua Sugar. Date: 10/17/2025.</i></li> </ul> <p>The evidence is accepted and the non-compliance is closed on 17.10.2025</p>
<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
<b>Date of Closure:</b>	17.10.2025

<b>Indicator Number</b>	6.2.2 (C)
<b>Nonconformity Number</b>	10
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>            The calculation support for the settlement of an individual employment contract sampled for voluntary resignation does not provide accurate information about the wages received in the last six months.            The calculation support for the settlement of the employment contract due to voluntary resignation for a worker in Specialized Tasks at Industrial Aceitera de la RAAS on 12/07/2024 is evident, in which, after review with Human Capital, it is concluded that it was correctly calculated and paid, although in the "last wages received" section, the wages reported for the last six months, which are the basis for calculating benefits, are not shown correctly.            In an interview with Human Resources, they indicated that this situation may be due to the implementation of a new program, but this change had not been identified.</p>	
<p><b>Evidence:</b>            - Interviews with Human Resources</p>	



- Calculation support for the settlement of the employment contract due to voluntary resignation for a worker in Specialized Tasks at Industrial Aceitera de la RAAS

Root Cause Analysis	Analyze: What are the causes and why?						
	Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The accounting and human resources staff did not verify that the support contained the last six correct salaries	Because it was assumed that the new system would provide correct information	Because it was assumed that the information in the system was accurate				
2. Environment							
3. Material/Raw Material	The receipt supporting the settlement calculation does not reflect salaries correctly	Because the requirement was not taken into account in the implementation of the new payment system.	Because only the calculated average result appears, but not the details accrued for each month.				
4. Method							



	5. Machinery/ Equipment																																
	6. Measurement	The omission of information on the settlement calculation had not been detected	Because the final result is correct and the review focuses on what the worker has received.																														
<b>Correction(s)</b>	<ol style="list-style-type: none"> <li>1. Instruct accounting staff to manually verify the last six salaries while the system is being corrected.</li> <li>2. Inform the system provider of the inconsistency detected for immediate adjustment.</li> <li>3. Record all errors detected in a simple format shared between CH and accounting.</li> </ol>																																
<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<table border="1"> <thead> <tr> <th colspan="6">Action Plan (Implement actions)</th> </tr> <tr> <th rowspan="2">Start Date</th> <th rowspan="2">Action</th> <th rowspan="2">End Date</th> <th colspan="2">Names of those responsible</th> <th rowspan="2">% progresses</th> </tr> <tr> <th>To do</th> <th>Verify</th> </tr> </thead> <tbody> <tr> <td>7/1/2025</td> <td>Prepare instructions for validating settlements</td> <td>7/15/2025</td> <td>Franko Guzman</td> <td>Martín Vargas</td> <td></td> </tr> <tr> <td>7/1/2025</td> <td>Request technical support from the provider to correct the salary module (payroll) and have a format with details of the last six salaries.</td> <td>7/15/2025</td> <td>Franko Guzman</td> <td>Martín Vargas</td> <td></td> </tr> </tbody> </table>							Action Plan (Implement actions)						Start Date	Action	End Date	Names of those responsible		% progresses	To do	Verify	7/1/2025	Prepare instructions for validating settlements	7/15/2025	Franko Guzman	Martín Vargas		7/1/2025	Request technical support from the provider to correct the salary module (payroll) and have a format with details of the last six salaries.	7/15/2025	Franko Guzman	Martín Vargas	
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	7/1/2025	Establish a control table for errors detected in the implementation of the new payment system	7/31/2025	Juan Elvis Chavarria	William López	
	7/21/2025	Hold a feedback session with the staff involved.	July 31, 2025	Franko Guzmán	Martín Vargas	
<b>Date of Response</b>	27.06.2025					
<b>Audit Team Conclusion</b> (including any evidence reviewed)	<p>The plan was approved on 07/03/2025.</p> <p>The company presents the following evidence for the closure of non-conformities.</p> <ul style="list-style-type: none"> <li>* Evidence of an email sent to the accounting team on August 11, 2025. The email reports inconsistencies detected in the calculations of contract settlements (specifically in severance pay and service bonuses) generated by the KACTUS payroll system. Because of this, Accounting is formally requested to manually verify <i>all</i> settlements for the year 2025 before proceeding with payments. It is clarified that this is a temporary control measure while the supplier Heinsohn fixes the root cause of the error.</li> <li>* Evidence of email sent to Kactus support (HEINSOHN) on August 11, 2025, with the subject line "CONTRACT SETTLEMENT INCIDENT (Ticket 101140)". The email reports a critical error in the system, as for employees with a fixed salary, the software calculating the Service Bonus and Severance Pay based on an average salary instead of the last fixed salary. Evidence (documents 2.2 and 2.3) demonstrates the inconsistency is attached, and an urgent correction is requested.</li> <li>* Settlement summary: This document is a settlement for termination of contract from the company Industrial Aceitera de la RAAS S.A. for employee 6240705890000R, who held the position of "UNSKILLED LABOR." The employee worked for 8 months and 21 days, from 06/26/2024 to 06/15/2025, with a monthly salary of C\$ 10,104.00. The total amount of benefits (severance pay, Christmas bonus, and vacation pay) was C\$ 16,956.75. After applying deductions of C\$ 877.05, the worker received a final payment of C\$ 16,079.70. The document is dated 06/25/2025.</li> <li>* Sample Settlement paid July 25, IARAAS: This file contains two settlements from INDUSTRIAL ACEITERA DE LA RAAS S.A., both dated 08/06/2025 and with a departure date of 07/31/2025. The first is for 6032805021004L, who worked for 10 months and 6 days (position: UNSKILLED LABOR) and received a final payment of C\$ 21,591.73. The second is for NORVIN EVENOR BELLO OPORTA, who worked for 8 months and 11 days (position: UNSKILLED LABOR) and received a final payment of C\$ 16,558.50. Both workers had a monthly salary of C\$ 10,811.28.</li> </ul>					



	<p>* Sample Settlement paid Aug. 2, 25 IARAAS: This document presents two settlements from INDUSTRIAL ACEITERA DE LA RAAS S.A., dated 08/22/2025. Both workers joined on May 2, 2025, and left on August 15, 2025, working for 3 months and 14 days. The first employee, 6243108001000J, had a salary of C\$ 10,811.28 and received a final payment of C\$ 7,400.82 after deductions that included "OTHER DEDUCTIONS." The second, PABLO VICENTE ALVAREZ SEQUEIRA, had a salary of C\$ 13,020.73 and received a total settlement of C\$ 10,499.18.</p> <p>* KACTUS EMPLOYMENT CONTRACT SETTLEMENT VALIDATION INSTRUCTIONS (UN-CH-IT-06), approved on October 23, 2025, are presented. Its purpose is to establish the methodology to be followed by the accounting department to manually validate the settlement calculations (Bonus, Severance Pay, Interest, and Vacation Pay) generated by Kactus before authorizing payment. The instructions detail how to verify the settlement bases (Fixed vs. Variable Salary) and report inconsistencies to HR.</p> <p>* Email sent to Accounting on October 23, 2025, to formally share the validation instructions. The email attaches the instructions (UN-CH-IT-06) and reiterates the responsibilities: Accounting must perform the manual validation before payment, and HR must verify compliance with this instruction. It is indicated that the instructions take effect immediately.</p> <p>* An Excel spreadsheet quantifying the impact of the error is presented. The "IARAAS Base" lists the affected employees, detailing for each one the correct salary versus the erroneous base calculated by Kactus; the "IARAAS Table" summarizes the data, showing a total of 2 affected employees.</p> <p>The evidence presented is accepted and the non-conformity is closed on 04.11.2025</p>
<p><b>Status of Nonconformity</b></p>	<p><input checked="" type="checkbox"/> Closed  <input type="checkbox"/> Open</p>
<p><b>Date of Closure:</b></p>	<p>04.11.2025</p>

<b>Indicator Number</b>	6.2.3(C)
<b>Nonconformity Number</b>	11
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>          There are some inconsistencies in the application of labor regulations.</p> <p>At Cukra Development Corporation (plantations), the following developments were identified:</p> <ul style="list-style-type: none"> <li>• For agricultural field workers, employment contracts stipulate that the working day is from 5:30 a.m. to 1:30 p.m. However, in interviews with 15 workers, they indicated that talks and some training sessions begin at 5:00 a.m., but they always record their arrival time as 5:30 a.m. These talks and training sessions are not remunerated.</li> <li>• Harvest workers interviewed who live in the Kukra Hill community (approximately 12 km from the company) indicate that the personnel transport drops them off at their assigned plots on the plantation at 3:50 a.m. and they have to wait until 5:30 a.m. to sign in and start work. This waiting time in the plots before starting work is not paid.</li> </ul>	



- When agricultural workers are on the fertilizer roster, they must be at the company between 4:00 and 4:15 a.m. to load fertilizers, without registering this as the start of their workday, since they only register at 5:30 a.m. when they begin fertilizing the assigned plots on the plantation and finish work at 1:30 p.m. Payment for loading and fertilizing is evident, although the start time is not accurately recorded.

The three above cases violate the labor code in TITLE III, WORKING HOURS, BREAKS, LEAVE, AND VACATIONS, CHAPTER I, Art. 49: "Working hours are understood to be the time during which the worker is at the employer's disposal, fulfilling their work obligations. The worker is considered to be at the employer's disposal from the moment they arrive at the place where they are to perform their work, or where they receive orders or instructions regarding the work to be performed during the working day, until they are free to dispose of their time and activity as they wish."

- The manager of La Mulera (District B - Finca Almendro) reports in an interview that he works from 4:00 a.m. and leaves work between 2:30 p.m. and 3:00 p.m. He also reports that he has worked continuously for several months without days off since he started working approximately one year ago.

Upon review of the records of the worker in question, it was found that the worker signed an agreement with the company to work a split shift, which states: actual start time of work from Monday to Saturday (from 4:00 a.m. to 8:00 a.m.), break period (4 hours) from 8:00 a.m. to 12:00 p.m., departure time (from 12:00 p.m. to 4:00 p.m.), duration of the workday and discontinuous daytime rest of 8 hours per day and 48 hours per week with 4 hours of rest. Comparing the records of the working hours for the first half of January 2025 and the second half of 2025, it is reported that he worked from Monday to Saturday, when in fact he worked until Sunday (which was paid). Additionally, the attendance sheet recorded hours that do not coincide with the split shift agreement. Finally, it is evident that the worker is not resting on the seventh day as stipulated by law.

The above violates the labor code in the following points:

CHAPTER II On Breaks and Leave, Art. 64.- For every six days of continuous work or equivalent hours, the worker shall be entitled to a day off or seventh day, at least, with full pay. The weekly day of rest shall be Sunday, except in cases provided for by law. Art. 65.- Compensatory days for weekly days of rest or seventh days worked must be remunerated as extraordinary days of work.

CHAPTER IV, Art. 17 "k) Respect the working day and grant the established breaks.

- In the revised settlement of an agricultural worker's employment contract due to voluntary resignation, and with 15 days' notice, the worker was not paid seniority pay as indicated in Art. 42 of the Labor Code. The human resources department indicates that, by analogy, a ruling of the Labor Court applies, namely the decision not to pay seniority compensation for failure to comply with Art. 44 of the Labor Code, due to absence without just cause for one day during the notice period. There is no evidence that this measure is stipulated in the Internal Work Regulations or in the identification of legal requirements.

**Evidence:**

- Document review
- Nicaraguan Labor Code
- Attendance sheets for field workers



Root Cause Analysis	Unpaid training (outside working hours) and waiting times					
	Analyze: What are the causes and why?					
	Category	Root cause	Why 1	Why 2	Why 3	Why 4
1. Labor	Workers arrive at the lots (work sites) from 3:50 a.m.	Because personnel transportation begins its routes very early	Because there are long routes to reach the last farm on time	Because some farms share the same transportation		
2. Environment						
3. Material/Raw Material						
4. Method	The talks and some training sessions take place from 5:00 a.m., but the time of entry is recorded at 5:30 a.m. These talks and training sessions are not remunerated.	Because there is no procedural rule stating that 5-minute talks must be included in the working day, and the times recorded are geared toward productive activity.	Because there is a lack of standardization, oversight, and supervision by the competent authority.	Because the procedures related to the schedules of talks and staff transportation have not been updated from a workplace well-being perspective.		
5. Machinery	Staff transportation	Because there is no equipment	Because there are no transportation	Because there is no demand for		



/Equipment	drops Ingenio 1 workers off at their assigned lots at 3:50 a.m., where they wait until 5:30 a.m., and this time is not paid	assigned by payroll that allows for timely arrivals at the start of the workday	providers in the area and the company's own transportation fleet for personnel is not yet complete.	personnel transport rental in the area, and the purchase of our own equipment depends on annually allocated budgets.		
6. Measurement	There is no control or audit of unpaid waiting time or of talks and training received outside working hours	Because it is not formally considered part of working time and had not been viewed from the perspective of occupational well-being	Because there is no field visit plan for the analysis of workplace well-being by Human Capital	Because it has not been considered a critical issue within the monitoring of the OHS plan		
<b>Records of working hours for fertilizer loading</b>						
<b>Analyze: What are the causes and why?</b>						
<b>Category</b>	<b>Root cause</b>	<b>Why 1</b>	<b>Why 2</b>	<b>Why 3</b>	<b>Why 4</b>	
1. Labor	Staff perform tasks before the formal start of the workday (5:30 a.m.) without recording them as part of their workday.	Because they have to load fertilizer from 4:00-4:15 a.m.	Because that is how the operational routine has been structured by agricultural managers	Because this has been the way to efficiently operate and manage the nutrition plan allocations		
2. Environment	The fertilizer is loaded before the application	Because it is necessary to	Because travel and loading times	Because operational		



		day begins, before dawn, and is not recorded as the start of the working day	start early to cover the application work in the field	require advance planning	efficiency is prioritized and the start time for fertilizer loading had not been determined		
	3. Material/Raw Material						
	4. Method	There is no procedure specifying how to record activities prior to the official start of the workday	Because it has been assumed that the workday begins with batch processing (not loading).	Because Human Capital has not formally defined which activities constitute working time.	Because traditionally, the application time is recorded even though the loading and application of fertilizer are paid for		
	5. Machinery/Equipment	The time control system does not reflect the recording of previous activities carried out in another area	Because the record is made only when the employee arrives at the plot	Because the need to record preparatory activities as part of the workday has not been identified			



6. Measurement	There is no formal control of the actual start time of preparatory tasks in fertilization	Because it is believed that paying for the fertilizer loading activity is sufficient	Because there is no cross-checking between actual time worked and workday records	Because compliance with working hours is not evaluated based on actual operations		
<b>Split working hours and rest days</b>						
<b>Analyze: What are the causes and why?</b>						
<b>Category</b>	<b>Fundamental cause</b>	<b>Why 1</b>	<b>Why 2</b>	<b>Why 3</b>	<b>Why 4</b>	
1. Labor	The worker works without rest, including Sundays	Because the worker voluntarily agreed to work continuously during the peak production month	Because he believes he can easily perform the assigned tasks and there was no one else trained to care for the livestock	Because the other worker trained in livestock care terminated their employment relationship		
2. Environment						
3. Material/Raw Material						



	4. Method	The signed split-shift agreement is not properly recorded on the payroll	Because the payroll form is not designed for such recording and has not been modified according to actual needs				
	5. Machinery/Equipment	Compliance with the split-shift agreement is not verified	Because schedules are not recorded based on the split-shift agreement	Because only the legal limit on hours is monitored, not compliance with the individual agreement	Because the focus is on avoiding overtime, not on auditing exact compliance with working hours		
	6. Measurement	Compliance with the split-shift agreement is not verified	Because it is not part of their inspection or monitoring routines	Because it is trusted that supervisors apply it correctly			
<b>No seniority pay for unjustified absences</b>							
<b>Analyze: What are the causes and why?</b>							
	<b>Category</b>	<b>Fundamental cause</b>	<b>Why 1</b>	<b>Why 2</b>	<b>Why 3</b>	<b>Why 4</b>	<b>Why 5</b>
	1. Labor	The worker was not previously informed	Because the induction	Because, due to the time			



	about the application of the case law that conditions payment	provided is general, referring to the labor code, but not detailing specific cases	allocated for induction and the educational level of the workers, it is done in a simple and practical way to improve understanding			
2. Environment						
3. Material/Raw Material						
4. Method	National case law is applied without having been integrated into the company's internal regulatory framework	Because, as these are specific cases, explanations are provided on a case-by-case basis, as appropriate, and these communications are not documented				



	5. Machinery/Equipment						
	6. Measurement	There are no standardized formats for documenting decisions based on court rulings	Because settlement management follows routine operational processes	Because the focus is on executing what has already been established			
Correction(s)	<p><b>Unpaid training (outside working hours) and waiting times</b></p> <ol style="list-style-type: none"> <li>1. Inform area managers that transporting personnel so far in advance of the formal start of the workday should be avoided</li> <li>2. Review the induction and training procedure to verify the existence of an internal rule establishing the schedule for talks and/or training sessions</li> <li>3. Request that those responsible for operations adjust routes and schedules, seeking a fairer distribution</li> <li>4. Record communication of working hours to workers and indicate the use of the PQRS communication mechanism in the event of waiting times exceeding 15 minutes</li> <li>5. Record daily evidence of the time of arrival and departure by means of the worker's signature.</li> <li>6. Audits to verify arrival times at the work site and compliance with working hours.</li> </ol> <p><b>Time records for fertilizer loading work</b></p> <ol style="list-style-type: none"> <li>1. Inform supervisors and fertilization managers that all work activities must be supported by the corresponding entry and exit records.</li> <li>2. Review how payment for these activities that were not previously recorded in the time control system is being managed</li> <li>3. Coordinate a field validation of the actual arrival times of fertilization personnel</li> </ol> <p><b>Split shifts and rest days</b></p> <ol style="list-style-type: none"> <li>1. Instruct supervisors to ensure that workers enjoy one day off per week</li> <li>2. Review the working hours record of the worker involved</li> <li>3. Vacation time was scheduled for July 2025</li> </ol> <p><b>Non-payment of seniority pay for unjustified absence</b></p>						



	<p>Include in the induction process information on the loss of the right to seniority pay for unjustified absence, based on case law related to this issue.</p> <ol style="list-style-type: none"> <li>Analyze resignations in 2024 and the period of 2025, where there is data on cases of non-payment of seniority due to unjustified absence, and send evidence to close the finding.</li> <li>Analyze settlements in which the right to seniority compensation is lost and the calculations are correct; evidence will be sent to close the finding.</li> </ol>																																
<p><b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i></p>	<p><b>Unpaid training (outside working hours) and waiting times</b></p> <table border="1" data-bbox="685 603 2022 1358"> <thead> <tr> <th colspan="5" data-bbox="685 603 2022 663">Action Plan (Implement actions)</th> </tr> <tr> <th data-bbox="685 663 943 783" rowspan="2">Start Date</th> <th data-bbox="943 663 1413 783" rowspan="2">Action</th> <th data-bbox="1413 663 1592 783" rowspan="2">End date</th> <th colspan="2" data-bbox="1592 663 2022 715">Names of those responsible</th> </tr> <tr> <th data-bbox="1592 715 1845 783">To do</th> <th data-bbox="1845 715 2022 783">Verify</th> </tr> </thead> <tbody> <tr> <td data-bbox="685 783 943 916">7/1/2025</td> <td data-bbox="943 783 1413 916">Review current routes and arrival times in the field with area managers</td> <td data-bbox="1413 783 1592 916">7/10/2025</td> <td data-bbox="1592 783 1845 916">Milton Pérez Yersson Chavez Néstor Romero</td> <td data-bbox="1845 783 2022 916">Martin Vargas</td> </tr> <tr> <td data-bbox="685 916 943 1048">7/8/2025</td> <td data-bbox="943 916 1413 1048">Update operating procedures to include guidelines on transportation</td> <td data-bbox="1413 916 1592 1048">7/20/2025</td> <td data-bbox="1592 916 1845 1048">Milton Pérez Yersson Chavez Néstor Romero</td> <td data-bbox="1845 916 2022 1048">Martin Vargas</td> </tr> <tr> <td data-bbox="685 1048 943 1201">July 8, 2025</td> <td data-bbox="943 1048 1413 1201">Provide the necessary transportation units for the different routes to ensure that waiting times are eliminated.</td> <td data-bbox="1413 1048 1592 1201">7/31/2025</td> <td data-bbox="1592 1048 1845 1201">Comptroller</td> <td data-bbox="1845 1048 2022 1201">Martín Vargas</td> </tr> <tr> <td data-bbox="685 1201 943 1358">7/15/2025</td> <td data-bbox="943 1201 1413 1358">Include this topic in the monthly monitoring of compliance with the OHS plan.</td> <td data-bbox="1413 1201 1592 1358">7/31/2025</td> <td data-bbox="1592 1201 1845 1358">Cayley Putchie</td> <td data-bbox="1845 1201 2022 1358">Franko Guzman</td> </tr> </tbody> </table>	Action Plan (Implement actions)					Start Date	Action	End date	Names of those responsible		To do	Verify	7/1/2025	Review current routes and arrival times in the field with area managers	7/10/2025	Milton Pérez Yersson Chavez Néstor Romero	Martin Vargas	7/8/2025	Update operating procedures to include guidelines on transportation	7/20/2025	Milton Pérez Yersson Chavez Néstor Romero	Martin Vargas	July 8, 2025	Provide the necessary transportation units for the different routes to ensure that waiting times are eliminated.	7/31/2025	Comptroller	Martín Vargas	7/15/2025	Include this topic in the monthly monitoring of compliance with the OHS plan.	7/31/2025	Cayley Putchie	Franko Guzman
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July 15, 2025	Update and socialize induction and training procedures with guidelines on training schedules	July 31, 2025	Franko Guzmán	Martín Vargas	
<b>Records of schedules for fertilizer loading work.</b>					
<b>Action Plan (Implementing actions)</b>					
Start date	Action	End date	Names of those responsible		
			Do	Verify	
6/7/2025	Record start of fertilizer loading work	7/12/2025	Supervisors	Néstor Romero	
7/10/2025	Train supervisors on recognizing effective working hours (from start to finish) regardless of the work or activities they perform.	7/20/2025	Franko Guzmán	Martín Vargas	
8/1/2025	Conduct audits to verify the start and end times of work and compare them with what is posted on the timesheets, regardless of the activities performed.	8/15/2025	Comptroller	Management	
<b>Split workdays and days off.</b>					
<b>Action Plan (Implement actions)</b>					
Start date	Action		Names of those responsible		



		End date	To do	Verify	% progress
July 1, 2025	Inform all supervisors of their obligation to comply with and respect the agreed working hours.	7/5/2025	Franko Guzman	Martín Vargas	
7/10/2025	Train staff on the importance of mandatory weekly rest periods	7/20/2025	Supervisors	Franko Guzman	
July 10, 2025	Recording split shifts on the timesheet	7/20/2025	Supervisors	Franko Guzman Leonidas Blandón	
August 1, 2025	Conduct audits to verify the recording of hours worked in split shifts and compare with what is posted on timesheets.	8/15/2025	Comptroller	Management	
<b>Non-payment of seniority for unjustified absence.</b>					
<b>Action Plan (Implement actions)</b>					
Start Date	Action	End date	Names of those responsible		
			To do	Verify	
July 1, 2025	Request a written legal opinion from the Ministry of Labor on the applicable case law and its implementation.	8/15/2025	Legal Department	Franko Guzmán	



	7/8/2025	Prepare instructions for the application of case law in labor calculations	7/18/2025	Franko Guzmán	Martín Vargas		
	August 15, 2025	Include the topic in the initial induction according to the legal ruling issued by the Ministry of Labor	08/31/2025	Franko Guzmán	Martín Vargas		
<b>Date of Response</b>	18.07.2025						
<b>Audit Team Conclusion</b> (including any evidence reviewed)	<p>The plan was approved on 08/01/2025  The company presents the following evidence for the closure of non-conformities:</p> <p><b>Unpaid training (outside working hours) and waiting times</b></p> <p>* An email chain is presented, starting on Monday, August 11, 2025, with the subject line "Working hours and transportation." The email seeks to instruct recipients to "Avoid transporting staff so far in advance," "Adjust routes and schedules," and "Record communication of working hours to workers." In addition, it specifies that staff should be instructed to use the "PQRS communication mechanism" for waits longer than 15 minutes and to "Update operating procedures to include guidelines on transportation."</p> <p>* Attendance records for District A workers are presented, "CONTROL OF PAID WORK PER DAY" from Cukra Development Corporation, with the main date of 08/09/2025. The main record details Form 417 for Farm 0307 and lists the employees, with their arrival (Hr-E) and departure (Hr-S) times, showing shifts starting at 5:30 or 6:00. The file also includes records from Timesheet 434 (Farm 0312, 08/08/2025) and Timesheet 312 (Farm 0305, 08/08/2025).</p> <p>* Attendance records for workers in District B are presented, including Form 405 from Finca Delicios, dated 08/07/2025, which records start times of 5:30 and 6:00. Also submitted are Timesheet 418 for Farm 0317</p>						



	<p>(08/08/2025) and Timesheet 410 for Farm 0318 (09/08/2025), detailing the hours worked by the staff of each farm.</p> <p>* Cukra Development Corporation training records, most of which took place in August 2025. The talks, usually lasting 10 to 15 minutes and given at 5:30 AM, dealt with topics such as: "Working Hours," "Addressing the Issue of Staff Transportation," "Avoiding Transporting Staff Too Far in Advance," "Adjusting Routes and Schedules," "Use of PQRS in case of non-compliance," "What are the start and end times," and "What is a day shift."</p> <p>* Email sent on Thursday, August 21, 2025, with the subject line "Verification of staff entry and transportation - Farms." The email reports on a visit made on August 20 to comply with an RSPO audit action plan. It was found that personnel enter at 5:20 a.m. at Malopi I (10 minutes early) and at 5:15 a.m. at Malopi II (15 minutes early). It was also verified that the transport vehicles (trucks) comply with minimum conditions, such as valid legal documentation, operator's license, seats in appropriate condition, and optimal tarps or roofing.</p> <p>* Cukra Development Corporation induction and training procedure, identified with the code UN-CH-PO-01, Version 2, and last revised on 08/04/2025. Its objective is to establish guidelines for the identification, planning, execution, and monitoring of staff training. The change control for Version 2 indicates that on 08/04/2025, a guideline was incorporated requiring training to be provided during working hours. This guideline is repeated verbatim in sections 7.3 (external) and 7.4 (internal), establishing that all talks or training must be conducted during working hours.</p> <p>* A record of an email is presented, originally sent on July 10, 2025, and forwarded as a reminder on Tuesday, August 12, 2025. The email communicates an adjustment to the Induction and Training Procedure. The key adjustment is the strict compliance instruction stating: "All talks or training must be conducted during working hours." Additionally, it requests that the procedure be shared and that an "Internal Training Plan" be maintained.</p> <p>*Minutes of the meeting (UN-GE-RE-02) of Cukra Development Corporation, which took place at the Central Office on September 1, 2025. The meeting was convened by Human Capital for the purpose of following up on and complying with the RSPO (audit) findings. The main topic discussed was current staff routes and arrival times at different farms. According to the comments recorded in the minutes, staff transportation routes were reviewed and it was verified that arrivals at the farms are in accordance with established guidelines.</p> <p>*Training record (UN-CH-RE-03) from Cukra Development Corporation for the CDC department, monthly payroll, is presented. The training was held on August 5, 2025, in the Agriculture Meeting Room. The topic of the session was the Socialization of Induction and Training Procedures, with the objective of communicating the guidelines for conducting staff inductions and training. The topics covered during the session were: Objectives, scope, definitions, induction, training plan, training needs, internal training, and external training.</p> <p>* Invoice No. 0370678 from Casa Pellas, S.A. addressed to CUKRA DEVELOPMENT CORPORATION S.A. is presented, dated August 23, 2025. This invoice details the cash purchase of a new HINO truck, Series 500, Model FG1JM7A-AG1, model year 2026, for a grand total of C\$ 2,435,515.95.</p>
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	<p>*Two photographs are presented. Both images show a white cab truck, identified with the number 5002-058 on the door, which has been adapted with a yellow metal and mesh rear body, visibly designed for personnel transport.</p> <p>Additionally, three training records (UN-CH-RE-03) from Cukra Development Corporation are presented. Two records are dated August 5, 2025, and one is dated August 7, 2025, addressed to the CDC and IARAAS departments. The main topic of these trainings was the legal management of working hours and mandatory breaks. The topics covered included: Legal framework, Employer obligations, Mandatory weekly breaks, Training during working hours, and Split shifts; the August 7 session added the topic of Induction Procedure.</p> <p>* Harvest OHS audit report (CD-CH-RE-33) from Cukra Development Corporation, dated August 28, 2025, is presented. The audit was carried out at Finca Borbollon, District "A," evaluating 92 workers. The results showed 83% compliance and 17% non-compliance. The specific non-compliance (NC) details identified were: workers wearing aprons in poor condition, workers using the machete without its protective sheath, workers leaving the tool (machete) poorly positioned before sharpening, and banana leaves that were observed to be poorly stacked.</p> <p>*Report corresponds to an OHS harvest audit (CD-CH-RE-33) of Cukra Development Corporation, conducted on August 28, 2025. The assessment was applied at Finca La Palma, District "A," auditing 21 supervised workers. The compliance result was 97% (with an acceptance rate of 96%) and 3% non-compliance. Three non-compliances (NC) were recorded: the supervisor was not wearing a visible red hat, one worker was observed with a damaged apron, and one worker was carrying a machete without a sheath.</p> <p><b>Time records for fertilizer loading work</b></p> <p>* Field Verification Report: Entry and Exit of Fertilization Personnel, dated August 15, 2025. The report is issued by the Process Auditor and addressed to the Comptroller General. It details the evaluation of Timesheet 406 - District B and Timesheet 316 - District A, with the objective of verifying in the field the start and end times of fertilization personnel, verifying the actual record on the timesheet, and reconciling the posted units. The result of the evaluation was that no inconsistencies were detected; it was verified that the timesheet correctly reflects the actual arrival and departure times of the personnel, backed up by the signature of each employee. The file also includes images of the audited timesheets 406 and 316.</p> <p>* Training record (UN-CH-RE-03) of Cukra Development Corporation for the JARAAS department, Monthly Payroll, held on August 7, 2025, in the IARAAS Meeting Room. The subject was the legal management of working hours and mandatory breaks. The topics covered included: Legal framework, obligations, Training during the workday, Mandatory weekly breaks, Induction and training procedures. The objective was to ensure legal compliance for communications, split shifts, and mandatory breaks, as well as to communicate the POE for induction training.</p> <p>* Multiple forms for DAILY PAID WORK CONTROL from Cukra Development Corporation are presented, all corresponding to August 11, 2025. The records, which were marked as TYPED mostly on August 12, 2025, detail</p>
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	<p>the arrival (Hr-E) and departure (Hr-S) times of employees at various farms and payrolls. It includes payrolls 316, 317, 319, 320, 407, 441, and 457.</p> <p>*Training record (UN-CH-RE-03) from Cukra Development Corporation, dated August 5, 2025, for the CDC department (Mangualistos and Monthly payrolls). The training was given in the Agriculture Meeting Room. The subject was the legal management of working hours and mandatory breaks. The topics covered, with obvious transcription errors in the document, were: Legal matters, Employee obligations, Mandatory weekly breaks, Training during working hours, and How split shifts work. The objective was to ensure legal compliance for communications, split shifts, and mandatory breaks.</p> <p>* Record of an email chain started on August 11, 2025, with the subject line "Fertilizer work schedules." Five actions are requested: 1. Inform supervisors that all activities must be recorded upon arrival and departure; 2. Review payment for previous unrecorded activities; 3. Coordinate field validation of actual schedules for fertilization personnel; 4. Record the start of fertilizer loading work; and 5. Conduct audits to verify records against what is posted on spreadsheets. The email requests support in conducting this audit and obtaining evidence, and the email is subsequently forwarded with the instruction to attach as evidence.</p> <p><b>Split workdays and rest days</b></p> <p>* A chain of emails from Cukra Development Corporation from August 2025 is presented. The main email, sent on August 14, 2025, informs several recipients about the creation of code 8089 called Rest. It specifies that this code will be used to record mandatory breaks, will be paid as regular time, and will affect the calculation of work. The email is a response to a previous query from Leonidas Aragón Leiva about how to record the mandatory rest day in the system.</p> <p>* A Training Record (UN-CH-RE-03) from Cukra Development Corporation is presented for the CDC department, Mangualistos payroll. The training took place on August 5, 2025, in the Agriculture Meeting Room and lasted 1.5 hours. The subject was the legal management of the workday and mandatory breaks. The topics covered were: Legal issues, Employee obligations, Mandatory weekly breaks, Training during the workday, and How split shifts work. The objective was to ensure legal compliance for communications, split shifts, and mandatory breaks.</p> <p>* A training record (UN-CH-RE-03) from Cukra Development Corporation is presented, given on August 7, 2025, in the IARAAS Meeting Room. It was aimed at the IARAAS department. The topic was the legal management of working hours and mandatory breaks. The topics covered included: Legal framework, obligations, Training during the workday, How split shifts work, Mandatory weekly breaks, Induction and training procedure. The objective was to ensure legal compliance for communications, split shifts, and mandatory breaks, as well as to communicate the POE for induction training.</p> <p>* A file containing three vacation request letters from the Harvest Supervisor is presented. The first letter, dated April 4, 2025, requests one day of vacation on April 5, 2025. The second, dated June 16, 2025, requests 2 days</p>
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	<p>of vacation, specifically June 17 and 26, 2025. The third letter, dated July 17, 2025, requests 1 day of vacation for July 18, 2025.</p> <p>* Cukra Development Corporation's vacation record is submitted for the harvest supervisor, who joined the company on October 1, 2014. The document details his vacation history, showing that he had 30 days accumulated for the 2024-2025 period. Four vacation days taken during 2025 are recorded: April 5 (1 day), June 17 (1 day), June 26 (1 day), and July 18 (1 day). As of July 18, 2025, he had a balance of 26 vacation days remaining.</p> <p>* A Vacation Slip (UN-CH-FO-05) from Cukra Development Corporation is submitted authorizing the Harvest Supervisor to take 1 day of vacation. The request was made on April 4, 2025, to enjoy the day on April 5, 2025, with a return date of April 6, 2025. The form is approved by the Immediate Supervisor and Human Resources. Additionally, a Vacation Form (UN-CH-FO-05) from Cukra Development Corporation for the Harvest Supervisor. The request was made on June 16, 2025, to take 2 days of vacation, corresponding to June 17 and June 26, 2025. The worker's return date was scheduled for June 27, 2025. The form has the approval signatures of the Immediate Supervisor and Human Resources. Finally, Vacation Form (UN-CH-FO-05) from Cukra Development Corporation approving a vacation request for the harvest supervisor. 's request was made on July 17, 2025, to take one day of vacation on July 18, 2025. The return date to work was July 19, 2025. The form is signed and approved by the Immediate Supervisor and Human Resources.</p> <p>* Record of an email chain from Cukra Development Corporation. It begins with a query made on August 14, 2025, about how to record the mandatory rest day. The main response is from Franko Gregorio Guzman on the same day, addressed to several employees, informing them that code 8089, called Rest, has been created. It specifies that this code will be used to record mandatory rest days, will be paid as regular time, and will affect the calculation of work. The email is forwarded on August 19, 2025.</p> <p>* Registration of multiple forms of CONTROL OF WORK PAID PER DAY from Cukra Development Corporation, corresponding to August 2025 (dates August 12, 13, and 14). The records belong to forms 406, 457, and 407, all associated with District B. These controls detail the workers' arrival, departure, break, and split shift times, with the supervisor's approval signatures and DIGITADO marks.</p> <p>* Same situation for District A, specifically forms 316, 320, and 319. The records are dated August 12, 13, and 14, 2025. These forms document the PERSONAL DETAILS OF SPLIT SHIFTS, recording the start and end times of the first shift, the break, and the second shift, with the corresponding approval signatures and DIGITADO stamps.</p> <p>* A report from Cukra Development Corporation is presented, dated August 15, 2025, addressed to the (Comptroller General) and written by the (Process Auditor). The subject is the Review and Compliance Report on Split Shifts in Districts A and B. The objective was to verify compliance with schedules, the correct application of the payment code, and proper recording on the payroll. The review of payrolls 316, 319, 320</p>
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(District A) and 406, 407, 457 (District B) from August 12 to 14 concluded that no inconsistencies were detected and that split shifts are being recorded and paid in accordance with the guidelines.

**Non-payment of seniority for unjustified absence**

\* Record of a Knowledge Assessment (UN-CH-FO-15) by Cukra Development Corporation, conducted on a worker on August 1, 2025. The assessment focuses on the point of non-payment of severance pay for abandonment of work. The worker correctly answered the question about the consequences of abandoning work, selecting the option that indicates that he loses the right to seniority compensation (Art. 45 C.T).

\* Two documents are presented from an analysis of the Detail of Personnel without Severance Pay for the years 2024 and 2025 at Cukra Development Corporation (CDC) and IARAAS. One file details a monthly summary of the number of terminations, while the other provides a detailed database of each employee. This database includes the name, date of termination, company (CDC or IARAAS), and Type of Termination. The predominant types of termination that resulted in non-payment of severance pay are abandonment of work, probationary period, and unjustified absences.

\* Record of a legal consultation letter, dated August 12, 2025, sent by the Human Capital Manager of Cukra Development Corporation S.A. to the Ministry of Labor (MITRAB). In the letter, the company requests confirmation of its interpretation of Article 45 of the Labor Code. Specifically, they ask whether a worker who abandons their job or incurs a cause for dismissal under Article 48 loses the right to severance pay, even if said worker submits a formal resignation after committing the offense.

\* A response document dated August 15, 2025, is submitted by the Legal Department of the Ministry of Labor to the company's inquiry regarding Resignation and Loss of Seniority Compensation. The legal opinion clarifies that, according to Article 45 of the Labor Code, the right to severance pay is lost if the contract is terminated due to abandonment of work or for just cause under Article 48. The firm maintains that a resignation submitted by the worker after having committed a serious offense does not reverse the effects of said offense, and the company is not obligated to pay compensation if it can prove that the offense occurred before the resignation.

\* Cukra Development Corporation's Settlement Validation Instructions (UN-CH-IT-06) are presented, effective July 31, 2025. Their purpose is to establish guidelines for the validation of settlements for employees who terminate their employment relationship. The instructions detail the responsibilities of the Human Capital Generalist. Specifically, they must validate that the reason for termination is not abandonment or probationary period and, in such cases, they must ensure and validate that compensation is not being paid.

\* Training record (UN-CH-RE-03) from Cukra Development Corporation, dated August 1, 2025, is presented, documenting the dissemination of the Severance Pay Validation Instructions (UN-CH-IT-06). The topics covered were: Objective, Scope, General Information, Control Points, and Responsibilities. The objective of the session was to communicate the guidelines for the validation of settlements.



\* Settlement error records for CDC and IARAAS companies during 2024 and 2025 are presented. The summary tables identify a single type of error: Payment of compensation for abandonment. The records detail specific cases where this compensation was erroneously paid even though the reason for termination was abandonment. For CDC, errors are listed between October 2024 and February 2025; for IARAAS, errors were recorded between November 2024 and January 2025, detailing the amounts paid and marking the error as Identified.

\* Settlement records for the years 2024 and 2025 are presented as follows:

**2025**

Document 1

- Identity Card: 6080908991001V
- Last Position: Agricultural Harvest Worker
- Date of Entry: 10/16/2024
- Date of Departure: 01/15/2025
- Time Worked: 0 year(s) 3 month(s) 0 day(s)
- Total Benefits (Bonus + Vacation): C\$1,729.61
- Total Deductions (INSS LABORAL): -C\$70.38
- Total Settlement: C\$1,659.23

Document 2

- Identity Card: 6081404041001W
- Last Position: Agricultural Harvest Worker
- Date of Hire: 10/16/2024
- Date of Departure: 01/15/2025
- Time worked: 0 year(s) 3 month(s) 0 day(s)
- Total Benefits (Bonus + Vacation): C\$1,800.43
- Total Deductions (INSS LABORAL): -C\$73.22
- Total Settlement: C\$1,727.21

Document 3

- Identity Card: 6241508041000C
- Last Position: Agricultural Harvest Worker
- Date of Hire: 10/08/2024
- Start Date: February 28, 2025
- Time Worked: 0 year(s) 4 month(s) 21 day(s)
- Total Benefits (Bonus + Vacation): C\$2,340.86
- Total Deductions (INSS LABORAL): -C\$59.61



	<ul style="list-style-type: none"> <li>• Total Settlement: C\$2,281.25</li> </ul> <p>Document 4</p> <ul style="list-style-type: none"> <li>• Identity Card: 6042303760001M</li> <li>• Last Position: Agricultural Harvest Worker</li> <li>• Date of Hire: 01/11/2025</li> <li>• Date of Departure: 03/31/2025</li> <li>• Time Worked: 0 year(s) 2 month(s) 21 day(s)</li> <li>• Total Benefits (Bonus + Vacation): C\$1,573.42</li> <li>• Total Deductions (INSS LABORAL): -C\$36.75</li> <li>• Total Settlement: C\$1,536.67</li> </ul> <p>Document 5</p> <ul style="list-style-type: none"> <li>• Identity Card: 4912407830001M</li> <li>• Last Position: Agricultural Harvest Worker</li> <li>• Date of Hire: 02/08/2025</li> <li>• Date of Departure: 04/15/2025</li> <li>• Time Worked: 0 year(s) 2 month(s) 8 day(s)</li> <li>• Total Benefits (Bonus + Vacation): C\$1,314.09</li> <li>• Total Deductions (INSS LABORAL): -C\$35.54</li> <li>• Total Settlement: C\$1,278.55</li> </ul> <p>Document 6</p> <ul style="list-style-type: none"> <li>• Identity Card: 6081911891000Q</li> <li>• Last Position: Agricultural Harvest Worker</li> <li>• Date of Hire: 12/16/2024</li> <li>• Date of Departure: 05/15/2025</li> <li>• Time worked: 0 year(s) 5 month(s) 0 day(s)</li> <li>• Total Benefits (Bonus + Vacation): C\$3,156.64</li> <li>• Total Deductions (INSS LABORAL): -C\$44.18</li> <li>• Total Settlement: C\$3,112.46</li> </ul> <p>Document 7</p> <ul style="list-style-type: none"> <li>• Identity Card: 3660110041001Y</li> <li>• Last Position: Hourly Agricultural Worker</li> <li>• Date of Hire: 07/06/2024</li> <li>• Date of Departure: 06/30/2025</li> </ul>
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	<ul style="list-style-type: none"> <li>• Time worked: 0 year(s) 11 month(s) 25 day(s)</li> <li>• Total Benefits (Bonus + Vacation): C\$7,682.50</li> <li>• Total Deductions: -C\$982.84 (Includes INSS LABORAL for -C\$182.84 and EMPLOYEE LOANS for -C\$800.00)</li> <li>• Total Settlement: C\$6,699.66</li> </ul> <p>Document 8</p> <ul style="list-style-type: none"> <li>• Identity Card: 6071511031002J</li> <li>• Last Position: Agricultural Harvest Worker</li> <li>• Date of Hire: 10/16/2024</li> <li>• Date of Departure: 07/15/2025</li> <li>• Time Worked: 0 year(s) 9 month(s) 0 day(s)</li> <li>• Total Benefits (Bonus + Vacation): C\$10,017.40</li> <li>• Total Deductions: -C\$1,902.53 (Includes INSS LABORAL for -C\$302.53 and EMPLOYEE LOANS for -C\$1,600.00)</li> <li>• Total Settlement: C\$8,114.87</li> </ul> <p><b>2024</b></p> <p>Settlement 1</p> <ul style="list-style-type: none"> <li>• Identity Card: 9192602001003A</li> <li>• Last Position: Hourly Worker</li> <li>• Date of Hire: 10/02/2023</li> <li>• Date of Departure: 01/07/2024</li> <li>• Time worked: 0 year(s) 3 month(s) 5 day(s)</li> <li>• Gross Total (Benefits): C\$2,283.99</li> <li>• Total Deductions (INSS): -C\$109.03</li> <li>• Net Payable: C\$2,175.00</li> </ul> <p>Settlement 2</p> <ul style="list-style-type: none"> <li>• Identity Card: 6010312930001H</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Hire: 11/08/2023</li> <li>• Date of Departure: 02/12/2024</li> <li>• Time Worked: 0 year(s) 3 month(s) 4 day(s)</li> <li>• Gross Total (Benefits): C\$2,455.34</li> </ul>
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	<ul style="list-style-type: none"> <li>• Total Deductions (INSS): -C\$96.99</li> <li>• Net Pay: C\$2,358.00</li> </ul> <p>Settlement 3</p> <ul style="list-style-type: none"> <li>• Identity Card: 6011303031003Y</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Hire: 01/24/2024</li> <li>• Date of Departure: 02/29/2024</li> <li>• Time Worked: 0 year(s) 1 month(s) 5 day(s)</li> <li>• Gross Total (Benefits): C\$1,704.21</li> <li>• Total Deductions: -C\$165.62 (Includes INSS and Others)</li> <li>• Net Pay: C\$1,539.00</li> </ul> <p>Settlement 4</p> <ul style="list-style-type: none"> <li>• Identity Card: 6270604920000T</li> <li>• Last Position: Laborer Piecework and Task</li> <li>• Date of Hire: 01/10/2024</li> <li>• Date of Departure: 02/29/2024</li> <li>• Time Worked: 0 year(s) 1 month(s) 19 day(s)</li> <li>• Gross Total (Benefits): C\$1,041.48</li> <li>• Total Deductions (INSS): -C\$33.75</li> <li>• Net Pay: C\$1,008.00</li> </ul> <p>Settlement 5</p> <ul style="list-style-type: none"> <li>• Identity Card: 6240204870000K</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Hire: 02/01/2024</li> <li>• Date of Departure: 03/31/2024</li> <li>• Time Worked: 0 year(s) 1 month(s) 30 day(s)</li> <li>• Gross Total (Benefits): C\$1,907.83</li> <li>• Total Deductions (INSS): -C\$52.36</li> <li>• Net Pay: C\$1,855.00</li> </ul> <p>Settlement 6</p> <ul style="list-style-type: none"> <li>• Identity Card: 6241510001000M</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Hire: 12/15/2023</li> </ul>
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	<ul style="list-style-type: none"> <li>• Date of Departure: 04/13/2024</li> <li>• Time Worked: 0 year(s) 3 month(s) 28 day(s)</li> <li>• Gross Total (Benefits): C\$3,895.43</li> <li>• Total Deductions (INSS): -C\$135.74</li> <li>• Net Pay: C\$3,760.00</li> </ul> <p>Settlement 7</p> <ul style="list-style-type: none"> <li>• Identity Card: 6082308920004F</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Admission: 03/20/2024</li> <li>• Date of Departure: 04/30/2024</li> <li>• Time Worked: 0 year(s) 1 month(s) 10 day(s)</li> <li>• Gross Total (Benefits): C\$1,351.52</li> <li>• Total Deductions (INSS): -C\$49.90</li> <li>• Net Pay: C\$1,302.00</li> </ul> <p>Settlement 8</p> <ul style="list-style-type: none"> <li>• Identity Card: 6030707981001D</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Hire: 02/26/2024</li> <li>• Date of Departure: 05/01/2024</li> <li>• Time Worked: 0 year(s) 2 month(s) 5 day(s)</li> <li>• Gross Total (Benefits): C\$2,001.95</li> <li>• Total Deductions (INSS): -C\$65.05</li> <li>• Net Pay: C\$1,937.00</li> </ul> <p>Settlement 9</p> <ul style="list-style-type: none"> <li>• Identity Card: 6152403011000Y</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Hire: 03/16/2024</li> <li>• Date of Departure: 05/31/2024</li> <li>• Time Worked: 0 year(s) 2 month(s) 15 day(s)</li> <li>• Gross Total (Benefits): C\$3,324.30</li> <li>• Total Deductions (INSS): -C\$111.75</li> <li>• Net Pay: C\$3,213.00</li> </ul> <p>Settlement 10</p>
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	<ul style="list-style-type: none"> <li>• Identity Card: 6011911881000Y</li> <li>• Last Position: Laborer Piecework and task</li> <li>• Date of Hire: 06/27/2023</li> <li>• Date of Departure: 06/15/2024</li> <li>• Time Worked: 0 year(s) 11 month(s) 18 day(s)</li> <li>• Gross Total (Benefits): C\$9,153.11</li> <li>• Total Deductions: -C\$774.83 (Includes INSS and Others)</li> <li>• Net Payable: C\$8,378.00</li> </ul> <p>The evidence is accepted and the non-conformities are closed on 05.11.2025</p>
<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
<b>Date of Closure:</b>	05.11.2025



<b>Indicator Number</b>	7.8.2(C)
<b>Nonconformity Number</b>	17
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b></p> <p>Sections of waterways, watercourses, and wetlands were identified on the Lima San José, Palmas Adultas, and Malopi I farms that do not have protection, riparian restoration, or differentiated management measures in place, in breach of the provisions of the Procedures for the Delimitation and Protection of Riparian Areas CD-SB-PO-12 and the Water Resource Management Procedure UN-SB-PO-11.</p> <p>During the tour of the wetland located on lot 1 of the Lima San José farm, it was observed that the area identified as a landing stage (where palm oil shipments were made) is completely unprotected, with no protection or restoration measures in place for the riparian zone. It is freely accessible and the soil adjacent to the edge of the wetland is unprotected.</p> <p>During the tour of lot 152 (N 12.296968, -83.769606) of the Palma Adulta farm, a watercourse was identified that connects a wooded area with a wetland that the company has left as a protection zone. During the tour of the watercourse, it was observed that 60% of its length is protected with a riparian zone and differentiated management measures (demarcation of approximately 20 meters). The rest of the watercourse lacks protection and differentiated</p>	



management measures until it reaches the forest patch, and light chapia is observed within the watercourse. (12.295129, -83.770360, 12.294597, -83.770908).

On the Malopi farm, lot 12, during the tour of the watercourse, it was observed that towards the end (30 meters), the riparian zone was interrupted and no actions aimed at establishing it were observed.

**Evidence:**

- Tour of the Lima San José, Palmas Adultas, and Milapas farms

**Root Cause Analysis**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	Riparian areas, watercourses, and bodies of water were identified on three farms that do not have protection, restoration, or differentiated management measures in place.	The staff responsible for environmental issues were faced for the first time with technical specifications that were new to them, as their expertise did not focus on natural resources.	The criteria that were known were those contained in national legislation, the recommendations of the AVC assessments, and the RSPO's Simplified Guide to Riparian Areas; but because the MU covers more than 9,000 hectares, they had been managed little by little.	The area does not have unlimited resources; the priority is RFF production, so they have started with the basics in terms of management and monitoring.	There is a lack of knowledge on specific issues related to AVC management and monitoring.	There is a lack of human resources to guide the process for local people.



	2. Environment	Riverside areas, watercourses , and bodies of water were identified on three farms that do not have protection, restoration, or differentiated management measures in place.	Because watercourse management is ambiguous and depends on subjective interpretation, it was believed that differentiated management was not necessary in that area.	Because the protection areas and biological corridor connections were subject to what had been included in the AVC maps, no on-site prioritization had been done to verify conditions.				
	3. Material/Raw Material							
	4. Method	Riparian areas, watercourses , and water bodies were identified on three farms that do not have protection, restoration, or	Because they were not included in the AVC management plans because they were not identified in that study.	Because the watercourses were not considered relevant water areas (according to the RSPO Riparian Zone Plan), and the restoration of Limas San José	Because there is ambiguity in national legislation regarding the treatment of watercourses as protection zones, which creates gaps in their technical interpretation;	Because current regulations do not precisely define the scope of protection for watercourses, which gives rise to different interpretations, and because	Because environmental legislation has not yet been updated to include more specific technical criteria on water infrastructure and because the environmental program operates with limited	



	differentiated management measures in place		and Malopi I was scheduled for the 2025 plan.	in addition, annual planning was prioritized according to budget availability.	the management area is managed according to annual planning to distribute resources gradually in accordance with restoration priorities.	resources that must be managed in a phased manner to ensure operational sustainability.																
	5. Machinery /Equipment																					
	6. Measurement																					
<b>Correction(s)</b>	<ol style="list-style-type: none"> <li>1. Field survey of affected areas, including coordinates, photographic record, and technical validation</li> <li>2. The section of the artificial canal on lot 152 of the Palmas Adultas farm was formally included in the Differentiated Management Plan</li> <li>3. The areas not intervened on the Lima San José and Malopi I farms were ratified in the 2025 Reforestation Plan, contemplating their intervention during the rainy season</li> </ol>																					
<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #333; color: white;"> <th colspan="5" style="text-align: center;">Action Plan (Implement actions)</th> </tr> <tr style="background-color: #ccc;"> <th style="width: 15%;">Start Date</th> <th style="width: 40%;">Action</th> <th style="width: 15%;">End Date</th> <th style="width: 25%;">Names of those responsible</th> <th style="width: 5%;"></th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>							Action Plan (Implement actions)					Start Date	Action	End Date	Names of those responsible						
Action Plan (Implement actions)																						
Start Date	Action	End Date	Names of those responsible																			



			To do	Verify	% progress
6/10/2025	Conduct a detailed survey using a Geographic Information System (GIS) of water bodies and areas of ecological connectivity in the UdCs, including: <ul style="list-style-type: none"> <li>• Identification and classification of functional connectivity.</li> <li>• Validation of their ecological contribution.</li> </ul>	7/15/2025	Environmental Inspector	Sustainability	
6/17/2025	Delimit and signpost protected areas	8/30/2025	Plant health	Agricultural services	
6/23/2025	Update planting statistics based on geographic information from protection zones	8/30/2025	Spreadsheets	Agricultural services	
9/1/2025	Update the POE for riparian zone management CD-SB-PO-12	9/30/2025	Environmental Inspector	Sustainability	
9/1/2025	Environmental training given by an expert in AVC and other conservation areas	9/30/2025	Sustainability	Management	
September 1, 2025	Update the differentiated management plan in accordance with technical guidelines CD-SB-PO-12 and UN-SB-PO-11	9/30/2025	Environmental inspector	Sustainability	



	9/1/2025	Design a module in the Environmental Plan that classifies riparian areas into: a. Natural. b. Artificial with an ecological function. c. Priority areas with defined dates for restoration and monitoring. d. Inclusion of these areas in the 2025-2030 Reforestation Plan with a focus on ecological restoration, recovery of native vegetation cover, and access control.	9/30/2025	Environmental Manager	Sustainability	
	September 1, 2025	Establish an annual monitoring system, through verification tours, GIS comparison, and progress reports on: a. Effective regeneration (indicator of living, dead, diseased, and damaged plants). b. Vegetation cover status. c. Results of intervention and maintenance in restored areas.	Over time	Environmental Manager	Sustainability	
	September 1, 2025	Train those involved (agricultural and engineering areas) in the Management and Monitoring Plan for the identified areas	9/30/2025	Environmental Manager	Sustainability	
<b>Date of Response</b>	27.06.2025					
<b>Audit Team Conclusion</b> (including any evidence reviewed)	<p>The plan was approved on 03/07/2025</p> <p>The company presents the following evidence for the closure of non-conformities:</p> <p>* A report is presented on actions taken to close finding 7.8.2. It details three actions implemented: a field survey of the affected areas, the inclusion of the artificial canal section of lot 152 (Palmas Adultas farm) in the Differentiated Management Plan, and the updating and prioritization of the 2025 reforestation plan. The survey increased the differentiated management area in lot 152 to 1.43 hectares and confirmed the need for reforestation in Limas San José (lot 1) and Malopi I (lot 12). The inclusion in the plan added 65 palms to the differentiated</p>					



	<p>management statistics for lot 152. Reforestation was carried out in July 2025, planting 363 native species in Lima San José and 200 in Malopi I, with a follow-up audit showing a 99% survival rate.</p> <p>* A document entitled Survey of Water Bodies and Areas with Ecological Connectivity UdC is presented. This document, dated August 2025, is a survey of water bodies and areas with ecological connectivity. It classifies water bodies into categories such as Artificial, Natural, Tributary, Swamp, Spring, and Rivers. The file includes maps and tables detailing current differentiated management and sites with future management. It summarizes that, within the 9,837 hectares of palm cultivation, 533 hectares are under current differentiated management and 930 hectares are designated for future differentiated management, representing 11% of the total palm cultivation area.</p> <p>* A document entitled Delimitation and Signage of Differentiated Management Plants is provided. This document, entitled Verification and Signage of New Differentiated Management Plants, describes the 2025 work plan for the verification, signage, and updating of cultivation statistics for plants under this management. It presents the 2025 Delimitation, Signage, and Update Plan, which schedules these activities on 17 farms (totaling 525 hectares) between August and December 2025. The file also includes supporting photographic evidence showing field verification of water bodies and palms physically marked with white bands to designate their differentiated management status.</p> <p>* The document entitled Updated Plantation Statistics - with Differentiated Management is presented. This document is a certification of approved information for APPLICATION III ROUND OF DIFFERENTIATED MANAGEMENT, YEAR 2025. It provides detailed planting statistics from Cukra Development Corporation, confirming a total of 192 plots with 533.01 hectares of planted area and 59,760 live palms under differentiated management. The tables specify data for the Differentiated Management Area versus the Non-Differentiated Management Area on various farms. The file also includes internal emails from August 2025 confirming these updated statistics (specifically correcting lots 74, 24, 62, and 63), required for the management of riparian areas in renovation projects.</p> <p>* A Procedure for the Delimitation and Protection of Riparian Areas, identified with the code CD-SB-PO-12, Version 2, last revised on August 4, 2025, is provided. The objective of the procedure is to ensure the protection, monitoring, and restoration of riparian areas at Cukra Development Corporation, in compliance with national legislation and the RSPO Standard. It defines key terms such as artificial canal with ecological function and establishes specific protection widths: 25 meters for canals, springs, and streams; 50 meters for main rivers and artificial lagoons; and 200 meters for natural lagoons. It assigns responsibilities for identification, field demarcation (with tape or paint), and differentiated management, prohibiting agrochemicals and fertilizers and requiring manual weed control.</p> <p>* Records of multiple Certificates of Attendance issued by BioAp S.A.S in Nicaragua in August 2025 are presented. These certificates confirm that several employees of CUKRA DEVELOPMENT CORPORATION S.A</p>
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	<p>attended the 9-hour virtual training course entitled Management and Monitoring of High Conservation Value Areas (HCV) and Riparian Strips.</p> <p>* The Water Resource Management Procedure, code UN-SB-PO-11, Version 2, revised on August 4, 2025, is evident. It applies to Cukra Development Corporation and Industrial Aceitera, with the aim of ensuring the proper management and conservation of water resources, including their use, reuse, and discharge. The procedure details the identification of water bodies and establishes differentiated management zones, including 25 meters for artificial channels with ecological function, springs, and streams; 50 meters for main rivers and artificial lagoons; and 200 meters for natural lagoons. It also details the management of supply sources, such as the restriction of agrochemicals to 100 meters from wells, and procedures for managing industrial wastewater and domestic sewage.</p> <p>* S presents an Excel document entitled Reforestation Plan 2025-2030 - Reforestation Plan. This document presents the Reforestation Plan for sites with ecological connectivity for the period 2025-2030, covering 13 farms. The plan details a total goal of 33,199 plants at a density of 200 per hectare. For the year 2025, the planting of 4,856 plants was scheduled (P) and the planting of 2,417 was executed (R), achieving 50% compliance for that period.</p> <p>* Record of reforestation evidence 2025. This file provides photographic and descriptive evidence of the reforestation activities carried out in July 2025 as part of the annual plan. It details the intervention at the Lima-San José Farm (lot 1), where 363 native species (23 varieties) were planted on 1 hectare, and at the Malopi I Farm, where 200 native species (18 r varieties) were planted on 0.7 hectares. The report mentions key species used, such as mountain almond, mahogany, waterwood, river guásimo, and red mangrove, in order to restore fragmented riparian ecosystems.</p> <p>* An Excel document entitled Reforested Site Monitoring Plan - Reforestation Plan is provided. This document details the Reforested Site Monitoring Plan for the period 2025-2030, covering the 13 farms in the reforestation plan (164.7 hectares and 33,199 plants). It establishes the frequency (bimonthly, quarterly, semi-annually) of six key monitoring activities: Identification of areas, Weed control and removal (manual), Pest control (biological/manual), Plant replacement (replanting), Survival monitoring (% of survival) and Wildlife monitoring.</p> <p>* Evidence of monitoring of reforested sites is presented. This file is a Record of Audits of Forested Plants (CD-SB-RE-17) dated July 30, 2025. The monitoring was carried out at the Lima San Jose Farm (lot 1) and Malopi I (lot 12), reporting that of 363 plants in the former, 363 were alive, and of 200 in the latter, 198 were alive. The observation concludes an overall survival rate of 99%, reflecting an appropriate selection of adapted native species, and includes photographs of the growing plants.</p> <p>* Records of Certificates of Attendance issued by BioAp S.A.S in August 2025 are presented. These certify that eleven employees of CUKRA DEVELOPMENT CORPORATION S.A attended the 9-hour virtual training course entitled Management and Monitoring of High Conservation Value (HCV) Areas and Riparian Strips.</p>
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	The evidence is accepted and the non-conformity is closed on 05.11.2025.
<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
<b>Date of Closure:</b>	05.11.2025

<b>Indicator Number</b>	7.10.1(C)
<b>Nonconformity Number</b>	19
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<b>Non-Conformity Statement:</b>	



The greenhouse gas reduction plan has not been publicly reported.

The document review showed that the company has a database containing the information it has entered into the calculator and has made GHG emissions estimates. Before and during the audit, the company was unable to share the link with the auditor to review and approve the calculator due to a user-related error, so the calculator was reviewed from the company's account and could not be approved. Based on the results obtained from the GHG emissions estimate, the company developed a GHG reduction plan; however, this plan has not been published by the company.

**Evidence:**

- GHG reduction plan
- Review of the PalmGHG calculator

**Root Cause Analysis**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The greenhouse gas reduction plan has not been publicly reported	Because it was not known that this had to be made public	It was thought that it was sufficient to make the calculation in PalmGHG and send it to the EC	None of the training received had mentioned that the Plan should be available to any interested party	Furthermore, this does not make much sense because few people can understand what GHG emissions are all about	
2. Environment						



	3. Material/Raw Material							
	4. Method	The greenhouse gas reduction plan has not been publicly reported	Because no official channel or deadline for its publication had been established after its preparation	Because the public disclosure of such a plan was not written into a procedure	Because the environmental communication strategy only discussed what GHGs were, but not the actions contemplated, as it was thought to be too specialized a topic to share with communities and other stakeholders	Because the company prioritized the technical development of the plan but did not include a socialization or communication stage	Because the environmental management approach to calculating and reducing GHG emissions has focused mainly on technical and regulatory compliance, concentrating on priority issues such as waste management, species conservation, riparian areas, and impacts.	
	5. Machinery/Equipment							
	6. Measurement							
<b>Correction(s)</b>		1. Creation of a new user on the GHG calculator platform, which will allow direct access to the auditor for review and approval of the document.						



<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<b>Action Plan (Implement actions)</b>					
	Start Date	Action	End Date	Names of those responsible		% progress
				To do	Verify	
	6/16/2025	Include in the GHG Plan the method for publishing PalmGHG calculator results and share the reduction plan during training sessions scheduled by the environmental department.	8/16/2025	Environmental Manager	Sustainability	
6/16/2025	Create a user profile on the GHG calculator platform, allowing temporary access to auditors during internal or external assessments, ensuring traceability and transparency and guaranteeing approval of emissions calculations.	8/16/2025	Sustainability Manager	Sustainability		
6/16/2025	Prepare the document to be published in an educational format	August 31, 2025	Sustainability Manager	Sustainability		
<b>Date of Response</b>	27.06.2025					
<b>Audit Team Conclusion</b> <i>(including any evidence reviewed)</i>	<p>The plan was approved on 07/03/2025.</p> <p>The company presents the following evidence for the closure of non-conformities:</p> <p>* A chain of emails from August 2025 is presented. On August 14, approval is requested for Cukra Development Corporation's GHG emission calculation for 2024, which is 1.25 tCO<sub>2</sub>e/tCPO, and it is informed about the creation of its user for the RSPO platform. On August 19, Zoyla Vargas responds by approving the calculation and requesting that it be uploaded to the RSPO platform.</p> <p>* An email dated August 14, 2025, is provided, informing about the creation of a new user for the RSPO platform and attaching Cukra Development Corporation's GHG calculation for 2024 for review and approval. In its</p>					



	<p>response, the RSPO approves the 2024 GHG emissions calculation, which amounts to 1.25 tCO<sub>2</sub>e/tCPO, and requests that it be uploaded to the RSPO platform.</p> <p>* GHG Work Plan - Generation Sources is presented. This file details the sources of greenhouse gas generation for two entities. For CDC (Cukra Development Corporation), the sources identified are Energy Use, Fertilizer Use, and Fossil Fuel Consumption. For IARAAS, the sources listed are Energy, Fuel (Combustible), and POME. The plan details a schedule of activities from January 2024 to December 2025, scheduling the disclosure of the reduction plan, monthly monitoring of indicators, analysis, and presentation of results.</p> <p>* A training record dated September 1, 2025, is presented, showing the dissemination of the GHG reduction plan, with code UN-SB-RE-08. The event was attended by staff from Cukra Development Corporation and Industrial Aceitera de la RAAS. Topics covered included the concept of GHG, sources of emissions in the company, and key strategies of the reduction plan.</p> <p>Evidence shows that the plan is shared through the website <a href="https://cukra.online.com.ni/">https://cukra.online.com.ni/</a>, in the newsletter and company email, and is communicated in induction sessions through a PowerPoint presentation.</p> <p>The evidence is accepted and the non-conformity is closed on 05.11.2025</p>
<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open
<b>Date of Closure:</b>	05.11.2025

<b>Indicator Number</b>	7.12.8(C)
<b>Nonconformity Number</b>	20
<b>Nonconformity Category</b>	<input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b></p> <p>The company does not have a remediation and compensation plan approved by the RSPO.</p> <p>During the document review, it was verified that the company obtained approval of the <i>Concept Note</i> on 07/16/24. Subsequently, it formulated the <i>Remediation and Compensation Plan</i> on November 18, 2024, which was submitted to the RSPO on August 24, 2024, as part of its responsibilities for land use change. However, at the time of the audit, there was no evidence of formal approval of the remediation and compensation plan by the RSPO.</p>	
<p><b>Evidence:</b></p> <ul style="list-style-type: none"> <li>- Communication with RSPO, emails approving the concept note and sending, receiving, and following up on the approval of the remediation and compensation plan.</li> <li>- Concept note.</li> </ul>	



- Remediation and compensation plan

Root Cause Analysis	Analyze: What are the causes and why?						
	Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The company does not have a remediation and compensation plan approved by the RSPO	Because the RSPO lacks permanent reviewers for the timely review of Concept Notes and Remediation and Compensation Plans	There are differences in criteria, and what one reviewer says should be removed, another says is missing, which delays the review process	There is no real commitment to the published review times, and the RSPO only sends an email apologizing for the delay, but there is no awareness of the impact			
2. Environment							
3. Material/Raw Material							
4. Method	The company does not have a remediation and compensation plan approved by the RSPO	Because the RSPO review and feedback process is slow and has not yet been formally completed	Because it is still in the evaluation stage and no formal communication of final	Because the plan is being reviewed by an independent evaluator who is not accessible,	Because the RSPO lacks sufficient paid staff to carry out formal review work on its Panel, and only	Because there is no awareness of the impact	



				acceptance has been received	in order to apply pressure	at the end of the process does it seek an independent third party, which is not required to meet response deadlines																					
	5. Machinery/E quipment																										
	6. Measuremen t																										
<b>Correction(s)</b>	1 Sending of email and formal letter to the RSPO Compensation Department, setting out the chronology of our application, requesting status and a date for approval of the Remediation and Compensation Plan.																										
<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #333; color: white;"> <th colspan="6">Action Plan (Implement actions)</th> </tr> <tr style="background-color: #ccc;"> <th rowspan="2">Start Date</th> <th rowspan="2">Action</th> <th rowspan="2">End Date</th> <th colspan="2">Names of those responsible</th> <th rowspan="2">% progress</th> </tr> <tr style="background-color: #ccc;"> <th>To do</th> <th>Verify</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>							Action Plan (Implement actions)						Start Date	Action	End Date	Names of those responsible		% progress	To do	Verify						
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Start Date	Action	End Date	Names of those responsible		% progress																						
			To do	Verify																							



	07/16/2025 5	Send proof of approval of the Remediation and Compensation Plan issued by the RSPO Remediation and Compensation Panel	08/15/2025	Sustainability Manager	Sustainability Management	
<b>Date of Response</b>	18.07.2025					
<b>Audit Team Conclusion</b> <i>(including any evidence reviewed)</i>	<p>The plan has been approved for implementation on 07/31/2025.</p> <p>The company presents the following evidence for the closure of non-conformities:</p> <ul style="list-style-type: none"> <li>* Evidence of an email chain between the RSPO Secretariat and Cukra Development Corporation. It begins with an email dated August 15, 2025, acknowledging receipt of Cukra's Remediation and Compensation Plan (RaCP) submission. It concludes with an email dated September 26, 2025, in which the RSPO R&amp;C Panel notifies the approval of the RaCP submission (Ref: RaCP/0002/2025) and attaches the formal assessment report.</li> <li>* A formal letter dated August 15, 2025, signed by the Sustainability Manager of Cukra Development Corporation, is submitted to the RSPO R&amp;C Panel. In the letter, the company formally requests the assessment of its Remediation and Compensation Plan (RaCP) under the RSPO Remediation and Compensation Procedure (2020), declaring that the information provided is accurate and committing to abide by the Panel's decision.</li> <li>* The RaCP Assessment Report (RaCP/0002/2025) for Cukra Development Corporation is presented, with a panel decision date of September 25, 2025. The RSPO R&amp;C Panel approves the submitted RaCP, confirming the company's responsibility for 150.45 hectares of land clearing without prior VCA assessment between 2005 and 2007. The panel approves the compensation plan proposed by the company, which consists of the restoration and protection of 150.45 hectares of suitable area within its properties, the implementation of which will be verified through annual progress reports and surveillance audits.</li> </ul> <p>The evidence is accepted and the non-compliance is closed on 05/11/2025.</p>					
<b>Status of Nonconformity</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open					
<b>Date of Closure:</b>	05.11.2025					



<b>Indicator Number</b>	2.1.2
<b>Nonconformity Number</b>	2
<b>Nonconformity Category</b>	<input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> <i>(when more than one site/member):</i> N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b></p> <p>There is no evidence of due legal diligence on the part of contracted third parties. The company has a Contractor Service procedure with code UN-FN-PO-01 and issue date of May 15, 2025, whose objective is to establish a standard methodology for the selection, hiring, supervision, and evaluation of contractors, ensuring compliance with the legal, safety, quality, environmental, and cost requirements established by the organization. However, this procedure is limited solely to the selection and hiring stages, without clearly and structurally addressing supervision, evaluation, and legal due diligence activities.</p> <p>During the due diligence verification, it was identified that, although the company conducts an initial review of its commercial relationship with its contractors, it does not have a methodology in place to ensure their ongoing compliance with legal requirements. In particular, deficiencies were identified in the monitoring of some contractors during 2024 and 2025:</p>	



**Evidence:**

**1. Norge Guzmán – Transportation of personnel Zone A:**

- A safety inspection of the contractor's vehicle carried out by the company on April 3, 2025, is presented, identifying two safety violations. No documented evidence is presented indicating the actions taken in response to these findings.
- No evidence of payments to the INSS for the years 2024 and 2025 is presented.
- The emissions certificate has a test date of May 27, 2025, which is after the review carried out during this audit.

**2. Rosa Méndez – Factory staff transport:**

- There is no evidence of vehicle inspections by the company during 2024 and 2025.

**3. ARMOL – Oil transport:**

- Driver José Gabriel Vallecillo's license expired on November 11, 2023. In the case of driver Leandro Fernández, the document provided does not allow for verification of the license's validity.

There are no records of vehicle inspections carried out by the company to verify their safety conditions.

**Root Cause Analysis**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	There is no evidence of due legal diligence on the part of third-party contractors, as the current procedure does not clearly and systematically cover the phases of supervision, evaluation, or ongoing legal verification of contractors.	Because continuous legal monitoring of contractors is not carried out	Because the personnel responsible do not have clear guidelines for carrying out such supervision	Because the current procedure only covers selection and hiring, not supervision or evaluation	Because its design did not incorporate an operational phase that articulates monitoring throughout the contractual relationship.	Because it was assumed that initial verification was sufficient, without considering the risks associated with the legal continuity of the service.
2. Environment						



	3. Material/Raw Material						
	4. Method	The contractor management procedure was developed using a partial methodology that prioritized the initial stages of selection and onboarding, without integrating a systematic structure for ongoing legal monitoring	Because the established procedure does not include an operational methodology for post-contracting legal supervision and evaluation	Because it was designed to focus solely on the selection and onboarding processes, omitting subsequent legal compliance management	Because no analysis of the life cycle of the relationship with contractors was carried out when the procedure was developed	Because risk management tools and regulatory approaches that would have identified the need for ongoing due diligence were not used.	Because the methodological approach applied was limited and did not incorporate good compliance practices or references to applicable regulatory standards
	5. Machinery/Equipment						
		The absence of a culture of evaluation	Because there are no	Because a monitoring	Because current	Because the legal dimension	Because there is no



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	7/21/2025	Train internal staff responsible for the process and active contractors.	7/31/2025	Area managers	Controller	
	August 1, 2025	Apply the new criteria in all hiring processes	Ongoing	Comptroller	General Management	
	August 1, 2025	Conduct internal evaluations of contractor compliance to detect deviations, apply corrective measures, and ensure compliance throughout the business relationship.	Ongoing	Department heads	Controller	
	August 1, 2025	Annually audit and document compliance with legal, labor, tax, occupational safety, and environmental obligations through a formal review of current records and permits.	Ongoing	Controller	General Management	
<b>Date of Response</b>	27.06.2025					
<b>Audit Team Conclusion</b> (including any evidence reviewed)	The plan was approved on July 3, 2025, and its implementation will be reviewed in the next ASA1 follow-up audit.					
<b>Status of Nonconformity</b>	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Open					
<b>Date of Closure:</b>	-					



<b>Indicator Number</b>	3.3.2
<b>Nonconformity Number</b>	3
<b>Nonconformity Category</b>	<input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> (when more than one site/member): N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b></p> <p>There are deficiencies in the mechanism used by the company to verify systematic implementation of standard operating procedures.</p> <p><b>Extraction Plant – Occupational Health and Safety</b></p> <p>The company has determined that compliance with the implementation of operating procedures associated with high-risk tasks is verified through the use of work permits, specifically for activities at height, in confined spaces, and involving hazardous energy. However, during the review of the records corresponding to work activities at height, inconsistencies were identified that reveal deficiencies in the control and application of these permits:</p> <ol style="list-style-type: none"> <li>1. Two different formats are used to authorize work at height:             <ul style="list-style-type: none"> <li>○ The form entitled "Permit for Supervised Work at Height," code IA-SO-PO-29-23, was completed on 05/23/2025 to authorize two different tasks.</li> <li>○ The form entitled "Permit for Work at Height," code IA-CH-RE-21, was completed on 05/24/2025.</li> </ul> </li> </ol>	



2. The reviewed permits do not include the requirements established in the Safe Work at Heights Procedure UN-CH-PO-10 V3, dated 04/29/2025, regarding the evaluation before, during, and after the execution of the task.

Non-compliance with the implementation of the following operating procedures for the agricultural area and extraction plant was verified:

- Empty palm fruit bunches are not being managed in accordance with the provisions of the Procedure for the transfer, distribution of fiber and pinzote in the field, code CD-SA-PO-18, Version 1 dated 1/15/2025.

According to representatives of the agricultural area, the bundles of empty bunches are left for 30 to 40 days and then applied to the plants, which is not described in the procedure. Furthermore, the procedure in section 6 on environmental impact indicates that this work does not pose a significant risk to the environment. However, during the tour of lot 12 of the Malopi 1 farm, it was observed that the mounds or bundles of empty palm bunches are placed at the top of the water's edge and that the leachates are flowing directly into the water.

- Chemicals and agrochemicals are not being managed in accordance with the provisions of the Procedure for expired chemical products, code IT-CM-AL-1, Version 01, which states that once expired, they should not be applied. During the tour of the central agrochemical warehouse and review of inventories, it was found that there are 6,015.83 kg of the herbicide Arrasador 75.4% SG, which expired on March 9, 2025. Applications have been made and it is planned to continue applying this product until it is completely used up.

- During a tour of the extraction plant, a shelf identified as "Expired Product" was found in the Lubricant and Grease Warehouse area, containing a large quantity of product that expired in March 2020.

In the laboratory, there is also a shelf labeled "Expired Reagents" and three jars of pH 10.01 Buffer product that expire in 05/2025 and are full.

Those interviewed stated that these products will be managed by an external manager; however, there is no evidence that this supplier has been contracted or that a plan for final disposal has been established.

**Evidence:**

**Extraction Plant**

- Permit for Supervised Work at Height, code IA-SO-PO-29-23
- Permit for Work at Heights, code IA-CH-RE-21
- Safe Work Procedure at Heights UN-CH-PO-10 V3, act 04/29/2025

- Procedure for the transfer and distribution of fiber and pinzote in the field, code CD-SA-PO-18, Version 1 dated 01/15/2025.
- Procedure for expired chemical products, code IT-CM-AL-1, Version 01.

- Tour of the extraction plant.

Root Cause Analysis	Implementation of POE work at height					
	Analyze: What are the causes and why?					
	Category	Root cause	Why 1	Why 2	Why 3	Why 4
1. Labor	The staff responsible for handling permits are aware of the updated version, but the correct format is not always used.	Because the SSO manager has the updated documentation, but it was not correctly applied when authorizing the work	Because there is a lack of supervision regarding the correct implementation of procedures when filling out permits	Because the forms were not thoroughly reviewed before being used for work authorizations		
2. Environment						
3. Material/Raw Material						



	4. Method	The process of reviewing and applying permits is neither rigorous nor formally controlled	Because the procedure is not fully integrated into the work process in an effective manner	Because permits do not include the requirements established in the Safe Work at Heights Procedure, such as pre-, during, and post-assessment	Because there is no standardized protocol for verifying compliance with these procedures		
	5. Machinery/ Equipment						
	6. Measurement	The lack of a rigorous work permit tracking system prevents inconsistencies from being identified in a timely manner	Although audits and reviews exist, they are not specific enough to verify the correct application of work permits	Because there is no accurate measurement that allows for real-time evaluation of compliance with the procedure	Because this requirement is not included in the internal OHS audit plan		
<b>Implementation of POE fiber distribution in the field</b>							
<b>Analyze: What are the causes and why?</b>							
	<b>Category</b>	<b>Root cause</b>	<b>Why 1</b>	<b>Why 2</b>	<b>Why 3</b>	<b>Why 4</b>	<b>Why 5</b>



	1. Labor						
	2. Environment	Inappropriate management of palm fiber	Because the procedures do not include any restrictions on the disposal of pinzote fiber near water sources	Because no plan has been implemented to demarcate agricultural plots	Because the disposal of pinzote fiber has been viewed from the perspective of improving productivity rather than environmental protection		
	3. Material/Raw Material						
	4. Method	Pinzote fiber is not being managed in accordance with procedure CD-SA-PO-18	Because the procedure does not take into account the days from placement to distribution in the plants	Because work was being carried out based on verbal instructions rather than procedural ones			
	5. Machinery/Equipment						



6. Measurement						
<b>Expired agrochemicals and chemicals Cukra</b>						
<b>Analyze</b> What are the causes and why?						
Category	Fundamental cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The personnel responsible for inventory control did not manage agrochemicals nearing expiration in a timely manner due to a lack of clear assignment of responsibilities.	Because the personnel in charge of inventory planning and control did not adequately monitor the product's expiration date	Because there is no systematic practice of periodically reviewing critical dates in the inventory by warehouse managers and product users	Because roles and responsibilities are not clearly defined or assigned for the preventive management of expired chemicals and agrochemicals	Because the current procedure does not establish early warning mechanisms or protocols for scheduled review of expiry dates with the involvement of operational staff	Because there has been no culture of proactive inventory management or specific training for personnel on the importance of timely use of agrochemicals according to their shelf life, which has led to a reactive rather than preventive attitude



	2. Environment						
	3. Material/ Raw Material	The company has prioritized the use of expired agrochemical inventory for economic reasons, due to a perception of remaining product utility, which has led to its use without consideration of the procedure for expired chemicals.	Because there is a considerable amount (6,015.83 kg) of expired Arrasador herbicide and it has been decided to continue using it under the technical recommendation of the supplier.	Because the product is perceived to still be effective and its expiration before 6 months is not considered to pose a risk.	Because the supplier's technical recommendation indicates that there is no risk of loss of efficacy, and this has been observed in practice.	Because no visible negative results have been observed after its application and there is no technical analysis that expressly prohibits its use due to loss of effectiveness	
	4. Method	There is no procedure that covers all the variables involved in handling expired chemical products in different areas	Because a procedure was taken as a reference that does not reflect the reality of the operation				
	5. Machinery/Equipment						
		There is no preventive	Because the product was	Because there is no system for	Because no indicators or	Because inventory	Because there is no



6. Measurement	monitoring based on indicators, nor are there measurement and alert systems that allow for the identification of products nearing expiration, which prevents proactive and timely inventory management.	not detected as expired in time, as there is no active alert or control over expiration dates in use.	monitoring or measuring key indicators in inventory management, such as "products nearing expiration."	review frequencies have been defined for monitoring critical inventory conditions	management is not integrated into a structured data measurement and analysis system that allows for preventive decisions	organizational culture oriented toward the use of data and indicators to anticipate operational risks, such as the expiration of products and supplies
<b>Expired chemicals Extractor</b>						
<b>Analyze</b> What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The personnel responsible for inventory control did not manage chemicals nearing expiration in a timely manner due to a lack of clear assignment of responsibilities.	Because the personnel in charge of the warehouse and laboratory did not adequately monitor the expiration dates of the products	Because there is no systematic practice of periodically reviewing critical dates in the inventory by those responsible for the warehouse	Because roles and responsibilities are not clearly defined or assigned for the preventive management of chemical product expiration	Because the current procedure does not establish early warning mechanisms or protocols for scheduled review of expiry dates with the	Because there has been no culture of proactive inventory management or specific training for personnel on the importance of timely use of chemicals



			and users of the products		involvement of operational staff	according to their shelf life, which has led to an accumulation of expired and expiring products
2. Environment						
3. Material/Raw Material	The company does not have an inventory control system based on expiration dates or internal procedures to ensure the timely rotation and use of chemicals.	Because there was no timely rotation or adequate planning for their use before the expiration date	Because there are no inventory controls that prioritize the use of products nearing expiration (FIFO system).	Because there is no internal procedure regulating the handling of materials by expiration date or prior alerts for their management	Because the operational and economic risk associated with the expiration of chemical products has not been considered, treating them only as waste to be disposed of	Because the management of expired chemicals has not been integrated into an inventory planning and control system, leading to accumulation, obsolescence, and delays in final disposal
4. Method						
5. Machinery/Equipment						



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Correction(s)	<p><b>Implementation of POE for working at heights</b></p> <ol style="list-style-type: none"> <li>1. Review and correction of the standardized "Permit to Work at Height" form, aligned with corporate procedure UN-CH-PO-10 V3, with the required fields: prior risk assessment, signature of the person responsible for execution, validation by the person responsible for safety, and control of personal protective equipment (PPE)</li> <li>2. Immediate training for OHS personnel responsible for authorizing work at height, ensuring that they understand all aspects of the updated format</li> </ol> <p><b>Implementation of POE fiber distribution in the field</b></p> <ol style="list-style-type: none"> <li>1. Update fiber handling procedure</li> <li>2. Do not lay fiber optic cable on slopes greater than 10% or near water sources (sites with differentiated management)</li> </ol> <p><b>Expired agrochemicals and chemicals Cukra</b></p> <ol style="list-style-type: none"> <li>1. Create a plan for the application of expired herbicide to be used in 2025 (June-September)</li> </ol> <p><b>Expired chemicals Extractor</b></p>							



	1. Request removal of expired products from inventory to proceed with requesting their destruction by an authorized external manager																																														
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	6/17/2025	Update the procedure for handling pinzote fiber based on actual field practices and with actions that guarantee environmental conservation.	7/31/2025	Plant health	Agricultural services	
	June 17, 2025	Include in the pinzote fiber handling procedure the time elapsed from when the bale is left until distribution by plant (maximum 40 days).	7/31/2025	Plant health	Agricultural services	
	6/17/2025	Define a list of sites where pinzote fiber will be available, taking into account the presence of rivers, hamlets, and topography.	7/31/2025	Plant health	Agricultural services	
	June 17, 2025	Create a database of locations where pinzote fiber is available: farm, plot, UMA	7/31/2025	Plant health	Agricultural services	
<b>Expired agrochemicals and chemicals Cukra</b>						
<b>Action Plan (Implement actions)</b>						
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6/19/2025	Dispose of expired products in the extractor with an authorized waste manager	7/31/2025	Warehouse	Management																																	
6/19/2025	Create and socialize a procedure that contemplates the comprehensive chemical management system in the extraction plant.	7/15/2025	Warehouse	Management																																	
6/19/2025	Create inventory with expiration dates	7/15/2025	Warehouse	Management																																	
<b>Date of Response</b>	27.06.2025																																				
<b>Audit Team Conclusion</b> (including any evidence reviewed)	The plan was approved on July 3, 2025, and its implementation will be reviewed in the next ASA1 follow-up audit.																																				
<b>Status of Nonconformity</b>	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Open																																				



<b>Date of Closure:</b>	-
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<b>Indicator Number</b>	6.5.4
<b>Nonconformity Number</b>	13
<b>Nonconformity Category</b>	<input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> <i>(when more than one site/member):</i> N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>          There is no evidence of compliance with the Petitions, Complaints, Claims, Acknowledgments, Suggestions (PQRS) procedure in some of the worker complaints reviewed.          There is evidence of another anonymous complaint dated 02/28/24 that was received by mail, remained open for 174 days, was closed on August 20, 2024, and evidence that the Social Manager posted on the bulletin board each month that it was still under investigation. The resolution was "dismissed due to lack of evidence."</p>	



An additional complaint was received anonymously for the same reason via mailbox on 03/07/2024, closed on August 20, 2024. It was noted that the Social Manager posted on the bulletin board each month that the investigation was continuing. The resolution was "dismissed for lack of evidence."

Another additional complaint arrived via email "webgruponumar@gruponumar.com" on 04/14/2024 anonymously regarding a similar situation in the same area of the company, but with more information regarding the situations presented. The latter was closed on August 23, 2024.

There is no evidence of any action taken between February 28, 2024, when the first complaint was filed, and March 7, 2024, when the second complaint was filed. The only evidence is that the process began after the anonymous complaint was received by email again on April 14, 2024.

**Evidence:**

- Procedure for Petitions, Complaints, Claims, Acknowledgments, Suggestions (PQRS)
- Complaints mechanism database

**Root Cause Analysis**

Analyze: What are the causes and why?						
Category	Fundamental cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	Inefficient management of anonymous PQRS	Lack of awareness among staff responding to PQRS about the importance of providing a timely response	Because they often believe it is a matter of gossip and not something that affects productivity	Because users also use the mechanism to vent about issues that bother them, but they do not provide evidence, which hinders the investigation process	Because the social manager cannot know whether what they are receiving is true or not, and it becomes an unfounded PQRS (due to lack of evidence)	Objectivity is lost and the PQRS becomes a subjective position between two people (the complainant and the accused).



	2. Environment	Inefficient management of anonymous PQRS	Because anonymity generates more confidence for the complainant, but makes it difficult for the social manager to raise the issue and find a solution.	Because by hiding behind anonymity, there is no way to talk to a specific person who can present evidence.	The proper channels are not followed, perhaps for fear of reprisals from the accused	A climate that allows for adequate feedback has not been created	Nor has an efficient mechanism been established for conducting an objective investigation
	3. Material/Raw Material	Inefficient management of anonymous PQRS	Because the format designated for investigating cases that violate the Code of Ethics has not been used	There has been a lack of training and commitment in this regard			
	4. Method	Inefficient management	Because the staff	Because its content was	Because there was no	Because they did not	Because clear



		of anonymous PQRS	responsible for responding did not appreciate the importance of the mechanism in the face of anonymous complaints without evidence, which led to a low prioritization of the response	underestimated due to the lack of evidence, which delayed the start of investigative actions	active follow-up or documentation of internal management in accordance with established procedures	clearly assume their role within the PQRS protocol and did not understand the importance of recording each stage of the process as part of the required traceability	operational controls and periodic follow-ups were not established to ensure compliance with the recording and traceability defined in the procedure, which weakened its application in practice
	5. Machinery/ Equipment						

	<table border="1"> <tr> <td data-bbox="685 296 842 882">6. Measurement</td> <td data-bbox="842 296 1048 882">Inefficient management of anonymous PQRS</td> <td data-bbox="1048 296 1245 882">Because sometimes quantity does not imply quality. In the particular case of the PQRS, it was a single person who wrote many times about the same subject (with the same spelling mistakes), which diminished the importance of that PQRS</td> <td data-bbox="1245 296 1449 882">Because it became a personal issue that was far removed from work.</td> <td data-bbox="1449 296 1632 882"></td> <td data-bbox="1632 296 1805 882"></td> <td data-bbox="1805 296 1989 882"></td> </tr> </table>	6. Measurement	Inefficient management of anonymous PQRS	Because sometimes quantity does not imply quality. In the particular case of the PQRS, it was a single person who wrote many times about the same subject (with the same spelling mistakes), which diminished the importance of that PQRS	Because it became a personal issue that was far removed from work.											
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<b>Correction(s)</b>	<ol style="list-style-type: none"> <li>1. Hold a meeting with department heads to remind them of the importance of responding appropriately to PQRS in their areas and processes, in a timely manner and with the required solid evidence, so that the system does not lose credibility</li> <li>2. Add the PQRS received on February 28 and March 7, 2024, to the 2024 PQRS database.</li> <li>3. Collect management support provided after those dates (emails requesting intervention from corporate HR).</li> </ol> <p>Share evidence demonstrating the actions in the previous paragraphs.</p>															
<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<table border="1"> <thead> <tr> <th colspan="5" data-bbox="685 1254 2007 1315">Action Plan (Implement actions)</th> </tr> <tr> <th data-bbox="685 1315 860 1378">Start Date</th> <th data-bbox="860 1315 1400 1378">Action</th> <th data-bbox="1400 1315 1550 1378">End Date</th> <th data-bbox="1550 1315 1901 1378">Names of those responsible</th> <th data-bbox="1901 1315 2007 1378"></th> </tr> </thead> <tbody> <tr> <td data-bbox="685 1378 860 1386"></td> <td data-bbox="860 1378 1400 1386"></td> <td data-bbox="1400 1378 1550 1386"></td> <td data-bbox="1550 1378 1901 1386"></td> <td data-bbox="1901 1378 2007 1386"></td> </tr> </tbody> </table>	Action Plan (Implement actions)					Start Date	Action	End Date	Names of those responsible						
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Start Date	Action	End Date	Names of those responsible													



			To do	Verify	% progress	
	6/18/2025	Hire a third party to strengthen the efficient management of requests, complaints, claims, and suggestions, to improve the user experience, strengthen transparency, and support decision-making based on feedback.	7/18/2025	Cukra Sustainability	Sustainability Management	
	7/7/2025	Submit a monthly report to management that includes: number of PQRS by type, status of each case (open, in progress, closed), response times, critical cases, and analysis of recurring causes	7/15/2025	Social Manager	Sustainability	
	6/30/2025	Establish that, after 15 days without evidence of action on a PQRS, the social manager shall notify the person responsible of the need to review the case in order to take action before reaching the 30-day limit.	7/15/2025	Social Manager	Sustainability	
	7/31/2025	Modify the PQRS Procedure in accordance with the new guidelines	July 15, 2025	Management	Sustainability	
	7/31/2025	Promote the PQRS System through the Resguarda platform	August 31, 2025	All	Sustainability	
	7/31/2025	Assess understanding by managers and users through a sample survey	8/31/2025	Social Manager	Sustainability	
<b>Date of Response</b>	27.06.2025					



<b>Audit Team Conclusion</b> <i>(including any evidence reviewed)</i>	The plan was approved on July 3, 2025, and its implementation will be reviewed in the next ASA1 follow-up audit.
<b>Status of Nonconformity</b>	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Open
<b>Date of Closure:</b>	-

<b>Indicator Number</b>	7.1.2
<b>Nonconformity Number</b>	14
<b>Nonconformity Category</b>	<input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> <i>(when more than one site/member):</i> N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<b>Non-Conformity Statement:</b>	



The identified invasive species are not being managed throughout the certification unit.

The company has a manual cleaning procedure for oil palms, code CD-SA-PO-01, Version 2 dated February 7, 2025. It indicates that invasive species are monitored every two months; however, this monitoring is only carried out on plots that have kudzu and mucuna (plots 45 and 233) that are less than five years old.

To identify the invasive species on these plots, only the CABI list has been used as a reference.org has been used as a reference, and the Global Invasive Species Database has not yet been considered. Furthermore, the identification and management measures for invasive species are focused only on plots 45 and 233, which are less than 5 years old, and management activities for these species present in other areas of the plantation have not yet been identified and defined.

During the tour of plot 42, which borders the steep slope area that has been left for conservation, it was observed that kudzu has spread beyond the plantation and is now present in that area. The same was observed on the Wari farm, where kudzu has spread beyond the palm plantation and is now present in the riparian zone.

**Evidence:**

- Manual cleaning procedure for oil palm, code CD-SA-PO-01, Version 2 dated 7/2/2025.
- Field surveys
- Review of monitoring records for plots with invasive species CD-SA-RE-60 Version 2 dated February 7, 2025.

**Root Cause Analysis**

Analyze: What are the causes and why?						
Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
1. Labor	The personnel responsible for controlling invasive species are unaware of the species listed by CABI and the Global Database, as well as the methodology	Because the personnel responsible have not received specific training or technical updates on international reference	Because there is no structured continuing education program for personnel responsible for	Because invasive species management has not been prioritized as a strategic line within the annual	Because it has been assumed that prior knowledge of kudzu and mucuna was sufficient to implement invasive	Because there is no corporate culture oriented toward systematic technical updates on the management



	established by the company	lists or internal management procedures	invasive species management	weed control plan	species control actions	nt of invasive plants from an environmental management perspective
2. Environment						
3. Material/Raw Material						
4. Method	The personnel responsible for controlling invasive species are unaware of the species listed by CABI and the Global Database, as well as the methodology established by the company	Because there is no clear guide or practical method indicating what to do with each species	Because the company has only focused on controlling kutzú and mucuna, without extending the method to other species	Because the current procedure does not include specific instructions for the rest of the species or conservation areas on the farm	Because the procedure has not been updated or adapted based on the requirements of the standard.	Because it had not been considered or adjusted as necessary
5. Machinery/Equipment						



	<table border="1"> <tr> <td data-bbox="685 290 969 435">6. Measurement</td> <td data-bbox="969 290 1189 435"></td> <td data-bbox="1189 290 1359 435"></td> <td data-bbox="1359 290 1500 435"></td> <td data-bbox="1500 290 1659 435"></td> <td data-bbox="1659 290 1830 435"></td> <td data-bbox="1830 290 1989 435"></td> </tr> </table>	6. Measurement																															
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<b>Correction(s)</b>	<ol style="list-style-type: none"> <li>Gain a better understanding of invasive species based on the CABI list and the Global Invasive Species Database</li> <li>Provide training, send the training record and album used as training material on the CABI list and the Global Invasive Species Database</li> </ol> <p>Share the written evaluation of the training on the CABI list and the Global Invasive Species Database</p>																																
<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<table border="1"> <thead> <tr> <th colspan="6" data-bbox="685 676 1995 735">Action Plan (Implement actions)</th> </tr> <tr> <th data-bbox="685 735 898 855" rowspan="2">Start Date</th> <th data-bbox="898 735 1328 855" rowspan="2">Action</th> <th data-bbox="1328 735 1469 855" rowspan="2">End Date</th> <th colspan="2" data-bbox="1469 735 1883 786">Names of those responsible</th> <th data-bbox="1883 735 1995 855" rowspan="2">% progress</th> </tr> <tr> <th data-bbox="1469 786 1675 855">To do</th> <th data-bbox="1675 786 1883 855">Verify</th> </tr> </thead> <tbody> <tr> <td data-bbox="685 855 898 1075">6/23/2025</td> <td data-bbox="898 855 1328 1075">           Define the POE and its records to ensure the proper management of invasive species and voluntary palms             Make key for controlling invasive species in riparian areas         </td> <td data-bbox="1328 855 1469 1075">7/15/2025</td> <td data-bbox="1469 855 1675 1075">Agricultural Services</td> <td data-bbox="1675 855 1883 1075">Management</td> <td data-bbox="1883 855 1995 1075"></td> </tr> <tr> <td data-bbox="685 1075 898 1163">June 23, 2025</td> <td data-bbox="898 1075 1328 1163">Create an album of species to facilitate recognition</td> <td data-bbox="1328 1075 1469 1163">7/31/2025</td> <td data-bbox="1469 1075 1675 1163">Agricultural Services</td> <td data-bbox="1675 1075 1883 1163">Management</td> <td data-bbox="1883 1075 1995 1163"></td> </tr> <tr> <td data-bbox="685 1163 898 1311">August 1, 2025</td> <td data-bbox="898 1163 1328 1311">Conduct a second semester 2025 assessment of the presence of invasive plants on plots</td> <td data-bbox="1328 1163 1469 1311">September 30, 2025</td> <td data-bbox="1469 1163 1675 1311">Agricultural Services</td> <td data-bbox="1675 1163 1883 1311">Management</td> <td data-bbox="1883 1163 1995 1311"></td> </tr> </tbody> </table>	Action Plan (Implement actions)						Start Date	Action	End Date	Names of those responsible		% progress	To do	Verify	6/23/2025	Define the POE and its records to ensure the proper management of invasive species and voluntary palms  Make key for controlling invasive species in riparian areas	7/15/2025	Agricultural Services	Management		June 23, 2025	Create an album of species to facilitate recognition	7/31/2025	Agricultural Services	Management		August 1, 2025	Conduct a second semester 2025 assessment of the presence of invasive plants on plots	September 30, 2025	Agricultural Services	Management	
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	August 1, 2025	Make an annual plan to control the presence of volunteer plants in palm lots and riparian areas.	9/30/2025	Agricultural Services	Management	
	August 1, 2025	Create a database of invasive species sightings.	9/30/2025	Agricultural Services	Management	
	10/1/2025	Prepare a semi-annual report on progress and compliance with indicators	Semiannual	Agricultural Services	Management	
<b>Date of Response</b>	27.06.2025					
<b>Audit Team Conclusion</b> (including any evidence reviewed)	The plan was approved on July 3, 2025, and its implementation will be reviewed in the next ASA1 follow-up audit.					
<b>Status of Nonconformity</b>	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Open					
<b>Date of Closure:</b>	-					



<b>Indicator Number</b>	7.7.2
<b>Nonconformity Number</b>	16
<b>Nonconformity Category</b>	<input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity
<b>Recurring Nonconformity</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Date of Nonconformity Issued</b>	30.05.2025
<b>Nonconformity Issued To</b> <i>(when more than one site/member):</i> N/A	
<b>Deadline:</b>	<input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting
<b>Mode of Nonconformity Closure</b>	<input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Non-Conformity Statement:</b>            The company has not submitted its peatland declaration to the RSPO secretariat.</p> <p>During the document review, an email dated April 21, 2023, was found that was sent by the company to the RSPO declaring and attaching information indicating that they do not have peat soils. However, the second declaration, which should have been made before November 2023 in the Google form format, has not been made.</p>	
<p><b>Evidence:</b>            - Document review</p>	
<b>Root Cause Analysis</b>	<b>Analyze:</b> What are the causes and why?



	Category	Root cause	Why 1	Why 2	Why 3	Why 4	Why 5
	1. Labor						
	2. Environment						
	3. Material/Raw Material						
	4. Method	The company has not submitted its peatland declaration to the RSPO Secretariat	Because the Google Form required by the RSPO was not completed within the established deadline	Because it was assumed that the initial declaration sent by email in April 2023 was sufficient to meet the requirement	Because no company in the group has peatlands, it was therefore thought that no further declarations were necessary	Because the guidelines sent by the RSPO were unknown	
	5. Machinery/Equipment						
	6. Measurement						



<b>Correction(s)</b>	1. Validate the hectares declared to the RSPO by companies under the membership of Compañía Industrial Aceitera Coto 54 and make the peatland declaration using the Google Form Second Submission of RSPO Peat Inventory.																									
<b>Corrective Action Implemented</b> <i>(including any evidence submitted)</i>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #333; color: white;"> <th colspan="6" style="text-align: center; padding: 5px;">Action Plan (Implement actions)</th> </tr> <tr style="background-color: #eee;"> <th rowspan="2" style="width: 15%;">Start Date</th> <th rowspan="2" style="width: 35%;">Action</th> <th rowspan="2" style="width: 15%;">End Date</th> <th colspan="2" style="width: 35%;">Names of those responsible</th> <th rowspan="2" style="width: 10%;">% progress</th> </tr> <tr style="background-color: #eee;"> <th style="width: 15%;">To do</th> <th style="width: 20%;">Verify</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">07/16/2025</td> <td>Send evidence of submission of the Google form on Second Submission of RSPO Peat Inventory to the certifying body.</td> <td style="text-align: center;">08/15/2025</td> <td style="text-align: center;">Sustainability Manager</td> <td style="text-align: center;">Sustainability Management</td> <td></td> </tr> </tbody> </table>						Action Plan (Implement actions)						Start Date	Action	End Date	Names of those responsible		% progress	To do	Verify	07/16/2025	Send evidence of submission of the Google form on Second Submission of RSPO Peat Inventory to the certifying body.	08/15/2025	Sustainability Manager	Sustainability Management	
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<b>Date of Response</b>	27.06.2025																									
<b>Audit Team Conclusion</b> <i>(including any evidence reviewed)</i>	The plan was approved on July 3, 2025, and its implementation will be reviewed in the next ASA1 follow-up audit.																									
<b>Status of Nonconformity</b>	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Open																									
<b>Date of Closure:</b>	-																									



## 8. Opportunity for Improvement (OFI) Issue in this Audit

<b>Indicator Number</b>	3.8.5(C)
<b>Opportunity for Improvement Number</b>	1
<b>Date of Opportunity for Improvement Issued</b>	30.05.2025
<b>Opportunity for Improvement Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Opportunity for Improvement Statement:</b>            The company has a Sales and Dispatch Procedure for Oil and Almonds at IARAAS, code IA-AD-PO-16-05, which details the activities to be considered for shipments to Puerto Corinto, the reception point for oil certified under the IP model. These activities include the inspection of the tank, establishing that it must be washed prior to loading the oil. The execution of this cleaning activity is generalized, and if there is a rejection due to non-compliance with this condition, it does not specify who should perform the cleaning activity and what evidence should be presented.</p>	

<b>Indicator Number</b>	4.2.1(C)
<b>Opportunity for Improvement Number</b>	2
<b>Date of Opportunity for Improvement Issued</b>	30.05.2025
<b>Opportunity for Improvement Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Opportunity for Improvement Statement:</b>            The PQRS control register showed that in 2024, there were 456 requests from external stakeholders, of which 455 were petitions and 1 was a complaint, all of which were effectively closed within the timeframes defined in the Procedure for Petitions, Complaints, Claims, Acknowledgments, and Suggestions (PQRS).            In an interview with external stakeholders, it was reported that some communities communicated to the Kukra Hill Mayor's Office regarding the presence of flies in 2024, apparently caused by the application of pinzote fiber in some of the palm plantations of Cukra Development Corporation. This entity reported this development verbally to the company and was invited to learn about the process of applying pinzote fiber in the field and the implemented controls.</p> <p>The same situation occurred with a request to verify the boundaries between one of the company's plantations and the cemetery located in the Flor de Pino community. In an interview with the RASS Oil Industry Management, it was indicated that the Mayor's Office informally commented on this during a visit to the Flor de Pino community and indicated that a letter with the details of this request should be sent in order to begin processing it.</p> <p>As of the audit date, there is evidence of the processing of these two requests, but no record of them in the PQRS control matrix.</p>	



During the consultations, an independent (private) producer reports that he filed a written complaint in 2024 regarding the generation of flies due to the activity. There are evidence of its registration and the actions implemented until its effective closure within the defined time frame.

<b>Indicator Number</b>	6.2.5
<b>Opportunity for Improvement Number</b>	3
<b>Date of Opportunity for Improvement Issued</b>	30.05.2025
<b>Opportunity for Improvement Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<b>Opportunity for Improvement Statement:</b>	
<p>During interviews conducted as part of the internal consultation process and field visits, it was found that workers who do not live in the camp are allocated a daily amount of 45 cordobas for food. The workers consulted agreed that this amount is insufficient to adequately cover their daily food needs at lunchtime. Likewise, an opportunity was identified to strengthen the basis for this allowance through an analysis that supports its definition and adequacy.</p>	

<b>Indicator Number</b>	7.5.1(C)
<b>Opportunity for Improvement Number</b>	4
<b>Date of Opportunity for Improvement Issued</b>	30.05.2025
<b>Opportunity for Improvement Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<b>Opportunity for Improvement Statement:</b>	
<p>The company has a map showing the slope ranges of the different productive areas of the farms. The map identifies areas with slopes in the following ranges:</p> <ul style="list-style-type: none"> <li>0-5° = Gentle slope</li> <li>5-10° = Moderate slope</li> <li>10-15° = Steep slope</li> <li>15-25° = Very steep slope</li> <li>&gt;25° = Too steep slope.</li> </ul> <p>Palm areas with slopes greater than 25° were eliminated and dedicated to conservation.</p> <p>Nicaraguan law and Nicaragua's 2021 national interpretation of the RSPO P&amp;C states that the maximum slope allowed is 35% (19.3°). The company's definition of slopes between 15° (26.8%) and 25° (46.6%) does not allow for certainty regarding the area with slopes less than 35%.</p>	



<b>Indicator Number</b>	7.8.4(C)
<b>Opportunity for Improvement Number</b>	5
<b>Date of Opportunity for Improvement Issued</b>	30.05.2025
<b>Opportunity for Improvement Issued To</b> ( <i>when more than one site/member</i> ): N/A	
<b>Standard Reference</b>	RSPO Principles and Criteria 2018 – IN Nicaragua 2021
<p><b>Opportunity for Improvement Statement:</b></p> <p>During the document review, it was verified that the company keeps monthly records of water consumption per ton of fruit processed in the extraction plant. The company states that the average annual water consumption target is 1 m<sup>3</sup>/MT of processed RFF, so its compliance analysis is based on the annual average and not the monthly average as presented during the audit.</p> <p><b>Evidence:</b></p> <p><b>2024</b>  January: 1.17 m<sup>3</sup> /MT RFF Processed  February: 1.18 m<sup>3</sup> /MT RFF Processed  March: 1.25 m<sup>3</sup> /MT RFF Processed  April: 1.21 m<sup>3</sup> /MT RFF Processed  May: 1.15 m<sup>3</sup> /MT RFF Processed  Annual average: 0.95 m<sup>3</sup> /MT of processed RFF</p> <p><b>2025</b>  April: 1.14 m<sup>3</sup> /MT of processed RFF  Cumulative average to April: 1.03 m<sup>3</sup> /MT of processed RFF</p> <p>- Monthly water consumption database UN-SB-BD-11</p>	



## 9. 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		
N/A	N/A	N/A	N/A	N/A	N/A

Indicator No	Opportunity for Improvement Number	Opportunity for Improvement Statement:	Verification / Follow-up actions:
N/A	N/A	N/A	N/A



## 10. 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: 14/04/2025

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

11.1 For Audit Report

11.2 For Public Summary Report

No	Consulted Stakeholders <i>(Type of Stakeholders)</i>	Date of Consultation/ Comment Received	Method of Consultation/Comment received	Feedback/Comments/Issue Raised Received from Stakeholders	CB's Responses
1	Ministry of Education Office of the Ombudsman for the Protection of Human Rights National Police Fire Department Kukra Hill City Hall Medical Clinic	28/05/2025	In person invitation	The municipality demonstrates active engagement with the company in community development through collaboration in education, sports, and public services. It supports local events, contributes to cleaning services, and assists with road repairs when needed. Coordination with national institutions such as the Ministry of Education and the Ministry of Health is ongoing, and joint actions are carried out with local authorities. No land-related issues were reported during the consultation.	No comments required.



				<p>Capacity-building efforts are present across various sectors. Local brigades participate in emergency-preparedness activities, including fire prevention and oil-spill response training. Technical workers such as electricians and welders have received certifications, and emergency systems and procedures have been reviewed to ensure readiness. Community spaces, including facilities related to health and childcare, have also been inspected as part of routine verification activities.</p> <p>Health, education, and community engagement initiatives remain active. Emergency care is provided through local clinics, and educational programs on topics such as gender equality and child-labor prevention have contributed to improved school attendance. Additional activities include first-aid training for drivers, ongoing environmental efforts such as reforestation, and coordination for permits with environmental authorities. Stakeholders emphasized that social initiatives have supported local development through job creation, infrastructure improvements, and educational programs.</p> <p>Community infrastructure continues to be strengthened through improvements to public facilities, support for teachers, and assistance with local celebrations.</p>	
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				Although concern was raised regarding fly presence in certain areas, inspections were conducted and the matter has since been resolved.	
2	Communities Leaders (12 participants)	28/05/2025	In person	<p>Community representatives report maintaining a positive and collaborative relationship with the company, noting that communication has improved since the hiring of a Social Manager from the local area. They highlight that the company's presence has created formal employment opportunities and contributed to higher household incomes, benefiting overall community well-being.</p> <p>Participants also describe respectful coexistence with the company's security personnel. They note that security staff do not display weapons and that community members have free access through company areas, following established rules such as respecting speed limits and avoiding hunting, fishing, or cutting trees.</p> <p>Several positive initiatives were mentioned, including employment generation, provision of school supplies, transportation support for students, food assistance, and contributions to community events and small producers. The company has also supported public</p>	<p>Triangulation is carried out with the auditors who were reviewing environmental and agronomic indicators and conducting field visits to determine whether fly control through the application of empty bunches is effective.</p> <p>An OFI was raised in 4.2.1 (C).</p>



				<p>services, emergency response training, and joint drills with surrounding communities.</p> <p>Stakeholders noted some previous issues with flies in certain areas; however, they explained that the company has implemented control measures, which are now effective, though ongoing attention is recommended. They also suggested strengthening waste-management awareness to discourage garbage burning. No land conflicts were reported, and participants confirmed their understanding of property boundaries. They also indicated that there has been no aerial spraying and that they are informed about communication channels, available documents, and procedures for submitting petitions or complaints, including options for anonymity and defined response times.</p>	
3	Independent Smalholders (10 participants)	27/05/2026	In person	<p>Small producers supplying fresh fruit bunches report maintaining commercial contracts with the company that include agreed-upon pricing. They note that they receive technical assistance to increase productivity, have had their contractual commitments honored, and have been trained in responsible agrochemical management and proper use of personal protective equipment.</p>	<p>Triangulation is carried out with the auditors who were reviewing environmental and agronomic indicators and conducting field visits to determine</p>



				<p>They also mention access to short-term loans for fertilizers and infrastructure improvements, with defined repayment periods.</p> <p>Participants highlight several positive community impacts linked to the company's presence. Local infrastructure has improved, particularly transportation routes, which facilitate safer mobility. Transportation support is provided for schoolchildren, and assistance is given to local authorities through fuel donations for patrol vehicles. The producers confirm awareness of policies prohibiting hunting, fishing, logging, child labor, and forced labor. They also state that no aerial spraying has taken place and that they are familiar with established procedures for submitting requests, complaints, or acknowledgments, including options for anonymity. Communication has reportedly become more effective since the hiring of a Social Manager from the community.</p> <p>A negative impact previously identified was the presence of flies during 2024. According to participants, the company has since taken measures to control the situation, which is now under management.</p>	<p>whether fly control through the application of empty bunches is effective.</p> <p>An OFI was raised in 4.2.1 (C).</p>
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4	Gender committee (6 participants)	28/05/2026	In person	<p>Participants reported that the committee was elected for the period from July 2024 to July 2026. The gender committee operates with an annual calendar and a yearly work plan designed to identify the needs of women in the workforce, including new mothers. Several activities have been implemented in coordination with company leadership. Members also received training from the Ministry of Women, which covered gender equality, prevention of discrimination, types of harassment, and relevant legislation protecting women’s rights.</p> <p>Based on the needs identified during direct consultations with new mothers, a specific procedure was developed to support women during pregnancy and breastfeeding. The committee also works on identifying opportunities to improve conditions for women in the workplace. As part of these efforts, incentive programs have been introduced, including performance-based recognition. For example, each farm provides a quarterly basic basket to the fruit harvester who demonstrates the best performance, lowest absenteeism, and highest quality results.</p>	No comments required.
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5	HSE committee (31 participants including oil mill and field)	28/05/2025	In person	<p>Participants explained that the Minutes Book was officially registered with the Ministry of Labor in September 2024, and that the Occupational Health and Safety (OHS) committee was formally renewed for the 2025–2027 period with balanced representation from both workers and management, appropriate for a workforce of 145 employees.</p> <p>The committee’s main responsibilities include supervising the implementation of workplace health and safety measures, analyzing the causes of accidents and occupational illnesses, and recommending corrective actions to prevent recurrence. It also participates in identifying workplace risks, conducts inspections across different areas, documents findings, and tracks the closure of corrective actions. Maintaining proper records and documentation is an integral part of its mandate.</p> <p>Participants confirmed that the company allocates the necessary budget to support the OHS plan and enables the implementation of required corrective measures. During the consultation, three sets of meeting minutes from October and November 2024 and April 2025 were reviewed, demonstrating follow-up on previous commitments as well as the</p>	No comments required
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				identification and reporting of new risks observed during inspections.	
6	Union (20 participants)	28/05/2025	In person	<p>Participants explained that the company has a collective agreement effective from May 14, 2025, with a two-year validity period. Prior to its renewal, union representatives and company management held meetings to review existing conditions and discuss proposed updates. All formal communication between both parties are documented. Payroll records include the corresponding union deductions, and the union may request meeting space through Human Resources or directly with management when needed.</p> <p>One key provision of the agreement is the company's commitment to maintain a special minimum wage during the entire validity period of the agreement. This wage is set at 15% above the legal minimum wage established by the National Minimum Wage Commission for full-time workers, supporting the socioeconomic well-being of employees.</p> <p>During the consultation, participants noted that, based on feedback from workers, certain additional benefits are sometimes agreed upon beyond the terms of the collective agreement. One</p>	<p>The additional benefits beyond which were reviewed with the collective agreement such as the payment of general transportation costs for workers who collect loose fruit.</p> <p>It was evidenced the minute record dated 20/02/2025. The request was done by FETPANAMAS representatives and was approved the review and application of travel allowances for all workers involved collect loose fruit, since March 2025.</p>



				<p>example mentioned is the assumption of general transportation costs for workers who collect loose fruit.</p>	<p>Also, it was a requested for financing requested for some workers, evidenced by the minutes of the meeting and agreements of March 13, 2025, where financing is approved for 12 workers who could pay. It will be processed through loan forms, and the staff will pay it off in 12 biweekly installments.</p>
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11.3 Summary of workers interviewed, and the CB's responses and findings are presented in the table below:

<b>Total Workers in the Unit of Certification</b>	<b>1578</b>
<b>Sampled Worker Consulted/ Interviewed in This Audit</b>	<b>112</b>



No	Type of Workers Consulted/ Interviewed	Interview Method	Feedback/Comments/Issue Raised/ Received from Workers	CB's Responses
1	Permanent/coyol collector	Individual	The worker who collects coyol says she has a written contract for an indefinite period, her pay is based on production, kilograms collected, she earns at least minimum wage during harvest season, the workday is eight hours, from 5:30 a.m. to 1:30 p.m., plus the company provides personal protective equipment, she is aware of the union but is not a member, she has access to medical services through the INSS, she has emergency services, she knows what to do in case of an emergency, she has received training on endangered species and high conservation values, and she has enjoyed her vacations during the two years she has been working.	No additional comments
2	Permanent/coyol collector	Individual	The worker who collects coyol says she has a written contract for an indefinite period, her pay is based on production, kilograms collected, she earns at least minimum wage during harvest season, the workday is eight hours, from 5:30 a.m. to 1:30 p.m., plus the company provides personal protective equipment, she is aware of the union but is not a member, she has access to medical services through the INSS, she has emergency services, she knows what to do in case of an emergency, she has received training	No additional comments



			on endangered species and high conservation values, and she has enjoyed her vacations during the two years she has been working	
3	Permanent/harvest	Group of 3	The workers interviewed are engaged in harvesting RFF, have a written and indefinite contract, work hours are, they have stated that PPE is provided by the company at no cost, the working day is from 5:30 a.m. to 1:30 p.m., with a salary per ton harvested, they have received training on the safe handling of tools, they have freedom of association, they state that they can join the union, know how to file complaints or claims, and state that they have knowledge of rare species, waste management, and emergency response.	No additional comments
4	First aid supervisor/brigade member	Individual	Supervisor duties, responsible for providing first aid to workers, explaining how to proceed in the event of accidents, which generally do not occur, explaining the contents of the first aid kit.	No additional comments
5	Permanent/mechanical plating technician	Group of 2	The workers interviewed work as mechanics in sheet metal workshops, have a written, indefinite contract, and, according to their statements, work from 5:30 a.m. to 1:30 p.m. They are paid a daily wage for skilled labor. There is no discrimination or forced labor on the farms. When overtime is required, it is voluntary. They have received training on the safe use of tools, have freedom of association, say they can join the union, know how to file complaints or claims, and say they have	No additional comments



			knowledge of rare species, waste management, and emergency response.	
6	Permanent/Use of brush cutter	Individual	The workers interviewed work with brush cutters for weed control, have a written contract of indefinite duration, and, according to their statements, work from 5:30 a.m. to 1:30 p.m. They are paid by the hectare. There is no discrimination or forced labor on the farms. When overtime is required, it is voluntary. They have received training on the safe use of tools, have freedom of association, say they can join the union, know how to file complaints or claims, and claim to have knowledge of rare species, waste management, and emergency response.	No additional comments
7	Permanent/Use of brush cutter	Individual	The workers interviewed work with brush cutters for weed control, have a written contract of indefinite duration, and, according to their statements, work from 5:30 a.m. to 1:30 p.m. They are paid by the hectare. There is no discrimination or forced labor on the farms. When overtime is required, it is voluntary. They have received training on the safe use of tools, have freedom of association, say they can join the union, know how to file complaints or claims, and claim to have knowledge of rare species, waste management, and emergency response.	No additional comments
8	First aid supervisor/brigade member	Individual	Supervisory workers for weed control using motorized brush cutters have a written contract for an indefinite period and, according to their statements, work from 5:30 a.m. to 1:30 p.m. They are paid according to the amount of work completed	No additional comments



			per hectare. There is no discrimination or forced labor on the farms. When overtime is required, it is voluntary. They have received training in first aid and emergency care and enjoy benefits such as bonuses and vacations.	
9	Permanent/coyol collector	Group of 4	The coyol harvesters say they have a written contract for an indefinite period, their salary is based on production, the kilograms harvested, they earn at least the minimum wage during the harvest season, the working day is eight hours, from 5:30 a.m. to 1:30 p.m., in addition, the company provides them with personal protective equipment, they know about the union but are not members, They have access to medical services through the INSS, have emergency services, know what to do in case of an emergency, have received training on endangered species and high conservation values, and have enjoyed their vacations during the two years they have been working. To reach their work area, they must walk an hour and a half in the early morning, as there is no road to the community.	No additional comments
10	Permanent/ Fruit evacuators	Group of 2	No additional comments	No additional comments
11	Permanent/harvest	individual	No additional comments	No additional comments
12	Permanent/harvest	Individual	No additional comments	No additional comments
13	Permanent/harvest	Individual	The workers interviewed are engaged in harvesting RFF, have a written and indefinite contract, work hours are, they have stated that PPE is provided by the	No additional comments



			<p>company at no cost, the working day is from 5:30 a.m. to 1:30 p.m., with a salary per ton harvested, they have received training on the safe handling of tools, they have freedom of association, they state that they can join the union, know how to file complaints or claims, and state that they have knowledge of rare species, waste management, and emergency response.</p>	
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11.4 Consultation with Previous Land User

<b>Total Identified Previous Land User in the Unit of Certification</b>			15	
<b>Sampled Previous Land User in This Audit</b>			5	
<b>Name of Previous Land User</b>	<b>Contact Details (address/telephone/email)</b>	<b>Total Area (Ha)</b>	<b>Date of Consultation</b>	<b>Result of Discussion with Previous Land User</b>
<p>The origin of the titles dates back to the agrarian reform of 1995 and 1996, which granted them to different private owners, who subsequently sold them to the company. During consultations, it was not possible to contact the previous owners. There is an available 186 property deed that the company bought from a previous private owner.</p> <p>During consultations, it was not possible to contact the previous owners. During consultations, it was not possible to contact the previous owners.</p>	-	-	-	-





## 11. 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
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Oil Mill	4356	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Ingenio I	686.12	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Ingenio II	725.48	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Cacao Mendoza	599.82	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	La Ceiba	731.46	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	La Palma	547.7	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Palma Adulta	601.9	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Ñary Lapas	669	Not Certified	2025	2025	-



INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	El Escobal	798.77	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Las Delicias	686.42	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Malopi I	692.06	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Malopi II	749.48	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	Limas San Jose	882.49	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	El Capricho	709.83	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	El Wary	784.5	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	El Borbollón	619.64	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	El Granadillo	1126.11	Not Certified	2025	2025	-



INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	El Almendro	879.22	Not Certified	2025	2025	-
INDUSTRIAL ACEITERA DE LA RAAS	Nicaragua	La Alianza	926.02	Not Certified	2025	2025	-



## 12. Requirements on Multiple Management Unit

Requirement	Findings/Compliance
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.	<b>The company is part of the parent company's TBP and has scheduled its certification in accordance with the plans established by the RSPO, including the entire supply base.</b>
Was the time bound plan submitted during the initial audit?	<b>Applicable</b>  <b>The TBP of the parent company Compañía Industrial Aceitera Coto Cincuenta y Cuatro S.A. is submitted, which includes the current certification unit IARAAS</b>
Does the time bound plan contain a current list of all estates and mills?	<b>Applicable</b>  Yes included
Does the time bound plan include the certification of all estates and mills within five years after obtaining RSPO membership?	<b>Applicable</b>  Yes included
Are there any new acquisitions of land done by the certification unit since the last audit? If YES, is the time bound plan updated to indicate that the newly acquired land is to be certified within a three year timeframe?	<b>Not Applicable</b>
If there are any deviations from these maximum periods, did the Unit of Certification request approval from the RSPO Secretariat?	<b>Not Applicable</b>
Has the CB verified the progress of the time bound plan established by the Unit of Certification during the annual surveillance audit? <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>	<b>Applicable</b>  Yes. It has been reviewed during the current period of this Initial Certification audit.
Is there any revision made to the time bound plan? If YES, has the revised time bound plan been reviewed by the CB? <i>Note: Changes to the time bound plan are allowed only if the organisation can provide evidence to the CB that these changes are</i>	<b>Not Applicable</b>



<p><i>justified</i>.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).</p>	
<p>Are there any isolated lapses in the implementation of a time bound plan? If YES, a minor non-compliance shall be raised.</p>	<p><b>Not Applicable</b></p> <p>No isolated failures identified</p>
<p>Is there any evidence of fundamental failure to proceed with the implementation of the plan? If YES, a major non-compliance shall be raised.</p>	<p><b>Not Applicable</b></p> <p>No, there is no evidence of non-compliance found during the review.</p>

### 13. 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&amp;C criterion 7.3 since 1st January 2010? If YES, did the CB verify that it complies with the RSPO New Planting Procedure (NPP)? <i>Note: For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB</i></p>	<p><b>Not applicable, as the company submits its entire supply base for certification during its single certification audit.</b></p>
<p>Are there any land conflicts reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member? 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&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.?</p>	<p><b>Not Applicable</b></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>Is there any labour dispute reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member? If YES, is it being resolved through a mutually agreed process, per RSPO P&amp;C criterion 4.2? <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>	<b>Not Applicable</b>
<p>Is there any legal non-compliance reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member? If YES, has it been addressed through measures consistent with the requirements of RSPO P&amp;C criterion 2.1? <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>	<b>Not Applicable</b>
<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> 1. This would necessitate evidence of the self-assessment for each requirement. 2. A POSITIVE ASSURANCE statement is MANDATORY to indicate the outcome of self-assessment.</p>	<b>Not Applicable</b>
<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>	<b>Not Applicable</b>
<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>	<b>Not Applicable</b>
<p>Based on the result of the desktop study, did the CB decide to perform further stakeholder consultation or field inspection to assess</p>	<b>Not Applicable</b>



the risk of any potential non-compliance with the requirements (as necessary)?	
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## 14. 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 checked="" type="checkbox"/>	Certification (Initial Certification)
<input 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> )





## 15. Acknowledgment of Internal Responsibility and 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"> <li>· Acceptance of responsibility in execution of the instructions given.</li> <li>· 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.</li> <li>· That during the closing meeting all agenda items were covered by the Audit Team Leader.</li> </ul>	
Acknowledged by:	
Name	Martín Vargas B
Position	General Manager
Date	03/03/2026
<div style="border: 1px solid black; width: 150px; height: 150px; margin: 0 auto; background-color: #e0e0ff; display: flex; align-items: center; justify-content: center;">  </div> <p>Signature</p>	





**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 Weesmery Navarro Lapeira

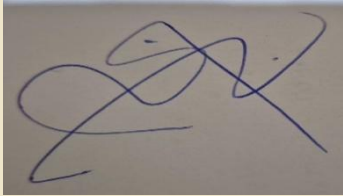
Position Lead Auditor

Date 15.12.2025

A handwritten signature in black ink, appearing to read "Weesmery Navarro L.", written over a light beige background.

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	Frank Kwesi
Position	Senior Technical Specialist
Date	28/02/2026
 Signature	

## Appendix 1: Location Map Unit of Certification and Supply bases

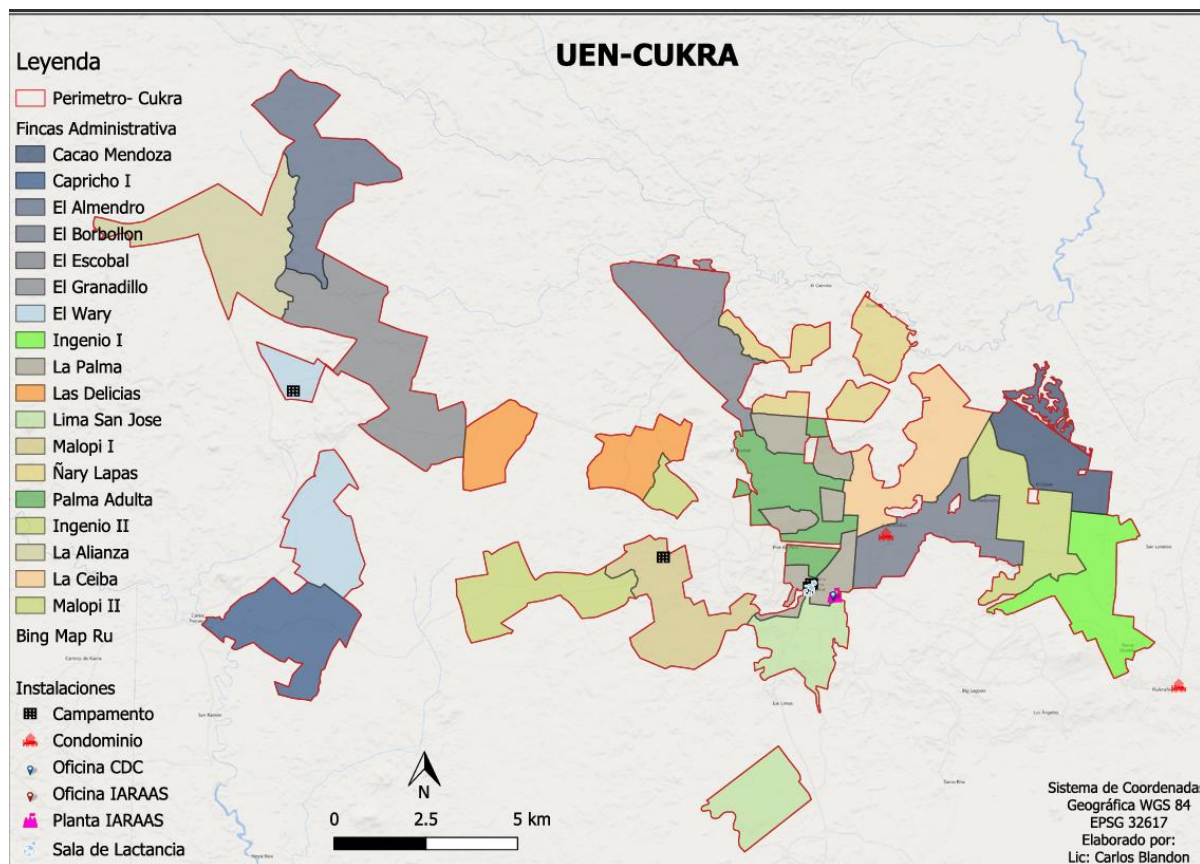


Figure 1: Map of Unit of Certification



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

Assessment Type	Date of Audit	Changes
Initial Certification	26-30/05/2025	N/A





## Appendix 3: Greenhouse Gas (GHG) Reporting Summary

The GHG emissions produced by the Industrial Aceitera de la RAAS S.A. (POM and its supply bases) in the period of January 2024 until December 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 the Industrial Aceitera de la RAAS S.A and supply base are as following:

### 1. Summary of Emissions

Description	tCO <sub>2</sub> eq/t product
CPO	0.27
PK	0.27
PKO	0.00
PKE	0.00

Extraction	tCO <sub>2</sub> e/t product
OER	22.82
KER	5.11





## 2. Summary of Plantation/Field Emissions and Sink

Land Use	Ha
OP Planted Area	10442.95
OP Planted on Peat	0.00
Conservation (Forested)	1662.38
Conservation (Non-Forested)	0.00
<b>Total</b>	<b>12105.33</b>

Production	t/year
FFB Processed	248,918.44
CPO Produced	56806.98



	Own Crop		Group		3rd Party		Total
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ tFFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ tFFB	
Land Conversion	103141.24	0.55	0	0	0	0	103141.24
CO <sub>2</sub> Emission from Fertilizer	19607.50	0.11	0	0	0	0	19607.50
N <sub>2</sub> O Emission	7407.58	0.04	0	0	0	0	7407.58
Fuel Consumption	1827.44	0.01	0	0	0	0	1827.44
Peat Oxidation	0.00	0.00	0	0	0	0	0.00
Crop Sequestration	-97748.02	-0.52	0	0	0	0	-97748.02
Sequestration in Conservation Area	-9143.09	-0.05	0	0	0	0	-9143.09
<b>Total</b>	<b>25092.64</b>	<b>0.13</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>25092.64</b>

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



### 3. Summary of Mill Emission and Credits

	tCO <sub>2</sub>	tCO <sub>2</sub> e/t FFB
<b>Emission</b>		
POME	13923.69	0.06
Fuel Consumption	492.28	0
Grid Electricity Utilization	205.78	0
<b>Credit</b>		
Export of Excess Electricity to Housing & Grid	0	0
Sales of PKS	-29552.42	-0.12
Sales of EFB	0	0
<b>Total</b>	<b>-14930.67</b>	<b>-0.06</b>



#### 4. Palm Oil Mill Effluent (POME) Treatment

Description	%
Diverted to	0
Divert to anaerobic digestion	100

#### 5. POME Diverted to Anaerobic Digestion

Description	%
Diverted to anaerobic pond	100
Diverted to methane capture (Flaring)	0
Diverted to methane capture (electricity generation)	0

