

RSPO P&C Annual Surveillance Assessment Public Summary Report

PALMAS DEL CESAR S.A.¹



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1. Scope of the Surveillance Assessment

1.1 Certification Details

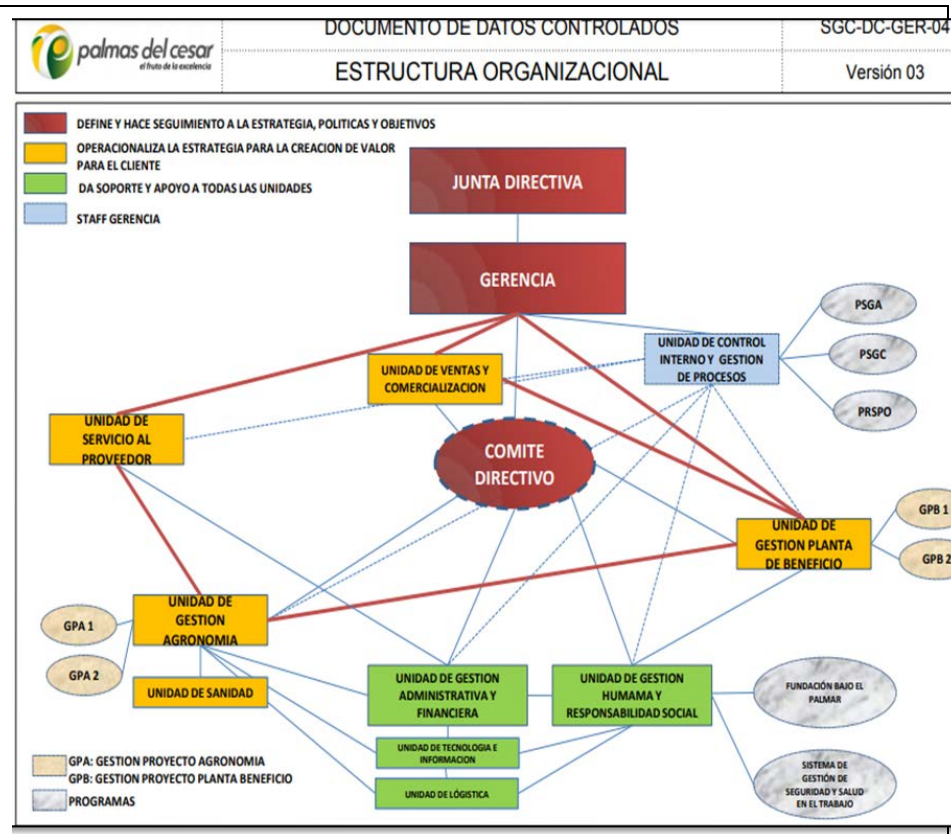
Certification Details	
Name of RSPO Member	PALMAS DEL CESAR S.A.
RSPO Membership Number (including sub-unit numbers for each certification unit, obtainable from RSPO Secretariat)	1-0161-14-000-00
PalmTrace Registration Number	RSPO_PO1000004752
Trademark License Number	1-0161-14-000-00
Certificate number	SCS-RSPOPC-000083
Start date certificate (dd/mm/yy)	22-03-2017
End date certificate (dd/mm/yy)	21-03-2022
Audit	
Assessment Type	2 nd surveillance
Date of Audit (dd/mm/yy)	08/04/19 to 12/04/19
Start date License (dd/mm/yy)	22-06-2019
End date License (dd/mm/yy)	21-03-2020
Date of previous assessment	18-01-2018
Other certifications held	
ISO 9001	
Group Certification <input checked="" type="checkbox"/> (Check if N/A)	
Name of Group	
Name of Group Manager	
Level of group organization (mill, estate, independent farmer, etc)	
Address	
City / Town	
State	
Country	
Contact Person	
Tel	

Email	
Description of sampling process	

1.2 Organization Description

Overview of Organization	
General description of the organization (e.g., operations, customers, products, ownership structure, function of the sites, number of employees)	Palmas de Cesar S.A. is a privately held palm oil industrial facility which includes: 1 extraction mill, (2 lines) 1 Palm Kernel extraction plant. Central offices are located in Bucaramanga, Department of Santander, Colombia Industrial facility is located in Municipio de San Martín, Department of Cesar, Colombia. Organization has held P&C and Supply Chain Certification since 2017. The current certification scope includes a supply base with approximately 3400 hectares in the production of bunches of palm fruit, a crude palm oil extraction plant with an average production capacity of 58 tn/hr of FFB (divided into two process lines. Palmas del Cesar utilizes BIOSA LC software to keep track of each FFB suppliers, coming from a combination of own farm/external fruit suppliers.
Scope for which certification is being sought	This certificate covers the production of sustainable palm oil and palm kernel using the Mass Balance supply chain model.
Description of any changes to the certificate (e.g., new contact information, COC operations, sites, business activities, products)	Change in certification bodies from Naturacert to SCS Global Services
Description and SCS review of any complaints, disputes, or allegations of non-conformities received by the organization and/or SCS	<input checked="" type="checkbox"/> N/A, no complaints, disputes, or allegations of non-conformities
Outsourcing activities (e.g., number of contractors, COC processes outsourced, agreements)	<input checked="" type="checkbox"/> N/A, not outsourcing
Central office management of multiple sites/group members (e.g., relationship between sites, training, internal audit program)	<input checked="" type="checkbox"/> N/A, not a group or multi-site
Trademark use and passing on of claims (e.g., general corporate communications, B2B communications, B2C communications, trademark usage)	Trademark License: 1-0161-14-100-00 expiration date 01/11/2019. Business-to-business communication: Module specific claims and P&C and SCC claims made in the form of remission tickets and invoices. General corporate communication in the form of trademark use, in digital format on the website: www.palcesar.com .

Company Organizational Structure (Organizational Chart)



1.3 Mill Details

Mill Description		
Name of <input checked="" type="checkbox"/> Mill <input checked="" type="checkbox"/> Estate	PALMAS DEL CESAR S.A.	
Address	Km. 113 – vía al mar Corregimiento de Minas, Tel: (097) 6334109 – Ext: 316 - 3168302898	
City / Town	San Martín	
State	(Cesar)	
Country	COLOMBIA	
Mill GPS Location	Long: 7°53' 10" Latt: 73°28' 00"	
Contact Person	Viviana Dueñas	
Tel	+57 3168302898	
Email	viviana.duenas@palcesar.com	
Mill Capacity (mt/hr)	58 (One Line 30 mt/h, The other line: 28 mt/hr(h)	
Supply Chain Model (IP/MB)	MB	

Palm Oil Mill Output and Approximate Tonnages Certified				<input type="checkbox"/> (Check if N/A-initial audit)	
<p>The 12 month output is the average over any 12 month period and the actual production for the 12 months from the date of certification will be included in the annual summary.</p> <p>For the 12 month period ending 31/12/2018 the mill received 251,692.890 MT of FFB.</p> <p>No Credits sold under Book & Claim Scheme, CSPK nor CSPO. Volumes of FFB, CSPO and CSPK per Palm Trace. The projections for the next 12 months is given by the Company</p>					
Reporting Period				January 1, 2018 - December 31, 2018	
FFB received and processed by the mill for the 12 months prior to audit (January 2018-December 2018)				MT RSPO FFB	73,478.11
				MT Conventional FFB	178,065.26
FFB received on the previous 12 months, month by month:					
	RSPO MB	Conventional		RSPO MB	Conventional
January	8,252.82	17,938.27	July	2,412.38	11,621.20
February	7,716.27	16,702.60	August	6,711.95	14,934.56
March	6,530.13	19,970.86	September	7,042.67	14,645.33
April	8,704.76	19,351.83	October	7,476.67	16,304.00
May	5,502.03	11,188.36	November	5,820.67	12,902.58
June	3,959.52	8,811.95	December	3,348.23	13,693.75
Projected production from last reporting period MT		Actual Production for this audit period MT		Projected for next reporting period MT	
CSPO	CSPK	CSPO	CSPK	CSPO	CSPK
19,320	4,398	15,737	3,345	18,962	4,202
Last reporting period License actual sold volume MT		Last reporting Period Actual sold volume under other schemes		Last Reporting Period Actual Sold Volume as Conventional	
CSPO	CSPK	CSPO	CSPK	CSPO	CSPK
12,881	3,335	n/a	n/a	2,856	10

1.4 Supply Base Details

A. Production Breakdown				
	Estate	Scheme/ Associated SH	Independent SH	Outgrowers
Number of Production Units	1	N/A	N/A	N/A
Number of Individual Smallholders	N/A	N/A	N/A	N/A
Certified Area (ha)	4,191.05	N/A	N/A	N/A
Production Area (ha) – mature	3,348.36	N/A	N/A	N/A

Immature Area (ha)	339.85			
Other uses, conservation, cattle, etc (ha)	502.84	N/A	N/A	N/A

B. Description of fruit supply base*(including palm age profiles of all directly managed plantings for each management unit)*

Fruit Supply Base	Description:						
<i>Palmas del Cesar S.A.</i>	There is just one plantation, which is divided into 37 agricultural management units, all managed by the company. The production areas were acquired starting in 1962 in accordance to land titles.						
	Year Planted (includes replantings)	2000 & Before	2001-2005	2006-2010	2011-2015	2016-2018	Total
	Immature (ha) (3 years or younger)	0	0	0	0	339.85	339.85
	Mature (ha)	611.78	1149.83	1171.65	415.1	0	3,348.36
	Total (ha)	611.78	1149.83	1171.65	415.1	339.85	3,688.21

C. Supply of Non-Certified FFB from Associated/Scheme Smallholder ☒ (Check if N/A)

	Scheme/Associated SH	Scheme/Associated Outgrower
Volume of non-certified FFB (mt)		
Production Area (ha)		
Number of Individual Smallholders/Outgrower		
Name of Cooperative/Association (if relevant)		

1.5 Standards Employed

Applicable RSPO Standards/Modules
<input checked="" type="checkbox"/> RSPO Principles & Criteria for the Production of Sustainable Palm Oil (2013)
<input type="checkbox"/> RSPO Principles & Criteria for the Production of Sustainable Palm Oil (2018)
<input checked="" type="checkbox"/> RSPO National Interpretation <i>(Colombia - 2013)</i>
RSPO Supply Chain Certification Standard (2017)
<input type="checkbox"/> Module D- CPO Mills : Identity Preserved
<input checked="" type="checkbox"/> Module E- CPO Mills: Mass Balance
<input checked="" type="checkbox"/> RSPO Rules on Market Communications and Claims (2019)
All standards employed are available on the RSPO website: http://www.rspo.org/resources/key-documents/certification

2. Assessment Process

2.1 SCS Global Services

SCS Global Services (SCS) has been providing global leadership in third-party environmental and sustainability certification, auditing, testing, and standards development for nearly 30 years.

SCS' programs span a wide cross-section of industries, recognizing achievements in green building, product manufacturing, food and agriculture, forestry, retail, and more. SCS is accredited to provide services under a wide range of nationally and internationally recognized certification programs; and was approved as a RSPO Certification Body (RSPO-ACC-024) for Principles & Criteria on *13 November 2018*.

2.2 Annual Audit Team

Auditor Name:	Diana Catalina Sepúlveda L	Auditor role:	Lead Auditor P&C
Qualifications:	Agronomist with 15 years in the Palm Oil Industry. Certifications include: ISO 9001 Lead Auditor, RSPO P&C Lead Auditor, RSPO Supply Chain Lead Auditor. ISCC Lead Auditor.		
Auditor Name:	Adriana Cala	Auditor role:	Lead Auditor SCC
Qualifications:	Palm Oil specialist with 20 years' experience in the oilseeds industry. Masters in International Business Administration. Certifications include: ISO 9001 Lead Auditor, RSPO Supply Chain Lead Auditor, RSPO Principles and Criteria Lead Auditor. Other certifications include: Bonsucro CoC, UTZ Coffee and Cacao Annex, ISCC SCC.		
Auditor Name:	Laura Reyes	Auditor role:	Observer

2.3 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	5
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	6
D. Total number of person days used in evaluation:	3

2.4 Assessment Plan

Date: 08.12.19 Monday	
Location / sites visited	Activities / notes
Main Office- Bucaramanga	Open Meeting
	2.1. Laws and Regulations
	2.2 Legal titles and User Rights
	Lunch
	3.1 Business Plans and Continuous Improvement

	2.2 Legal titles and User Rights
Date: 09.12.19 Tuesday	
Location / sites visited	Activities / notes
Palmas del Cesar San Alberto – Cesar Lots: Hipinlandia (97HP) Progreso Limon	Criteria: 4.2, 4.4, 4.5., 4.6, 4.7, 4.8, 5.1, 5.2 Agronomic Practices: Replanting (2018), Harvest, Pest Management and Pesticide Usage, Water Rounds, Proper Use of Personal Protection Elements, Interviews with employees
LUNCH	
Minas-Venecia Minas-Naranjo Minas-Diamantes	Agrochemical Storage, Laundry area, Biological Beds
Agronomist Office	Documental Review
End Day 2	
Date: Wednesday April 10	
Location / sites visited	Activities / notes
Palmas del Cesar San Alberto – Cesar Lots: Progreso	Criteria: 4.1, 4.2, 4.3, 4.4, 4.5., 4.6, 4.7, 4.8, 5.1, 5.2 Water Rounds, HCV Residues Management Tractor Parking Employees facilities
LUNCH	
Agronomist Office	Documental Review -Procedures - Records - Fertilizer Storage - Agrochemical Storage
DAF's Office	2.1 Legal Requirements: -Labor -Environmental -HSW
Personnel Office	4.7 HSW
Mill	SCC STAR Mill Tour

Date: Thursday April 11	
Location / sites visited	Activities / notes
DAF'S Office	Principle 5: 5.1, 5.2, 5.3, 5. Documental Review
Human Resources Office	Principle 6, 4 and 2 4.7
STAR POM offices	Emissions, Effluents Continue Improvement
LUNCH	
DAF OFFICE	6.6.1 – 6.6.2: Freedom of association
Stakeholders Contracts	Documental Review
USP DAF Office	Suppliers SOP'S Mill Water consumption
End Day 4	
Date: Friday April 12	
Location / sites visited	Activities / notes
Main Office	Closing Meeting and Preliminary Report Preparation: Auditor(s) take time to consolidate notes and confirm audit findings
Offices	LUNCH
Offices	Closing Meeting and Review of Findings: Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps

2.5 Stakeholder Consultation

In accordance with SCS protocols and the RSPO Standards, consultation and/or interviews with stakeholders are a component of the evaluation process. Public notification of all RSPO evaluations is conducted no later than 30 days prior to the on-site audit. Notification letters describing the upcoming audit are publicized on the client's website and the RSPO website.

During all assessments SCS auditors will interview staff or workers onsite and key stakeholders as identified in the standard requirements. Should the auditor deem that an assessment merits further consultation with interested parties and affiliated groups, SCS reserves the right to conduct a more in depth stakeholder consultation prior to, concurrent with, or following the evaluation.

The table below summarizes the issues raised by stakeholders during the assessment.

Summary of Stakeholder Consultation		
Stakeholder Position/Organization	Comment	Auditor response
Workers Union.	They are respected their rights, they have a collective agreement that has been fulfilled and that is about to be renewed. Good employer-employee relations	Diana Sepúlveda

2.6 Next Surveillance Visit

In accordance with RSPO timing protocols, the next audit of Company will take place on [01.2020].

3. Assessment Findings

3.1 Process of Determining Conformance

The RSPO Standard consists of principles and the performance indicators that elaborate each criterion. The standard includes verifiers to assess conformance to the standard within the appropriate local legal and regulatory context.

Consistent with SCS evaluation protocols, the audit team collectively determines whether or not the organization is in conformance with every applicable requirement of the RSPO Standard. Each instance of non-conformance must be evaluated to determine whether it constitutes a major or minor non-conformity. Non-conformity reports (NCRs) are issued for every instance of non-conformance to the standard. Major and minor non-conformities require corrective actions to be taken by the company to address the root cause of the non-conformity.

Interpretations of Major Non-conformities, Minor Nonconformities and Observations

Major Nonconformities: The RSPO certification standards highlight certain requirements against which the auditor will issue a major nonconformity if no evidence of conformance is found. These indicators are clearly identified in the reporting checklist.

For all other indicators, the generic descriptions below apply:

A major nonconformity results in (or is likely to result in) a fundamental failure to achieve the objective of the relevant requirement within the scope of the evaluation. Such fundamental failure is indicated by a nonconformity which continues over a long period of time, is repeated or systematic; affects a wide range of production; or is not corrected or adequately responded to by the responsible managers once they have been identified.

A *minor nonconformity* are issued when: it is a temporary lapse; it is unusual/non-systemic; the impacts of the nonconformities are limited in their temporal and organizational scale; and it does not result in a fundamental failure to achieve the objective of the relevant requirement.

Observations: These are notes from the audit team to alert the client to a situation that in and of itself does not constitute a nonconformity but which may lead to a future nonconformity if not appropriately addressed. Observations may be issued against those indicators where nonconformity is an automatic major NC. Corrective actions for an observation are voluntary and do not affect the standing of the certification.

3.2 Compliance Summary

The table below summarizes the results of the audit, listing all instances of non-conformance with the standard and observations noted by the audit team. Full descriptions of each non-conformity are located in Sections 3.3 and 3.4. For detailed descriptions of all the auditor's findings, please see the appropriate supporting documentation.

Summary of nonconformities and observations under the RSPO Principles & Criteria				
Principle	Major Nonconformities	Minor Nonconformities	Observations	Total # findings
Principle 1: Commitment To Transparency	-	-	-	0
Principle 2: Compliance With Applicable Laws and Regulations	-	-	-	0
Principle 3: Commitment to Long-term Economic and Financial Viability	-	-	-	0
Principle 4: Use of Appropriate Best Practices by Growers and Millers	4.6.6.	4.4.1	4.8.1	3
Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity	-	5.1.2/5.1.3	5.3.3	2
Principle 6: Responsible Consideration of Employees and of Individuals and Communities Affected by Growers and Millers	6.5.2	-	-	1
Principle 7: Responsible Development of New Plantings	-	-	-	0
Principle 8: Commitment To Continual Improvement In Key Areas of Activity.	8.1.1	-	-	1
Total	3	2	2	7

Summary of Non-conformities and Observations		
Standard/Module	Number of Non-conformities	Number of Observations
Module D- CPO Mills- Identity Preserved	-	-
Module E- CPO Mills- Mass Balance	0	0
Rules on Market Communications and Claims	0	0
Total Number	0	0

3.3 Previous Audit Nonconformities

Finding: 2018.1	
Select one: <input checked="" type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
Standard Reference	RSPO Principle & Criteria Standard 2013- 4.7.5
Non-Conformity or Observation: Auditor evidences complete and available documentation of the incidents and accidents at work. During review the previous year documentation, it was noted that there were no signatures of the responsible personnel carrying out the investigation on February 17, 2016. Company issues a Corrective action and further sent and disseminated an internal communication with date October 5, 2016. Communication sent by Lead health and safety at work and addressed to the COPASST secretariat responsible for ensuring that the signing of the records of the Accident investigation. However, this year was evidenced through interviews with the COPASST, human management personnel and documentary review investigations without participation of COPASST and five conducted in the months of June to October when work accidents occurred in the month of April, breaching the deadlines established by Resolution 1401 of 2007 in article 4 of 15 days, and in article 7, where the investigative team of work accidents is established, therefore the non-conformity reported the previous year is maintained, taking into account that a non-conformity occurs again in this indicator the category is increased to higher.	
Corrective Action Implemented (including any evidence submitted)	On 02/14/2018 the evaluation of the evidence sent by the client for the closing of the non-compliance reported during the audit is performed, the client performs the root cause analysis, presents an action plan and its respective actions for the closing of the nonconformity. Action Plan: Establish with the COPASST procedure to reduce the time of investigations and generate mandatory follow-up of investigations with periodic reviews that allow to comply with the times established in resolution 1401. Carry out training for COPASST and the immediate leaders in the field on the functions

	and responsibilities in accident investigations. Evidence and actions taken: Ordinary meeting with COPASST where the procedure to reduce the time of the investigations was defined. COPASST was articulated to guarantee the closure of investigations. Compulsory follow-up of the investigations is generated, revisions are defined for evidence of the closure with those responsible. The management is involved in the follow-up and obligatory nature of the established, through a monthly report on the state of the investigations. Training on COPASST legal update on roles and responsibilities (members of the COPASST-Auxiliary support (immediate heads).) Accountability report for the month of January 2018 was also evidenced and there were reported changes and adjustments in the procedure for the investigation of accidents that must be carried out 4 to 5 days after the event occurred
Date of Response/ Company Representative (Name and Title):	Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Closed by prior CB – Naturacert
Status of NC:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	N/A
Finding: 2018.2	
Select one: <input checked="" type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
Standard Reference	RSPO Principle & Criteria Standard 2013- 5.3.2
Non-Conformity or Observation: During the tour of the waste collection facilities as well as by reviewing the documents of delivery and disposal of hazardous waste it is evident that most of the waste is managed according to the guidelines contemplated in the procedures of the environmental management plan, however, the reuse of agrochemical containers for storage of equipment for work at heights was observed.	
Corrective Action Implemented (including any evidence submitted)	On 02/14/2018 the evaluation of evidences sent by the client for the closure of the non-conformity reported in the present criterion is made, for which an analysis of the cause, action plan and the respective actions to be followed are presented. Action Plan: Create a strategy that facilitates the field review of the containers used by the disease treatment crews. Direct managers are generated in the review of the elements and supplies of the crews to the

	support auxiliaries, who will be in charge of the follow-up and control of the work in the field. Plant health personnel are trained in the identification of hazardous waste and the final disposition procedure of the RESPEL, on 01/23/2018. Evidence of the actions carried out: A specific color and type of container is standardized to store the harness, distinctive color (yellow). The manual is modified SGC-MN-DAG-03 Management of diseases and disorders where the general conditions are specified ITEM 4 It is specified that the equipment for safe work in heights will be stored and transported in yellow plastic containers duly labeled, additionally it was included as responsible the review and compliance with the requirements mentioned in the ITEM 4.a auxiliary support. Training on the proper disposal of hazardous waste stipulated in the document Plan of Comprehensive Management of Solid Waste PGIRS. Delivery of the reused containers to the storage area of RESPEL is recorded on 01-18-2018.
Date of Response/ Company Representative (Name and Title):	Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Closed by prior CB- Naturacert
Status of NC:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	N/A

Finding: 2018.3	
Select one: <input checked="" type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
Standard Reference	RSPO Principle & Criteria Standard 2013- 5.6.1
Non-Conformity or Observation: In the Environmental Management Plan, the mitigation measures or contingency plan for the following cases have not been contemplated: <input checked="" type="checkbox"/> The partially composted rachis deposit was evidenced in Lot 5 of Naranjos, 70 tons since November. incorporated into the crop due to climatic conditions and leachate control has not been carried out, for which no actions are planned for the control or generation of leachates when there is accumulation of empty bunch on the field. During the tour of the area where it is found The wastewater treatment system of the oil extraction plant showed the discharge of sludge from the last section of the treatment to 2 areas which are not included in the environmental management plan for the disposal of this type of waste, taking into account that the use of these	

sludges is only authorized to be used as an amendment to the soil and in the areas of palm cultivation, particularly applied to the dish and lightly applied blades, contrary to the evidence given that in some areas the depth of the mud reached 10 centimeters.	
Corrective Action Implemented (including any evidence submitted)	On 02/14/2018 the evaluation of the evidence sent by the client is made to close the reported non-compliance during the audit, the client presents an analysis of the cause, action plan and evidence of the actions implemented. Action Plan : Define with the directors of agronomy, benefit plant, logistics leader and nutrition coordinator who are in charge of making the disposal of by-products in the crops, which strategies should be contemplated for the disposal of tussock and mud when the climatic conditions are not favorable and document them in the manual SGC-MN-07 Principle 5. RSPO. Evidence of actions taken: It was included in SGC-MN-07 Principle 5. RSPO in number 2.2.1 agricultural activities-soil nutrition activities related to the application of by-products in the field (tussocks, mud) where it is specified that action must be carried out in case the climatic conditions are not favorable for the application in the field. Attached plane related to the temporary deposit of tussocks and photographs of the adaptations implemented in the field of coverage of the material (tussock) with plastic and the construction of perimeter channels for the collection of leachates. Was carried out a socialization with the staff about the Proper Handling of Sludge on 05/02/2018.
Date of Response/ Company Representative (Name and Title):	Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Closed by prior CB- Naturacert
Status of NC:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	N/A

Finding:2018.4	
Select one: <input checked="" type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input checked="" type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): No closure required
Standard Reference	RSPO Principle & Criteria Standard 2013- 4.7.2
Non-Conformity or Observation:	

There were no evidence for the collection of spills in the area of the power plant next to the agrochemical store and general store.

The plots that show the applied areas with agrochemicals do not allow to have the geographical reference that allows to clearly establish that the application distances are respected with respect to bodies of water, protection areas and areas of high conservation values..

3.4 New Nonconformities

Finding:2019.1	
Select one: <input checked="" type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of NC <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): June 21st, 2019
Standard Reference	RSPO Principle & Criteria Standard 2013- (NI-Colombia)- 6.5.2 M
Non-Conformity or Observation: Through worker interviews identified evidence of a worker who had exceeded the maximum allowable work hours, as established in Colombia regulations.	
Corrective Action Implemented (including any evidence submitted)	Evidence on legality and application of resolution No. 026 of 2005 in which overtime issued by the Ministry of Labor is authorized, the terms established by Article 22 of Law 50 of 1990 and Decree 995 of 1968 shall bear the obligation provided by the technical annex (Post-resolution rule that does not repeal and / or modify). In this way, the company has full legality on the current overtime resolution, which can only be repealed by the Ministry of Labor or the Contentious Administrative Judge. The technical concepts of legal advisors are annexed in the same way. There will be an analysis of time and movements to improve the scheduling of shifts in the extraction plant which is planned to be carried out with the adviser Libia Rangel. Instrumentalist selection process is performed.
Date of Response/ Company Representative (Name and Title):	May 29 th , 2019 Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Auditor verified: <ul style="list-style-type: none"> - Technical concept of legal advisors where validity is given to resolution 026 of 2005. - Proposal of the advisor to perform the analysis of time and movements in the extraction plant. - Calls for instrumentalist selection process

Status of NC:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	June 3 rd , 2019 Diana Sepúlveda, Lead Auditor
Finding: 2019.2	
Select one:	<input checked="" type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input type="checkbox"/> Observation
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of NC <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): June 21st, 2019
Standard Reference	RSPO Principle & Criteria Standard 2013 (NI-Colombia)- 4.6.6
Non-Conformity or Observation: <p>On a visit made on 04/10/2019 to the main agrochemical warehouse with Inventory Coordinator and Warehouse Assistant (Francisco Badillo), it was evidenced that the Ridomil product was located on the slightly toxic Class III shelf and the safety sheet specified class II "Moderately toxic" there is no containment dam and the plastic containment stowage for the two cans of the product cosmo oil contained water.</p> <p>The following expired products were found in the transitory Minas storage: Azuco (fungicide) 5 liters in July 2018, microbiol in March 2019 and are about to expire 7 kilos in June 2019.</p>	
Corrective Action Implemented (including any evidence submitted)	<p>Technical sheets and product location updated. The cards to be used will be those supplied by the commercial house of the product to avoid confusion with the chips created by health and safety at work. In order to guarantee the updating and use of the corresponding files that are in the warehouse, monthly inspections by safety and health at work will be scheduled. These actions will be documented in the manual Safe Handling of Chemical Products SGC-MN-DGH-04 and will be socialized to all those responsible for the handling of chemical products.</p> <p>As an improvement action, a reform will be made increasing the current height of the dike by 10 cm, thus guaranteeing a greater capacity in the event of a spill. A galvanized sheet will be placed on the door to prevent the entry of rainwater.</p> <p>Created a procedure related to the purchase and handling of agrochemical products.</p>
Date of Response/ Company Representative (Name and Title):	May 29th, 2019 Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Auditor verified:

	<ul style="list-style-type: none"> - Elimination of the default format of technical safety data sheets implemented for health and safety in the workplace, defined in the manual SGC-MN-DGH-04, the change to the safety data sheets to those supplied by the commercial house. - Inspection report for products in inventory and their safety records. - Photographs of the modifications proposed to the containment dam - Procedure SGC-PR-DAF-17 Purchase and handling of agrochemical products
Status of NC:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	June 3 rd , 2019 Diana Sepúlveda, Lead Auditor

Finding:2019.3	
Select one: <input checked="" type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): June 21 st , 2019
Standard Reference	RSPO Principle & Criteria Standard 2013 (NI-Colombia)- 8.1.1
Non-Conformity or Observation: It was not evident that the impact indicators of the environmental area were up to date, which does not provide verification that the Continuous Improvement Plans are being implemented.	
Corrective Action Implemented (including any evidence submitted)	The work plan related to environmental management was updated by defining the monitoring indicators, adjusting monitoring goals and frequencies. An analysis of the information will be carried out and the necessary actions will be taken to minimize negative impacts. The action plans have included an improvement activity which provides email alerts to those responsible for specific processes. In the case negative impacts are identified, responsible personnel will identify the causes and support the implementation of the actions necessary to prevent reoccurrence.
Date of Response/ Company Representative (Name and Title):	May 29th, 2019 Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Auditor verified: - Table of Impact Indicators- Environmental Management updated
Status of NC:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Date Accepted/ SCS Representative (Name and Title):	June 3rd, 2019 Diana Sepúlveda, Lead Auditor
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Finding: 2019.4	
Select one: <input type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input checked="" type="checkbox"/> Minor NC <input type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
Standard Reference	RSPO Principle & Criteria Standard 2013 (NI-Colombia)- 4.4.1
Non-Conformity or Observation: Nonconformities were found in a) Efficient use of water: Water leaks were detected in the clothes washing area of agrochemical applicators. Indicators of water use per ton of FFB denote a high consumption of water from January to July 2018. A reduction in consumption from August to December 2018 was noted. However, data not available for 2019. b) Avoidance of surface and ground water contamination: To prevent contamination of the soil with the residues of the washing water from agrochemical suits and applicators, a biological bed was built. However, it was evidenced that the biological bed is clogged. In addition, there is no theoretical support to guarantee that this technology is effective to avoid soil contamination by agrochemical residues.	
Corrective Action Implemented (including any evidence submitted)	<u>Leaks in the washing area:</u> Maintenance of the washing equipment by the infrastructure coordination reviewed. Proposed 2020 budget to consider the purchase of a washing machine. <u>Indicators of water use:</u> The environmental management work plan was updated by defining monitoring indicators for water use in the different activities in operation. Through this an analysis of the information will be carried out and the necessary actions will be generated in case of any negative impacts. <u>Surface water pollution:</u> Construction of a new closed circulation system to minimize the risks of water contamination. Construction of a perimeter dike to the area of washing machines to avoid contamination in case of leaks.
Date of Response/ Company Representative (Name and Title):	May 29th, 2019 Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Auditor verified: <ul style="list-style-type: none"> - Photographs of updated equipment maintenance - Matrix of indicators of Impact for the saving and efficient use of updated water. - Design of closed water circulation system and quotation for the construction of the system.

Status of NC:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	June 3rd, 2019 Diana Sepúlveda, Lead Auditor

Finding: 2019.5	
Select one: <input type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input checked="" type="checkbox"/> Minor NC <input type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
Standard Reference	RSPO Principle & Criteria Standard 2013 (NI-Colombia) 5.1.2/5.1.3
Non-Conformity or Observation: The existence of a Management Plan was evidenced. In addition, confirmed during the environmental impact study updated by BIOAP in 2018 and in preliminary diagnosis by Palmas del Cesar. The plan's timeline began in 2016 and was valid until 2018. There is no evidence that the plan is being executed in 2019.	
Corrective Action Implemented (including any evidence submitted)	The work schedule related to the execution of environmental management activities aimed at the prevention, control and reduction of negative environmental impacts and strengthening of positive ones was updated, defining actions and dates of materialization. Include as an activity of improvement in the action plans, the annual notification by way of alerts via email to those responsible for the process, in order to remember the annual projection of activities in joint work with the area of environmental management.
Date of Response/ Company Representative (Name and Title):	May 29th, 2019 Viviana Dueñas Bohórquez Coordinadora de Procesos Transversales
SCS review	Auditor verified: <ul style="list-style-type: none"> - Calendar of activities for the updated environmental management. - SGC-PR-DAF-18 ACTUALIZACIÓN DE INDICADORES Y FORMULACIÓN DE CRONOGRAMA DE ACTIVIDADES AMBIENTALES.pdf Successful implementation to be confirmed by the surveillance audit.
Status of NC:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	June 3rd, 2019 Diana Sepúlveda, Lead Auditor

Finding:2019.6	
Select one: <input type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input checked="" type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Not required to close
Standard Reference	RSPO Principle & Criteria Standard 2013 (NI- Colombia)- 4.8.1
Non-Conformity or Observation: In an interview conducted on 04/10/2019 with the Warehouse Assistant (Alvaro Jimenez), it was evidenced that he enters the main agrochemical warehouse carrying out activities of receipt of products and organization on the shelves. Confirmed with the Director of SST he has received internal training, but has only taken a class with SENA April 2018, of the 60 hour requirement.	
Corrective Action Implemented (including any evidence submitted)	
Date of Response/ Company Representative (Name and Title):	
SCS review	Observation not required to close
Status of NC:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	

Finding:2019.7	
Select one: <input type="checkbox"/> Major NC <input type="checkbox"/> Major NC (upgraded Minor NC) <input type="checkbox"/> Minor NC <input checked="" type="checkbox"/> Observation	
NC/OBS issued to (when more than one site/member):	
Deadline:	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): Not required to close
Standard Reference	RSPO Principle & Criteria Standard 2013 (NI Colombia)- 5.3.3
Non-Conformity or Observation: During the on-site assessment, auditors observed the appropriate disposal of waste and noted pollution sources are minimized.	

However, on a visit to a farm on April 10 th , it was evidenced that waste was mixed, despite having protocols to identify wastes by names/colors. It was also noted that the space allocated for parking tractors/maintenance equipment showed traces of gasoline and fat on the ground.	
Corrective Action Implemented (including any evidence submitted)	
Date of Response/ Company Representative (Name and Title):	
SCS review	Observation not required to close
Status of NC:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above)
Date Accepted/ SCS Representative (Name and Title):	

3.5 Positive Components

We wish to highlight some positive aspects evidenced during the audit:

- The interest and support of high direction in the certification process.
- The transparency and diligence shown by the company to provide truthful information during the audit.
- The state of the facilities, in addition to being very pleasant sites, remain impeccable.
- The conditions of the plantations are excellent, the health, the soil management, in general the agronomic management is impressive.

4. Certified organization's acknowledgement of internal responsibility

4.1 Auditor Recommendation

Certification Recommendation	
Annual Surveillance	
Palmas del Cesar has demonstrated continued conformance to the applicable RSPO standards. The SCS evaluation audit team recommends certification to be maintained subject to subsequent annual audits and Palmas del Cesar's response to any open minor nonconformities.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS RSPO Program evaluation protocols.

Comments: Upon NC closure

4.2 Formal Sign-off of Assessment Findings

Prepared by :	Diana Sepulveda
Verified by :	Kendra Bishop
Date of Submission to RSPO:	June 25 th , 2019

5. Certification Decision

Certification Decision	
Initial Certification Decision:	Palmas del Cesar is in conformance with the RSPO Principles and Criteria Standard (2013), RSPO Colombian National Interpretation (2013), RSPO Supply Chain Certification Standard for Mill (2017) and RSPO Rules on Market Communications & Claims (2019), with the exception of three open major non-conformities, two open minor non-conformities, and two observations. Continued certification is not approved.
Date:	May 29 th , 2019
Final Certification Decision:	Palmas del Cesar is in conformance with the RSPO Principles and Criteria Standard (2013), RSPO Colombian National Interpretation (2013), RSPO Supply Chain Certification Standard for Mill (2017) and RSPO Rules on Market Communications & Claims (2019), with three major non-conformities closed. One minor non-conformity closed and one to be reviewed by the next surveillance audit. Continued certification is approved.
Date:	June 3 rd , 2019
Certification Decision By:	Kendra Bishop

Appendix 1: Required Supporting Documentation

This list provides a record of which supporting documents are required as a part of the audit project.

Auditors: Please indicate the documents that you submitted to SCS upon completion of the audit **by placing an X in the relevant cell**.

Certificate holders: Please note that SCS only sends you this Summary Report. However, all of the items checked below are available upon request.

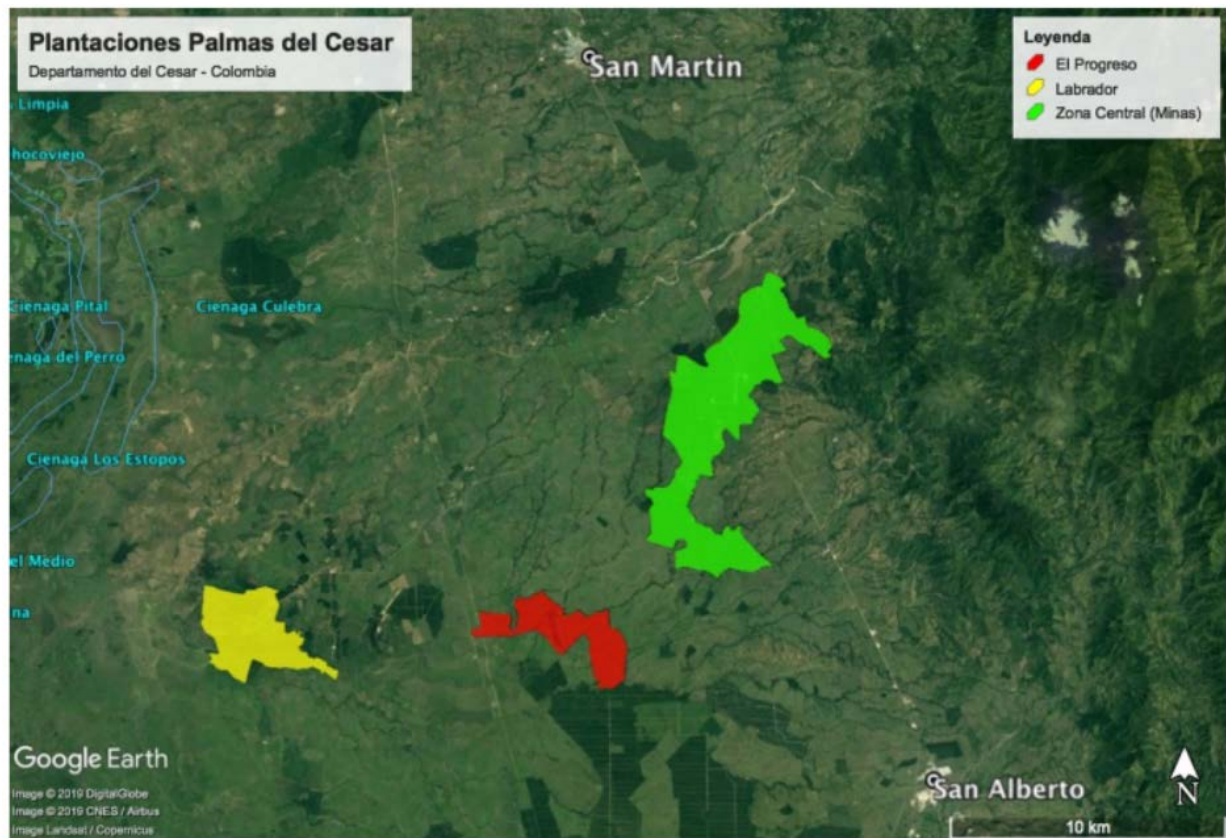
Supporting Document	Submitted to SCS	N/A for this audit project
Audit Plan (Attached as Appendix 2)		
Pre-Audit Assessment		X
Applicable Checklist(s)		
▪ Principles & Criteria Checklist (includes supply chain requirements)	X	
▪ Principles & Criteria Group Checklist		X
▪ New Planting Procedure Checklist		X
▪ New Planting Procedure Verification Statement		X
▪ Principles & Criteria Risk Assessment		X
▪ Outsourcer Risk Assessment		X
▪ RSPO Rules on Market Communications and Claims	X	
▪ Peer Review		X
Signed Record of Closing Meeting	X	
Evidence of conformance for any CARs closed by the auditor		X

Appendix 2: Glossary

Acronym/term	Definition
ASI	Accreditation Services International
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
CSPO	Certified Sustainable Palm Oil
FFB	Fresh Fruit Bunches
HCV	High Conservation Value
PKO	Palm Kernel Oil

PO	Palm Oil
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Appendix 3: Supplemental Map



Appendix 4: Principles & Criteria Checklist

Criterion / Indicator		Assessment Findings	Compliance	
Principle 1: Commitment to Transparency				
Criterion 1.1: Growers and millers provide 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	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making.	Classification of interest groups according to risks and opportunities Group workers, union organization (53% of workers), fruit allies or fruit suppliers, suppliers of products and services, customers (Team Foods and Ecodiesel), shareholders, community (direct), hints, competition, authority and government agencies, trade associations Each stakeholder group has contact, telephone, email (if applicable).	<div><div>X</div><div></div><div></div></div>	<div>C</div> <div>NC</div> <div>C w/Obs</div>
1.1.2 (M)	Records of requests for information and responses shall be maintained.	Reviewed the following: SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS)), includes anonymity, responsible Human Management, have suggestion boxes, COPASST, Labor Committee, Committee of coexistence. SGC-RE GER-19 Registro PQRS: In 2018: 180 community, 8 Internal and 91 Web 91. SGC-RE-DHG-20 Registro control asistencia: 5/16/2016, 06/22/2016, 11/16/2017 Issues social responsibility, ethical code, PQRS, selection process, environmental policies, GIS areas, road safety, SST and community management. Participated Community Action Boards (JAC), educational entities, prosecutor, inspector Lebanon, attended 61 people. PQRS management supports: Fundación Bajo el Palmar manages those of the community (owner Palmas del Cesar)-	<div><div>X</div><div></div><div></div></div>	<div>C</div> <div>NC</div> <div>C w/Obs</div>
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.				
1.2.1 (M)	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none">Land titles/user rights (Criterion 2.2);Occupational health and safety plans (Criterion 4.7);Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);HCV documentation (Criteria 5.2 and 7.3);Pollution prevention and reduction plans (Criterion 5.6);Details of complaints and grievances (Criterion 6.3);Negotiation procedures (Criterion 6.4);	Reviewed: SGC-PR-GER-06 Procedimiento de atención a peticiones, quejas, reconocimientos y sugerencias (PQRS), SGC-MN-DAF-04 Manual de Derechos Consuetudinarios – Manejo de Conflictos – Reparación y Compensación, versión 1. List of properties and their legal supports. SGC-PR-DGH-14 Manual Sistema de Seguridad y Salud en el Trabajo (G-SST) versión 1. SGC-DCGER-11 Política responsabilidad social empresarial, Versión 1. EISA 2016 by Fruto Social de la Palma, followed in 2018 by BIOAP AVC study, carried out by BIOAP.	<div><div>X</div><div></div><div></div></div>	<div>C</div> <div>NC</div> <div>C w/Obs</div>

	<ul style="list-style-type: none">Continual improvement plans (Criterion 8.1);Public summary of certification assessment report;Human Rights Policy (Criterion 6.13).								
Criteria 1.3:									
Growers and millers commit to ethical conduct in all business operations and transactions.									
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.	Reviewed SGC-MN-GER-09 Code of ethics and good governance V2, Communicated in Induction of social responsibility, communities in 2016 and 2017, are on the company's billboards, website, Assistance record 10/30/2017 143 workers talked about COPASST and Coexistence Committee.	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
Principle 2: Compliance with applicable laws and regulations									
Criterion 2.1:									
There is compliance with all applicable local, national and ratified international laws and regulations.									
2.1.1 (M)	Evidence of compliance with relevant legal requirements shall be available.	<p>The legal matrix of the company is divided into four areas: Labor, Health and Safety at Work, Tax and Environmental.</p> <p>These areas have their own procedures and are evaluated in turn by the Ministry of Labor, the DIAN and the environmental corporation.</p> <p>Reviewed: Legal Matrix for each area</p> <p>SGC-RE-SIG-50 v03(Listado de Legislación aplicable - Matriz de Requisitos Legales)</p> <p>SGC-RE-GER-21 v01(Listado de Legislación aplicable - Derecho Laboral)</p> <p>SGC-RE-DAF-80 (Listado de Legislación aplicable - Matriz Legal Tributaria)</p> <p>SGC-RE-DGH-65 v01(Listado de Legislación aplicable - Matriz Requisitos Legales SST)</p> <p>Procedures by area:</p> <p>1. SGC-PR-DGH-18: “Identificación Y Cumplimiento de la Legislación”. v. 01 (Labour)</p> <p>2. SGC-PR-SIG-17: “Procedimiento Identificación, Revisión y Evaluación de Requisitos Legales” v 2(Environmental)</p> <p>3. SGC-PR-DGH-15: “Procedimiento Identificación, Revisión y Evaluación de Requisitos Legales” v 2(HSW)</p> <p>Assessments by Legal entities</p> <p>1. POSITIVA (HSW) VP-RE-ESGSST-04 V4: Evaluación del sistema de gestión de salud y seguridad en el trabajo (made: 17.10.2018)</p> <p>2. CORPOCESAR: PCM-01-F-31 V 1.0 Sistema Integrado de Gestión: Gestión de Evaluación, Control y Seguimiento ambiental- Acta de Diligencia de Inspección (Made 20.12.2018 AutoN°252)</p>	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained.	<p>Reviewed SGC-PR-GER-07: “Identificación Y Cumplimiento de la Legislación”. v. 02</p> <p>Revisions and updates that are made to the matrices were reviewed to ensure compliance and that they are duly updated.</p>	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
2.1.3	A mechanism for ensuring compliance shall be implemented.	<p>Reviewed SGC-PR-GER-07: “Identificación Y Cumplimiento de la Legislación”. v. 02</p> <p>Revisions and updates that are made to the matrices were reviewed</p>	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								

		to ensure compliance and that they are duly updated.	
2.1.4	A system for tracking any changes in the law shall be implemented.	Reviewed SGC-PR-GER-07: "Identificación Y Cumplimiento de la Legislación". v. 02 Revisions and updates that are made to the matrices were reviewed to ensure compliance and that they are duly updated.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Criterion 2.2: 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.			
2.2.1 (M)	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.	Reviewed: property titles, property tax payment, correction of areas based on IGAC data. It should be noted that the areas that appear in the property tiles do not coincide with the areas that appear raised by topography. It must be taken into account that these lands began to be acquired in 1962. Since 1962 until present date there have been changes in the political division of the country, which affects the areas acquired in a negative way that is, there is currently less land than what was purchased. However taxes are paid based on those registered in the public instrument office. A lawyer company is hired to make the correlation and legalization of these lands and demonstrate transparency and legality in the acquisition of the land.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained.	Maps: "Mapa Cedros" 2 de 14 Abril 2014 Observed the physical boundaries that separate the estates of the company with other properties of others. Also in the maps of the farms the delineation of estates and lots is observed.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC).	Not applicable – no land disputes	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A
2.2.4 (M)	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.	Not applicable – no land disputes	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Not applicable – no land disputes	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A
2.2.6 (M)	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.	Reviewed SGC-MN-GER-09 Code of ethics and good governance V2. No evidence found about use of para-militaries and mercenaries in the plantation.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed			

consent.				
2.3.1 (M)	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	Not applicable- no land disputes/ legal customary or user rights identified	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A	
2.3.2	<p>Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land.</p>	Not applicable- no land disputes/ legal customary or user rights identified	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A	
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Not applicable- no land disputes/ legal customary or user rights identified	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A	
2.3.4 (M)	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.	<p>Reviewed:</p> <p>Representatives of current Community Action Boards (JAC): There is a list of JAC presidents, the legality of the resolutions was verified and the Cesar government secretary website was consulted (Minas resolution resolution number 115 recognition of legal personality March 1966, auto 0265 06/13/2016 president Claudia Estrada, Libano President Pablo Hernández, 01/07/2016 to 06/30/2019 Auto 1000 of 05/07/2016 Caño seco President Jose del Carmen Villalba legal personality 003822 of 05/10/1980 period July 2016 to 2020. Period 2016 to 2020, Candelia, La Curva, Aguas Blancas, El Barro (Community action board).</p> <p>Union representatives approved resolution and auditor reviewed collective agreement of 2015 with representative signatures.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs	
Principle 3: Commitment to long-term economic and financial viability				

Criterion 3.1:

There is an implemented management plan that aims to achieve long-term economic and financial viability.

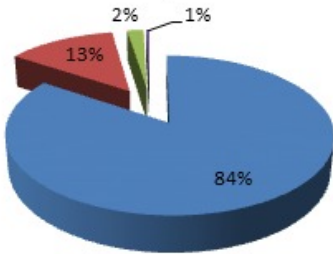
3.1.1 (M)	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.	<p>Reviewed Proyecciones Financieras 2019. Business plan referenced until 2028. Projections include: FFB from various sources. CPO volume, Palm kernel, palm kernel purchases. Percentage of domestic sales, percentage. According Monica Villamin, Financial Manager, numbers are revised every 2 years.</p> <p>Business plan subject to annual review: 30% of FFB from palm oil nucleus and 70% from third party nucleus. 18 agronomist are part of USP. All records are maintained in management review meetings. Includes:</p> <p>Crop projection, to FFB yield trends: Palmas. Del Cesar 90 MT/yr to 20218 92.51 MT/yr. 28 to 36</p> <p>Extraction rates: 21.7% every year</p> <p>Cost of production= cost per MT of CPO. 1, 924,729 average cost per MT of CPO</p> <p>Forecast prices: 2.2346898 pesos colombianos per MT of CPO/. 2912698 pesos colombianos por TN PKO.</p> <p>Income vs. Cost: 2019 4,981.997.773 in 2019 and 7.770.351.615 in 2028.</p> <p>Projected expansion: no expansion until 2021</p> <p>No peat land.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.	<p>Reviewed:</p> <p>Soil Map</p> <p>Plan de Renovación 2015 -2020</p> <p>SGC-RE-GER-16 – v.03 ACTA DE REUNIÓN: Aprobación de Plan de Renovación de Cultivos 10.03.16</p> <p>SGC-RE-DAG-04 v.08 REGISTRO ACTUALIZACIÓN DE ÁREAS (Last updated 14.02.2019), was reviewed Version 07 (2015, 2016, 2017, 2018)</p> <p>According to the revised maps, it was evidenced that there aren't fragile soils</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

Principle 4: Use of appropriate best practices by growers and millers**Criterion 4.1:**

Operating procedures are appropriately documented, consistently implemented and monitored.

4.1.1 (M)	Standard Operating Procedures (SOPs) for estates and mills are documented.	<p>Reviewed:</p> <p>SGC-PR-DAG-1 Establecimiento de Cultivos</p> <p>SGC-PR-DAG-2 v11 Mantenimiento de Cultivos</p> <p>SGC-PR-DAG-3 Cosecha de RFF</p> <p>SGC-PR-DAG-9 Vivero para producción de plántulas de palma</p> <p>SGC-PR-DAG-10 Infraestructura DAG</p> <p>Reviewed database, Sistema Integrado de Gestión. Auditor reviewed list of SOPs which includes: Mill key process, harvesting, logistics, and SCC manual. All SOPs are available on-line through Sistema Integrado de Gestión, available to all administrative personnel. Spanish is the official language. Training records available at each business unit. Process SOP maintained at mill offices. Plantation SOPs available at Plantation offices. Evidence of training records</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
4.1.2	A mechanism to check consistent implementation of procedures shall be in	Auditor reviewed list of SOPs located on-line through database: Sistema Integrado de Gestion. Changes to SOPs are managed by	<input checked="" type="checkbox"/> X <input type="checkbox"/>	C NC

	place.	<p>Quality department, further authorized by each Area Director. Once approved, SOP is uploaded to Sistema Integrado de Gestion.</p> <p>According to Zoraima Ardila, Quality coordinator, Quality implements an internal audit program. Internal auditors are qualified as a minimum ISO 9001 auditor. Auditor reviews audit plan, located in Sistema Integrado de Control. Internal audit program includes: HR, occupational health and safety, supplier technical assistance, logistics, FFB receipt, Extraction, production. A total of 18 control points. In addition, database includes action plans for corrective actions</p> <p>Records reviewed:</p> <ol style="list-style-type: none"> 1. SGC-RE-DAG-23 v 06: Programación y resultados del personal de apoyo en actividades del proceso de producción de RFF (dates: 09.04.2019 Supervisor Johan Sebastian Malaver- 04.04.2019 (Solución a reporte del 03.04) SV: Jazmin Salcedo – 03.04.2019 (reporte) 2. SGC-RE-DAG-15 v04: Programa de Fertilización 3. SGC-RE-DAG-42 v02: unidades de Muestreo Foliar y de Suelos 4. SGC-DE-DAG-02 (Documento Externo): Guía para el muestreo Foliar y de suelos en cultivos de palma de suelos 	<input type="checkbox"/>	C w/Obs
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate.	<p>Auditor reviewed list of SOPs located on-line through database: Sistema Integrado de Gestion. Changes to SOPs are managed by Quality department, further authorized by each Area Director. Once approved, SOP is uploaded to Sistema Integrado de Gestion.</p> <p>According to Zoraima Ardila, Quality coordinator, Quality implements an internal audit program. Internal auditors are qualified as a minimum ISO 9001 auditor. Auditor reviews audit plan, located in Sistema Integrado de Control. Internal audit program includes: HR, occupational health and safety, supplier technical assistance, logistics, FFB receipt, Extraction, production. A total of 18 control points. In addition, database includes action plans for corrective actions</p> <p>Records reviewed:</p> <ol style="list-style-type: none"> 1. SGC-RE-DAG-23 v 06: Programación y resultados del personal de apoyo en actividades del proceso de producción de RFF (dates: 09.04.2019 Supervisor Johan Sebastian Malaver- 04.04.2019 (Solución a reporte del 03.04) SV: Jazmin Salcedo – 03.04.2019 (reporte) 2. SGC-RE-DAG-15 v04: Programa de Fertilización 3. SGC-RE-DAG-42 v02: unidades de Muestreo Foliar y de Suelos 4. SGC-DE-DAG-02 (Documento Externo): Guía para el muestreo Foliar y de suelos en cultivos de palma de suelos 	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
4.1.4 (M)	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).	<p>Reviewed approved FFB supplier list, total of 321. Reviewed training records for 'rsop ready' providers. During the past 3 years around 100 providers have received training, about 15 year each. Reviewed SOP. Reviewed receiving record 0093, date 10/04/19 for Provider Madre Tierra. Included weigh bridge tickets, total received 13010 kg. Verified daily summary, amounts verified.</p> <p>Further verified during interview with Edgar Cepeda, USP (Unidad de Servicio al Proveedor) Lead. Review of procedures, records and interview confirms compliance.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.				
4.2.1	There shall be evidence that good	Reviewed Document: "ATENCIÓN DE SUELOS Y CULTIVOS	<input checked="" type="checkbox"/> X	C

	agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.	<p>SEMBRADOS EN TOPOGRAFIAS CON PENDIENTES": Topographic survey of all the lots to know the slope, then these were classified, this information was crossed with the data of precipitation, relative humidity and temperature and based on it a soil management plan was defined, in addition it was taken into account the characteristic of those soils.</p> <p>As a strategy, trails for bunches collection were defined, the organic fertilization plan gives priority to this type of soils, the coverage is maintained, the payment to the harvesters is different encouraging them to make friendly management practices.</p>	<input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
		<p>Areas de cultivos con pendientes</p>  <p>■ Menor a 9° ■ 9,1 a 15° ■ 15,1 a 25° ■ > a 25°</p>	
4.2.2	Records of fertiliser inputs shall be maintained.	<p>Reviewed:</p> <p>SGC-RE-DAG 17 v 03: Seguimiento del Programa de Fertilizacióm</p> <p>The date of the last soils samples: 28.02.2017 (results) cod. 517-1428 Report N° 14335 (The samples are taken every 2 years)</p> <p>The date of the last tissue sample: 09.05.2018 Report N°16037 (The samples are taken every Year)</p> <p>The quantities of fertilizer applied in 2018, records of fertilizer usage per tonne of FFB production, specific types of fertilizers.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.	<p>Reviewed:</p> <p>SGC-RE-DAG 17 v 03: Seguimiento del Programa de Fertilizacióm</p> <p>The date of the last soils samples: 28.02.2017 (results) cod. 517-1428 Report N° 14335 (The samples are taken every 2 years)</p> <p>The date of the last tissue sample: 09.05.2018 Report N°16037 (The samples are taken every Year)</p> <p>The quantities of fertilizer applied in 2018, records of fertilizer usage per tonne of FFB production, specific types of fertilizers.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.	<p>Reviewed:</p> <p>Estrategia de Reciclaje de Nutrientes Act. Marzo 2019</p> <p>"Plan y Seguimiento fertilización orgánica 2019" Explain disposal and Budget for application of EBF, boiler ashes, Mud on the ground.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			
4.3.1 (M)	Maps of any fragile soils shall be available.	<p>There is a Soil Map (April 2014), don't appears fragile soils.</p> <p>The company has soil maps of each of the agronomic management units, as well as through field trip it was evidenced that there are no fragile soils or peat soils, however, the plantation identifies and makes a special handling for soils with slope between 15 and 25% that represent 2% of the total area of the crop, and those superior to 25% that represent 1% of the total area of the crop by means of the</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs

		management of vegetal cover, and the contribution of the residues of harvest , empty fruit bunches and sludge generated in the oil extraction process.		
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).	Reviewed Document: “ATENCIÓN DE SUELOS Y CULTIVOS SEMBRADOS EN TOPOGRAFIAS CON PENDIENTES”: Topographic survey of all the lots to know the slope, then these were classified, this information was crossed with the data of precipitation, relative humidity and temperature and based on it a soil management plan was defined, in addition it was taken into account the characteristic of those soils. As a strategy, trails for bunches collection were defined, the organic fertilization plan gives priority to this type of soils, the coverage is maintained, the payment to the harvesters is different encouraging them to make friendly management practices.	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
4.3.3	A road maintenance programme shall be in place.	Reviewed: SGC-RE-DAG-63 SEGUIMIENTO Y CONTROL DE OBRAS DE INFRAESTRUCTURA EN CULTIVOS	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
4.3.4 (M)	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.	Reviewed: Maps, soil analysis, field verification. No evidence of peat soils.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	C NC C w/Obs N/A
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.	Reviewed: Maps, soil analysis, field verification. No evidence of peat soils.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	C NC C w/Obs N/A
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).	Reviewed: Soil Map Plan de Renovación 2015 -2020 SGC-RE-GER-16 – v.03 ACTA DE REUNIÓN: Aprobación de Plan de Renovación de Cultivos 10.03.16 SGC-RE-DAG-04 v.08 REGISTRO ACTUALIZACIÓN DE ÁREAS (Last updated 14.02.2019), was reviewed Version 07 (2015, 2016, 2017, 2018) According to the revised maps, it was evidenced that there aren't fragile soils	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 4.4:				
Practices maintain the quality and availability of surface and ground water.				
4.4.1	An implemented water management plan shall be in place.	Nonconformities were found in a) Efficient use of water: Water leaks were detected in the clothes washing area of agrochemical applicators. Indicators of water use per ton of FFB denote a high consumption of water from January to July 2018. A reduction in consumption from August to December 2018 was noted. However, data not available for 2019. b) Avoidance of surface and ground water contamination: To prevent contamination of the soil with the residues of the washing water from agrochemical suits and applicators, a biological bed was built. However, it was evidenced that the biological bed is clogged. In addition, there is no theoretical support to guarantee that this technology is effective to avoid soil contamination by agrochemical residues. Reviewed program de ahorro y uso eficiente de agua, SGC-MN-SIG-	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		<p>04. Version 1. Procedure details plantation water management best practices. In addition, the manual includes industrial water usage and control mechanisms.</p> <p>Identification: Quebrada La Rosita, Quebrada Minas as superficial waters. Two wells, one for plantation and one for industrial process.</p> <p>Renewability: At extraction mill</p> <p>Impacts on catchment area: No impact identified with local stakeholders</p> <p>Access to clean drinking water: No governmental concession for drinking water. Drinking water is available by third party contract in 5 gallon containers. Available to all stakeholders.</p>																																										
4.4.2 (M)	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.	<p>As a method to avoid contamination of the water table by chemical residues from the agrochemical showers and the laundry area where the uniforms of the agrochemical applicators are washed, there is a biological bed.</p> <p>This biological bed has been elaborated based on the indications found in the document: ARD-ARnD Permiso de Vertimientos Palmas del Cesar Presented to CORPOCESAR (oct.2016) P.20</p> <p>Evidence: “PLAN PARA LA ATENCION DE ZONAS DE AMORTIGUAMIENTO EN PALMAS DEL CESAR” This document establishes a planting plan to reinforce the buffer zones of water sources.</p> <p>They started in 2015, with planting in the Minas creek using 6 native species: Ochroma pyramidale, Cedrela odorata, Ceiba pentandra, Jacaranda caucana, Guazuma ulmifolia, Guadua, Cassia reticulata, Hibiscus rosa</p> <p>The lots were identified by which water sources were rounded and nursery maintenance costs were calculated and an action plan was created to maintain the buffer zones.</p> <table border="1"> <thead> <tr> <th>N°</th><th>ACTIVIDAD</th><th>FRECUENCIA</th><th>EVIDENCIA</th><th>RESPONSABLE</th></tr> </thead> <tbody> <tr> <td>1</td><td>Se demarcaran las palmas que se encuentren ubicadas dentro de las zonas de amortiguamiento de fuentes hídricas</td><td>N.A</td><td>Marcación en los lotes Marcación en planos</td><td>Dirección agronómica</td></tr> <tr> <td>2</td><td>Las palmas identificadas en la zona de amortiguamiento se incluirán en la actualización de áreas.</td><td>> a 1 año</td><td>Actualización de áreas</td><td>Dirección agronómica</td></tr> <tr> <td>3</td><td>En las palmas demarcadas no se realiza aplicación de fertilizantes químicos, se incluyen en manejo con fertilización orgánica</td><td>> a 1 año</td><td>Plan de fertilización orgánica</td><td>Dirección Agronómica</td></tr> <tr> <td>4</td><td>Cuando sea necesario se erradicarán palmas para dar paso al crecimiento de vegetación.</td><td>Proyectada a dos años</td><td>Soportes de siembra de árboles.</td><td>Dirección agronómica</td></tr> <tr> <td>5</td><td>No se utilizan herbicidas para labores de mantenimiento de cultivos.</td><td>periódica</td><td>SGC-RE-SGC-40</td><td>Dirección agronómica</td></tr> <tr> <td>7</td><td>Palmas que presenten enfermedades que generen problemas sanitarios graves, serán erradicadas.</td><td>1 año</td><td>Documentación disponible.</td><td>Dirección agronómica.</td></tr> <tr> <td>8</td><td>En el momento de renovar los cultivos, se aplicara las normas vigentes para las distancias establecidas en zonas de amortiguamiento.</td><td>A ejecutar en zonas a renovar</td><td>Documentación disponible.</td><td>Dirección agronómica</td></tr> </tbody> </table>	N°	ACTIVIDAD	FRECUENCIA	EVIDENCIA	RESPONSABLE	1	Se demarcaran las palmas que se encuentren ubicadas dentro de las zonas de amortiguamiento de fuentes hídricas	N.A	Marcación en los lotes Marcación en planos	Dirección agronómica	2	Las palmas identificadas en la zona de amortiguamiento se incluirán en la actualización de áreas.	> a 1 año	Actualización de áreas	Dirección agronómica	3	En las palmas demarcadas no se realiza aplicación de fertilizantes químicos, se incluyen en manejo con fertilización orgánica	> a 1 año	Plan de fertilización orgánica	Dirección Agronómica	4	Cuando sea necesario se erradicarán palmas para dar paso al crecimiento de vegetación.	Proyectada a dos años	Soportes de siembra de árboles.	Dirección agronómica	5	No se utilizan herbicidas para labores de mantenimiento de cultivos.	periódica	SGC-RE-SGC-40	Dirección agronómica	7	Palmas que presenten enfermedades que generen problemas sanitarios graves, serán erradicadas.	1 año	Documentación disponible.	Dirección agronómica.	8	En el momento de renovar los cultivos, se aplicara las normas vigentes para las distancias establecidas en zonas de amortiguamiento.	A ejecutar en zonas a renovar	Documentación disponible.	Dirección agronómica	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
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4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and	<p>Reviewed effluent treatment process. Effluent treatment includes a series of 11 ponds. Total residence time of 120 days.</p> <p>No chemical treatment observed. After 11 pond, effluent is discharged to “Quebradita la Rosita”. Reviewed effluent discharged by CORCESAR. Water capture is done at Quebradita “La Rosita” and Quebrada “Minas”, well water capture for cafeteria usage and permit</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs																																								

	5.6).	<p>for gaseous emissions.</p> <p>Reviewed Lab Analysis done by certified laboratory (IDEAM) done 08-17 august 2018. DBO of 54.5,(max by NI of 600) DQO of 560 (max by NI 1,500), total suspended solids 61.6 (max by NI of 400).</p> <p>Water discharge in compliance with national regulations. Reviewed license issued by CORCESAR for effluent discharge.</p> <p>Reviewed, document titled: Indicadores Unitario de Consumo Global de Agua Linea 1 linea 2. Database includes water consumption per MT of FFB. 2018 shows 1.59 m3 per MT of FFB. Reviewed, Programa Ahorro y uso eficiente del Agua</p>		
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.	<p>Reviewed effluent treatment process. Effluent treatment includes a series of 11 ponds. Total residence time of 120 days.</p> <p>No chemical treatment observed. After 11 pond, effluent is discharged to “Quebradita la Rosita”. Reviewed effluent discharged by CORCESAR. Water capture is done at Quebradita “La Rosita” and Quebrada “Minas”, well water capture for cafeteria usage and permit for gaseous emissions.</p> <p>Reviewed Lab Analysis done by certified laboratory (IDEAM) done 08-17 august 2018. DBO of 54.5,(max by NI of 600) DQO of 560 (max by NI 1,500), total suspended solids 61.6 (max by NI of 400).</p> <p>Water discharge in compliance with national regulations. Reviewed license issued by CORCESAR for effluent discharge.</p> <p>Reviewed, document titled: Indicadores Unitario de Consumo Global de Agua Linea 1 linea 2. Database includes water consumption per MT of FFB. 2018 shows 1.59 m3 per MT of FFB. Reviewed, Programa Ahorro y uso eficiente del Agua</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.				
4.5.1 (M)	Implementation of Integrated Pest Management (IPM) plans shall be monitored.	<p>Reviewed:</p> <p>SGC-MN-DAG-08 v.03: MANUAL MANEJO INTEGRADO DE PLAGAS Y ENFERMEDADES. This document has two chapters</p> <p>1. PESTS</p> <p>Include: Biological control, with a table indicates de mains natives fungus used as biological control.</p> <p>Describe Cultural control, ethiological control, and finally, the chemical control strategic.</p> <p>They used two criteriums: Critical index (maximum pest population allowed on the sheet) and percentage of defoliation.</p> <p>With that criteriums they take the decision about the time and kind control.</p> <p>2. DISEASES and DISTURBANCES</p> <p>Types of treatments: chemicals, cultures and biologicals</p> <p>Does it help in reducing the use of chemicals over a period of time? - Minimization of pesticide use</p> <p>Their IPM plan allows them to progressively decrease their use of agrochemicals. However, the climatic changes in the plan favor the incidence of pests and diseases (Reference: Indicador Unidad Sanidad Vegetal – Participación Tipo de Control)</p> <p>There is no prophylactic use of agrochemicals, the recommendations of these are made based on the indicators mentioned above and the use of chemical alternatives.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		<p>The IPM Plan considers all pests and diseases of all stages of the crop, therefore it is applied and adapted to any change.</p> <p>SGC-MN-DAG-02 v05 LECTURA DE PLAGAS, ENFERMEDADES Y DISTURBIOS</p> <p>SG-RE-DAG-59 v08 SEGUIMIENTO DE PLAGAS: According to the manual, a monthly census by lot must be carried out, unless the dynamics of the population force to carry out more evaluations in the month.</p> <p>Lot 97HP 17: 14.01.19 (Verification); 15.02.19 (Reading); 22.02.19 (Monitoring)</p> <p>Reading: 1 plant/ha</p> <p>Verification: =< 1 plant/ha</p> <p>Monitoring: less than 1 plant/ha</p>		
4.5.2	Training of those involved in IPM implementation shall be demonstrated.	<p>Communicate corporate social responsibility policies in the induction of personnel, annual training plan, evidence of basic concepts and RSPO policies training (30/10/2017 and 21/02/2018 José Lizarazo, 30/11/2017 Edison Garcés, 2019 training plan includes RSPO policies and concepts 02/19/2019 and reintroduction to all staff November 2019).</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, , workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>In inductions to the entry of new personnel, incidents and accidents at work are included, hazard matrix.</p> <p>SGSST 2019-SG.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment.				
4.6.1 (M)	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non- target species shall be used where available.	<p>Reviewed</p> <p>SGC-MN-DAG-08 v.03: MANUAL MANEJO INTEGRADO DE PLAGAS Y ENFERMEDADES. Annex 1Lista de Productos Prohibidos, Record use of pesticides. No evidence of the use the use of prohibited protection products.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
4.6.2 (M)	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.	<p>Reviewed</p> <p>SGC-MN-DAG-08 v.03: MANUAL MANEJO INTEGRADO DE PLAGAS Y ENFERMEDADES. Annex 1Lista de Productos Prohibidos, Record use of pesticides. No evidence of the use the use of prohibited protection products.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
4.6.3 (M)	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.	<p>Reviewed:</p> <p>SGC-MN-DAG-08 v.03: MANUAL MANEJO INTEGRADO DE PLAGAS Y ENFERMEDADES. This document has two chapters</p> <p>1. PESTS</p> <p>Include: Biological control, with a table indicates de mains natives fungus used as biological control.</p> <p>Describe Cultural control, ethiological control, and finally, the chemical control strategic.</p> <p>They used two criteriums: Critical index (maximum pest population allowed on the sheet) and percentage of defoliation.</p> <p>With that criteriums they take the decision about the time and kind control.</p> <p>2. DISEASES and DISTURBANCES</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>

		<p>Types of treatments: chemicals, cultures and biologicals</p> <p>Does it help in reducing the use of chemicals over a period of time? - Minimization of pesticide use</p> <p>Their IPM plan allows them to progressively decrease their use of agrochemicals. However, the climatic changes in the plan favor the incidence of pests and diseases (Reference: Indicador Unidad Sanidad Vegetal – Participación Tipo de Control)</p> <p>There is no prophylactic use of agrochemicals, the recommendations of these are made based on the indicators mentioned above and the use of chemical alternatives.</p> <p>The IPM Plan considers all pests and diseases of all stages of the crop, therefore it is applied and adapted to any change.</p> <p>SGC-MN-DAG-02 v05 LECTURA DE PLAGAS, ENFERMEDADES Y DISTURBIOS</p> <p>SG-RE-DAG-59 v08 SEGUIMIENTO DE PLAGAS: According to the manual, a monthly census by lot must be carried out, unless the dynamics of the population force to carry out more evaluations in the month.</p> <p>Lot 97HP 17: 14.01.19 (Verification); 15.02.19 (Reading); 22.02.19 (Monitoring)</p> <p>Reading: 1 plant/ha</p> <p>Verification: =< 1 plant/ha</p> <p>Monitoring: less than 1 plant/ha</p>		
4.6.4	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, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.	<p>Reviewed:</p> <p>SGC-MN-DAG-08 v.03: MANUAL MANEJO INTEGRADO DE PLAGAS Y ENFERMEDADES.</p> <p>During the visit to the agrochemical storage warehouses, the presence of agrochemicals of Pesticide categories type 1A and 1B was not evident.</p> <p>Also, when reviewing the application records, recommendations by the agronomists, it was not evident that this type of products were used.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
4.6.5 (M)	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).	<p>Reviewed:</p> <p>SGC-MN-DAG-08 v.03: MANUAL MANEJO INTEGRADO DE PLAGAS Y ENFERMEDADES. Annex 1Lista de Productos Prohibidos, Record use of pesticides.</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, , workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
4.6.6 (M)	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).	<p>On a visit made on 04/10/2019 to the main agrochemical warehouse with Inventory Coordinator and Warehouse Assistant (Francisco Badillo), it was evidenced that the Ridomil product was located on the slightly toxic Class III shelf and the safety sheet specified class II "Moderately toxic" there is no containment dam and the plastic containment stowage for the two cans of the product cosmo oil contained water.</p> <p>The following expired products were found in the transitory Minas winery: Azuco (fungicide) 5 liters in July 2018, microbiol in March 2019 and are about to expire 7 kilos in June 2019.</p>	<input type="checkbox"/> <input checked="" type="checkbox"/> X <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>

4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts.	<p>Reviewed</p> <p>SGC-MN-DGH-04 Manual manejo seguro de productos agroquímicos versión 3.</p> <p>SG-PR-DGH-17 Procedimiento identificación de peligros y valoración de riesgos e identificación de controles versión 01.</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>They have the sites use the MSDS of the agrochemicals (warehouses of agrochemicals, both main and transitory), have a list of substances prohibited by the OMSO and treaty of Rotterdam.</p> <p>In inductions to the entry of new personnel, incidents and accidents at work are included, hazard matrix.</p> <p>The two warehouse Aux (Francisco Badillo and Alvaro Jiménez), inventory coordinator (Oscar López) and two health assistants (José Javier Rodríguez and Edison Garcés) are interviewed, they all know the dangers to which they are exposed, they have the MSDS of the products that are being applied).</p> <p>Record reviewed: In 2019, as of April, they are carrying out the course of responsible handling of agrochemicals of the 60 hours of SENA. The interviewees had the course except Alvaro Jiménez who is doing it.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
4.6.8 (M)	Pesticides shall be applied aially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.	<p>Reviewed</p> <p>SGC-MN-DGH-04 Manual manejo seguro de productos agroquímicos versión 3.</p> <p>SG-PR-DGH-17 Procedimiento identificación de peligros y valoración de riesgos e identificación de controles versión 01.</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>They have the sites use the MSDS of the agrochemicals (warehouses of agrochemicals, both main and transitory), have a list of substances prohibited by the OMSO and treaty of Rotterdam.</p> <p>In inductions to the entry of new personnel, incidents and accidents at work are included, hazard matrix.</p> <p>The two warehouse Aux (Francisco Badillo and Alvaro Jiménez), inventory coordinator (Oscar López) and two health assistants (José Javier Rodríguez and Edison Garcés) are interviewed, they all know the dangers to which they are exposed, they have the MSDS of the products that are being applied).</p> <p>Record reviewed: In 2019, as of April, they are carrying out the course of responsible handling of agrochemicals of the 60 hours of SENA. The interviewees had the course except Alvaro Jiménez who is doing it.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).	<p>Reviewed</p> <p>SGC-MN-DGH-04 Manual manejo seguro de productos agroquímicos versión 3.</p> <p>SG-PR-DGH-17 Procedimiento identificación de peligros y valoración de riesgos e identificación de controles versión 01.</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		<p>Silva SST).</p> <p>They have the sites use the MSDS of the agrochemicals (warehouses of agrochemicals, both main and transitory), have a list of substances prohibited by the OMSO and treaty of Rotterdam.</p> <p>In inductions to the entry of new personnel, incidents and accidents at work are included, hazard matrix.</p> <p>The two warehouse Aux (Francisco Badillo and Alvaro Jiménez), inventory coordinator (Oscar López) and two health assistants (José Javier Rodríguez and Edison Garcés) are interviewed, they all know the dangers to which they are exposed, they have the MSDS of the products that are being applied).</p> <p>Record reviewed: In 2019, as of April, they are carrying out the course of responsible handling of agrochemicals of the 60 hours of SENA. The interviewees had the course except Alvaro Jiménez who is doing it.</p>		
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).	<p>Record: SGC-RE-DGH-20 v06 CONTROL DE ASISTENCIA:</p> <p>Subject:</p> <p>Plan de Gestión Integral de Residuos Sólidos. Date: 22.12.2018 (1 hour)</p> <p>Plan de Manejo Ambiental. Date: 09.01.2019. (0,5 hour)</p> <p>Plan de Manejo Ambiental Principio 5. Date: 18.01.2019 (1 hour)</p> <p>Cadena de Gestión de Residuos Peligrosos. Date: 18.02.2019 (1.5 hoour)</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
4.6.11 (M)	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.	<p>The company has a list of personnel that handles agrochemicals.</p> <p>Records reviewed:</p> <p>Alvaro José Jiménez Duarte (Warehouse Assistant) is interviewed Rational management of pesticides 09/04/2019 SENA (first class), they have given training on the part of American Rescue SAS 17/10/2018 Safe handling of chemical substances of the GHS (carried out February 2019 valid for 3 months), globally harmonized system, labeling, safety data sheets, storage.</p> <p>Occupational exams for workers handling agrochemicals on an annual basis:</p> <p>Pedro Antonio Maldonado performed cholinesterase with normal result 11/14/2018,</p> <p>Vilma Ruth Navarro was in health until June 2017 was passed to nursery and then to fruit collection for abnormal results in cholinesterase they have followed up 06/28/2018, 11/07/2018, 03/04/2019.</p> <p>Jaime Gomez (harvest) 11/15/2018.,</p> <p>Pedro Maldonado (health) 11/14/2018,</p> <p>They have a shower for emergencies, the water is collected in a cement tank confirmed via interview with Mr. Henry Ortega that water is collected to the biological bed of Hipilandia.</p> <p>SGC-RE-DGH-85 Matriz de elementos de protección individual. From the first day of work they give rubber boots and in health work each time they are damaged they are replaced, reports Yady SST Director and is validated in the field interview (Jose Javier Rodríguez and Edison Garcés).</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros update 12/01/2018,, workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>Profesiograma in preparation with the ARL.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>

4.6.12 (M)	No work with pesticides shall be undertaken by pregnant or breastfeeding women.	<p>The company has a list of personnel that handles agrochemicals.</p> <p>Records reviewed:</p> <p>Alvaro José Jiménez Duarte (Warehouse Assistant) is interviewed Rational management of pesticides 09/04/2019 SENA (first class), they have given training on the part of American Rescue SAS 17/10/2018 Safe handling of chemical substances of the GHS (carried out February 2019 valid for 3 months), globally harmonized system, labeling, safety data sheets, storage.</p> <p>Occupational exams for workers handling agrochemicals on an annual basis:</p> <p>Pedro Antonio Maldonado performed cholinesterase with normal result 11/14/2018,</p> <p>Vilma Ruth Navarro was in health until June 2017 was passed to nursery and then to fruit collection for abnormal results in cholinesterase they have followed up 06/28/2018, 11/07/2018, 03/04/2019.</p> <p>Jaime Gomez (harvest) 11/15/2018.,</p> <p>Pedro Maldonado (health) 11/14/2018,</p> <p>They have a shower for emergencies, the water is collected in a cement tank confirmed via interview with Mr. Henry Ortega that water is collected to the biological bed of Hipilandia.</p> <p>SGC-RE-DGH-85 Matriz de elementos de protección individual. From the first day of work they give rubber boots and in health work each time they are damaged they are replaced, reports Yady SST Director and is validated in the field interview (Jose Javier Rodríguez and Edison Garcés).</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros update 12/01/2018,, workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>Profesiograma in preparation with the ARL.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented.				
4.7.1 (M)	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.	<p>SGC-RE-DGH-17 Manual Seguridad y Salud en el trabajo SG-SST versión 1.</p> <p>Integrated management policy approved May 2017 legal representative "IN PALMAS DEL CESAR S.A we are committed to the safety and health of our employees and the well-being of all those who directly or indirectly intervene in our processes; through the management of occupational risks. We have competent human talent, this being our most valuable resource. We work every day in the prevention of work accidents and occupational diseases, we provide the necessary resources for the training of our collaborators, generating culture towards safety and ensuring compliance with all applicable laws and regulations in Colombia, as well as our internal procedures under a continuous improvement approach.</p> <p>SGC-DC-GER-11 Política de responsabilidad social empresarial Version 1 that says "For no reason is the work of women in pregnancy or lactation in tasks that require the use of agrochemicals allowed." We respect the reproductive rights of all, especially women "</p> <p>Reglamento de higiene y seguridad industrial approved May 2017 by legal representative.</p> <p>Política de prevención para el consumo de alcohol y drogas, industrial approved May 2017 by legal representative.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		<p>POSITIVA (ARL) VP-RE-ESGSST-04 V4: Evaluación del sistema de gestión de salud y seguridad en el trabajo (made: 17.10.2018)</p> <p>This All policies published on billboards of administrative offices, in the administrative offices of the plantations, web page.</p> <p>Psychosocial risk battery: January 2019 average staff plant 662 workers.</p>							
4.7.2 (M)	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.	<p>Reviewed</p> <p>SGC-RE-DGH-85 Matriz de elementos de protección individual</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros update 12/01/2018, workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>Profesiograma in preparation with the ARL.</p> <p>Have suggestion boxes, COPASST, Labor Committee, and Committee of coexistence.</p>	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
4.7.3 (M)	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.	<p>Communicate corporate social responsibility policies in the induction of personnel, annual training plan, evidence of basic concepts and RSPO policies training (30/10/2017 and 21/02/2018 José Lizarazo, 30/11/2017 Edison Garcés, 2019 training plan includes RSPO policies and concepts 02/19/2019 and reintroduction to all staff November 2019).</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, , workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>In inductions to the entry of new personnel, incidents and accidents at work are included, hazard matrix.</p> <p>SGSST 2019-SG.</p>	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
4.7.4 (M)	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.	<p>Reviewed</p> <p>SGC-RE-DGH-85 Matriz de elementos de protección individual</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros update 12/01/2018, workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>Profesiograma in preparation with the ARL.</p> <p>Have suggestion boxes, COPASST, Labor Committee, and Committee of coexistence.</p>	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.	<p>Procedure of accidents and work incidents. At the end of 2018, the closure of 22 labor accident investigations was pending.</p> <p>Accident registry: 2017: 414 cases, 2018: 330 cases, 2019 with cut-off to March 81</p> <p>Corrective actions: They hired DME company and have a schedule Inspection of jobs for administrative staff, protocol for raising bunches, creation of pauses, active pauses, prevention of postural hygiene, training prevention, handling charges for extractor plant, ergonomics training in offices and follow-up to the IPT staff and reincorporation. Budget \$ 8,090,000.</p> <p>Created with ARL Positive administrative technical panel 11/02/2019.</p> <p>Manual tools sharpening process</p> <p>They have signaling of evacuation routes, plans for evacuation, emergency plan.</p>	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
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4.7.6	All workers shall be provided with	All employees affiliated with EPS and ARL	<table><tr><td>X</td><td>C</td></tr></table>	X	C				
X	C								

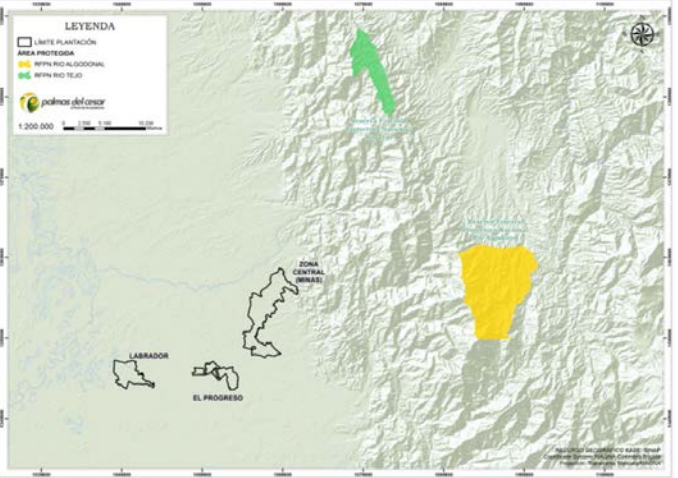
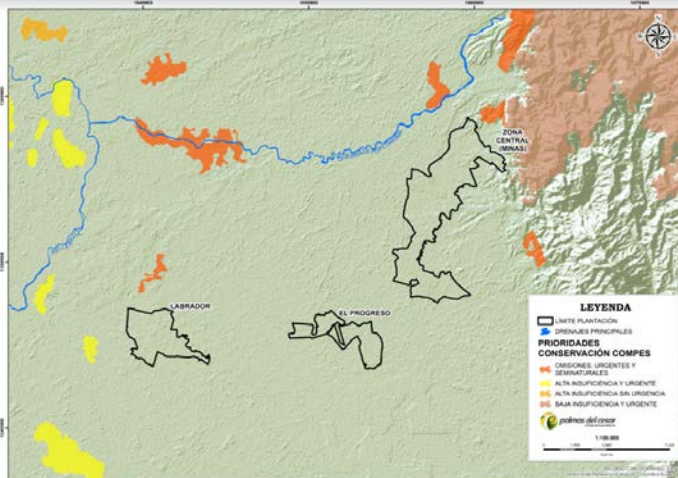
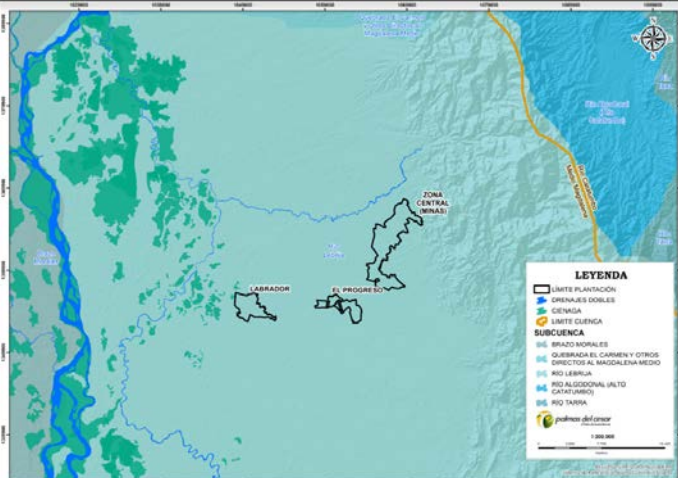
	medical care, and covered by accident insurance.	<p>They have infirmary for first aid attention.</p> <p>LTA indicator: 2018 the goal of 4.5 was not achieved, it decreased compared to the previous 2 years.</p> <p>Indicator of absenteeism: Although it decreased, it did not raise the goal of 3.5.</p> <p>Report of conclusions and goals for LTA and absenteeism. . In January 2019 for every 240,000 hours worked there were 33 work accidents and 220 days of disability</p>	<input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.	<p>All employees affiliated with EPS and ARL</p> <p>They have infirmary for first aid attention.</p> <p>LTA indicator: 2018 the goal of 4.5 was not achieved, it decreased compared to the previous 2 years.</p> <p>Indicator of absenteeism: Although it decreased, it did not raise the goal of 3.5.</p> <p>Report of conclusions and goals for LTA and absenteeism. . In January 2019 for every 240,000 hours worked there were 33 work accidents and 220 days of disability</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Criterion 4.8:			
All staff, workers, smallholders and contract workers are appropriately trained.			
4.8.1 (M)	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.	<p>Communicate corporate social responsibility policies in the induction of personnel, annual training plan, evidence of basic concepts and RSPO policies training (30/10/2017 and 21/02/2018 José Lizarazo, 30/11/2017 Edison Garcés, 2019 training plan includes RSPO policies and concepts 02/19/2019 and reintroduction to all staff November 2019).</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, , workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>In inductions to the entry of new personnel, incidents and accidents at work are included, hazard matrix.</p> <p>SGSST 2019-SG.</p> <p>Observation- In an interview conducted on 04/10/2019 with the Warehouse Assistant (Alvaro Jimenez), it was evidenced that he enters the main agrochemical warehouse carrying out activities of receipt of products and organization on the shelves. Confirmed with the Director of SST he has received internal training, but has only taken a class with SENA April 2018, of the 60 hour requirement.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> C w/Obs
4.8.2	Records of training for each employee shall be maintained.	<p>Reviewed:</p> <p>SGC-RE-DGH-72 Matriz identificación de peligros actualizada 01/12/2018, , workers are included in the identification of hazards (attendance control 26, 27, 28, 29 and 30/11/2018, responsable Silvia Silva SST).</p> <p>In inductions to the entry of new personnel, incidents and accidents at work are included, hazard matrix.</p> <p>Records of training are maintained.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity			
Criterion 5.1:			
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			

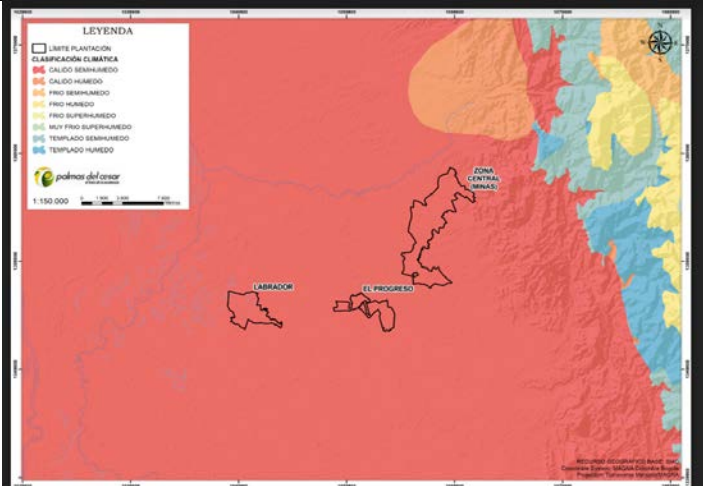
5.1.1 (M)	An environmental impact assessment (EIA) shall be documented.	Reviewed EISA updated in 2018 by BIOAP. Auditor reviewed Impact Matrix (Annex 49) that was built based on the participation of stakeholders including Communities, contractors, fruit suppliers and workers. The action plans have been implemented and the follow-up is scheduled for June 2019	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.	The evidence that there is a person responsible for executing the Management Plan can be found in document SGC-MN-SIG-07 v.2: PRINCIPLE 5. File1.1. page 270 Annex 5.2 Matrix for the Evaluation of Environmental Impacts. NC- The existence of a Management Plan was evidenced. In addition, confirmed during the environmental impact study updated by BIOAP in 2018 and in preliminary diagnosis by Palmas del Cesar. The plan's timeline began in 2016 and was valid until 2018. There is no evidence that the plan is being executed in 2019.	<input type="checkbox"/> C <input checked="" type="checkbox"/> NC <input type="checkbox"/> C w/Obs
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.	NC- The existence of a Management Plan was evidenced. In addition, confirmed during the environmental impact study updated by BIOAP in 2018 and in preliminary diagnosis by Palmas del Cesar. The plan's timeline began in 2016 and was valid until 2018. There is no evidence that the plan is being executed in 2019.	<input type="checkbox"/> C <input checked="" type="checkbox"/> NC <input type="checkbox"/> C w/Obs

Criterion 5.2:

The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.

5.2.1 (M)	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape- level considerations (such as wildlife corridors).	There is evidence of the existence of a HCV study conducted in 2016 and an update in 2018 in which the presence of species and the behavior of their populations during these years is documented. The action plans to guarantee the conservation of the species found are defined based on this study. The following maps were provided:	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
		<div>Geology</div>	

		Protected Areas		
		Prioridades de Conservación		
		Cuencas		

		Clima							
5.2.2 (M)	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.	Reviewed the following: Monitoreo AVC - DIC 18 Plan de accion zonas de amortiguamiento SGC-RE-SIG-53 Avistamiento de Especies_1 Review of documents and field verification confirm compliance with the indicator.	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.	Reviewed the following: Maps (see in 5.2.1) Monitoreo AVC - DIC 18 Plan de accion zonas de amortiguamiento SGC-RE-SIG-53 Avistamiento de Especies_1 Review of documents and field verification confirm compliance with the indicator.	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
5.2.4	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none">• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;• Outcomes of monitoring shall be fed back into the management plan.	Reviewed the following: Maps (see in 5.2.1) Monitoreo AVC - DIC 18 Plan de accion zonas de amortiguamiento SGC-RE-SIG-53 Avistamiento de Especies_1 Review of documents and field verification confirm compliance with the indicator.	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights.	Reviewed the following: Maps (see in 5.2.1) Monitoreo AVC - DIC 18 Plan de accion zonas de amortiguamiento SGC-RE-SIG-53 Avistamiento de Especies_1 Review of documents and field verification confirm compliance with the indicator.	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								
Criterion 5.3:									
Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.									
5.3.1 (M)	All waste products and sources of pollution shall be identified and documented.	SGC-MN-SIG-03v4 PLAN DE GESTION INTEGRAL DE RESIDUOS SOLIDOS page 21: Tabla 4: TIPIFICACIÓN DE RESIDUOS SOLIDOS ORDINARIOS, ORGNAICOS, RECICLABLES Y PELIGROSOS. Contains	<table><tr><td>X</td><td>C</td></tr><tr><td></td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>	X	C		NC		C w/Obs
X	C								
	NC								
	C w/Obs								

		three columns: Name of the waste or by-product /Kind/Generation Source GC-MN-SIG-03v4 PLAN DE GESTION INTEGRAL DE RESIDUOS SOLIDOS page 45: Cap 8.2. Tabla 13: Residuos Peligrosos generados en las diferentes áreas de Palmas del Cesar		
5.3.2 (M)	All chemicals and their containers shall be disposed of responsibly.	SGC-MN-SIG-03v4 PLAN DE GESTION INTEGRAL DE RESIDUOS SOLIDOS page 21: Tabla 4: TIPIFICACIÓN DE RESIDUOS SOLIDOS ORDINARIOS, ORGNAICOS, RECICLABLES Y PELIGROSOS. Contains three columns: Name of the waste or by-product /Kind/Generation Source GC-MN-SIG-03v4 PLAN DE GESTION INTEGRAL DE RESIDUOS SOLIDOS page 45: Cap 8.2. Tabla 13: Residuos Peligrosos generados en las diferentes áreas de Palmas del Cesar	<input checked="" type="checkbox"/>	C NC C w/Obs
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.	SGC-MN-SIG-03v4 PLAN DE GESTION INTEGRAL DE RESIDUOS SOLIDOS 83 p OBS- During the on-site assessment, auditors observed the appropriate disposal of waste and noted pollution sources are minimized. However, on a visit to a farm on April 10th, it was evidenced that waste was mixed, despite having protocols to identify wastes by names/colors. It was also noted that the space allocated for parking tractors/maintenance equipment showed traces of gasoline and fat on the ground.	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	C NC C w/Obs
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.				
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.	Reviewed: Plan de Mejora with Plant Manager, Carlos Fernandez. Verbal plan includes constant influx of projects varying in size and priority. Current energy operations include: Co-generation turbine using biomass- generates 40% of energy requirements for plantation and 70% of energy requirements in process. During 2018, Palmas del Cesar co-generated 49% of energy requirements. Diesel: Currently used ion transport and as a standby-in case of electricity down. During 2018, consumption of diesel .03 gallons per MT of FFB. New projects associated with improvement of energy requirements include: (1) Clean-tube technology used by the co-generator. (2) EFB press for line 2 of extraction mill. (3) FFB cage receipts Renewable energy use: around 40% or 5m kW or 34.6 kW/MT of FFB Direct fossil fuel use: .03 gallons per ton FFB Electricity in operation: total 8,717,950 kW total usage. Reviewed biogas feasibility studies with Mr. Fernandez, Plant Manager. Possibility for implementation in 2022.	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.				
5.5.1 (M)	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable	Reviewed SGC-DC-GER-11 V01 POLITICA DE RESPONSABILIDAD SOCIAL EMPRESARIAL p 2 By reviewing the document "Description of crop harvesting and maintenance activities" SGC-MN-DAG-01 as well as by interviews with	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

	guidelines in other regions.	field supervision personnel, it is evident that fire is not used as a method of land preparation for reseeded. Reviewed document: "ATENCIÓN DE SUELOS Y CULTIVOS SEMBRADOS EN TOPOGRAFÍAS CON PENDIENTES": reference is made to the Zero Burning Policy, but the company does not have a policy specifically defined for that purpose. However, they comply with all the requirements of good practices of zero burning. They must adjust the term or create the policy.		
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.	Reviewed SGC-DC-GER-11 V01 POLITICA DE RESPONSABILIDAD SOCIAL EMPRESARIAL p 2 By reviewing the document "Description of crop harvesting and maintenance activities" SGC-MN-DAG-01 as well as by interviews with field supervision personnel, it is evident that fire is not used as a method of land preparation for reseeded. Reviewed document: "ATENCIÓN DE SUELOS Y CULTIVOS SEMBRADOS EN TOPOGRAFÍAS CON PENDIENTES": reference is made to the Zero Burning Policy, but the company does not have a policy specifically defined for that purpose. However, they comply with all the requirements of good practices of zero burning. They must adjust the term or create the policy.	<input checked="" type="checkbox"/>	C NC C w/Obs
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.				
5.6.1 (M)	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).	Reviewed Boiler and Chimney emission analysis dated December 2018 conducted by IDEAM regulated entity, PyT Control. Mill operates 2 lines, thus operated 2 boilers with chimneys. Analysis of boiler 1: 168.7 mg/m3, boiler 2: 47.5 mg/m3. Both boilers comply with Colombian legislation of emissions	<input checked="" type="checkbox"/>	C NC C w/Obs
5.6.2 (M)	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.	Reviewed Boiler and Chimney emission analysis dated December 2018 conducted by IDEAM regulated entity, PyT Control. Mill operates 2 lines, thus operated 2 boilers with chimneys. Analysis of boiler 1: 168.7 mg/m3, boiler 2: 47.5 mg/m3. Both boilers comply with Colombian legislation of emissions	<input checked="" type="checkbox"/>	C NC C w/Obs
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.	Reviewed use of GHGPalm: INFORME FINAL PALM GH CALCULATOR PALMAS DEL CESAR 2017) 2018 in development by calculator update term to include the data until June	<input checked="" type="checkbox"/>	C NC C w/Obs
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.				
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.				
6.1.1 (M)	A social impact assessment (SIA) including records of meetings shall be documented.	Reviewed EISA 2016 by FRUTO SOCIAL DE LA PALMA and EISA updated in 2018 by BIOAP. Auditor reviewed Impact Matrix (Annex 49) that was built based on the participation of stakeholders. Reviewed meeting records dated: 21, 22, 23, 24/11/2018 for workers, contractors, fruit suppliers and community. Meeting dated 11/21/2018 included palm perception survey of Cesar communities. The action plans have been implemented and the follow-up is scheduled for June 2019	<input checked="" type="checkbox"/>	C NC C w/Obs
6.1.2 (M)	There shall be evidence that the	Evidence: Reviewed:	<input checked="" type="checkbox"/>	C NC

	assessment has been done with the participation of affected parties.	<p>Representatives of current Community Action Boards (JAC): (Minas President Claudia Estrada, Libano President Pablo Hernández, Vereda Caño Seco president Jose Villalba, Candelía, La Curva, Aguas Blancas y el Barro.</p> <p>Classification of interest groups according to risks and opportunities Group workers, union organization (53% of workers), fruit allies or fruit suppliers, suppliers of fruits and services, customers (Team Foods and Ecodiesel), shareholders, community (direct), hints, competition, authority and government agencies, trade associations, media.</p> <p>Extra hours: Resolution No. 027 of 2005 Ministerio de Protección Social.</p> <p>In 2017, benefit policies for the company's administrative workers were implemented (education in time, loan and educational aid, bearings, vacation policy was defined so that no more than two vacation periods were accumulated, which was generated in July 2017 and loan policy for family calamity). •</p> <p>The relationship with the communities is led by FUNDACION BAJO EL PALMAR</p> <p>Records reviewed included:</p> <p>Prior consultation: Ministerio de Interior issued certification No, 223 of 02/14/2014 where reference that there are no ethical communities in the area of influence.</p> <p>Annex 7 Map identifying the location of Indigenous communities (ICGAC APRIL 2014) more than 400 km away.</p> <p>SGC-RE-GER-15 VERSION 03 Comunicado interno: Internal work update 07/18/2018.</p>	<input type="checkbox"/>	C w/Obs
6.1.3 (M)	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.	<p>Reviewed EISA 2016 by FRUTO SOCIAL DE LA PALMA and EISA updated in 2018 by BIOAP.</p> <p>Action plan approved in October 2018 when they were validated with the community (follow-up in June / 2019), which contains a schedule with activity, responsible, date.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.	<p>Reviewed EISA 2016 by FRUTO SOCIAL DE LA PALMA and EISA updated in 2018 by BIOAP.</p> <p>Action plan approved in October 2018 when they were validated with the community (follow-up in June / 2019), which contains a schedule with activity, responsible, date.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).	Not applicable- not a smallholder scheme	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> X	C NC C w/Obs N/A
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.				
6.2.1 (M)	Consultation and communication procedures shall be documented.	<p>Reviewed</p> <p>SGC-RE GER-19 Registro PQRS: In 2018: 180 community, 8 Internal and 91 Web 91.</p> <p>SGC-RE-DHG-20 Registro control asistencia: 05/16/2016, 06/22/2016, 11/16/2017 Issues social responsibility, ethical code, PQRS, selection</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		<p>process, environmental policies, GIS areas, road safety, SST and community management. Participated Community Action Boards (JAC), educational entities, prosecutor, inspector Lebanon, attended 61 people.</p> <p>PQRS management supports: The Bajo el Palmar Foundation manages those of the community (owner Palmas del Cesar).</p> <p>SGC-RE-GER-20. Reviewed Request PQRS 01/29/2019 María Elena Gómez de Minas dump truck speed almost hit a child, the action taken 03/16/2019 was held the mooring operation and transportation of FFB and road safety regulations by of Logistics Eng. Fabio Santacruz (8 drivers). 03/28/2019 Minas community Mr. Jordan Camilo Sánchez, gave an economic support to knock down trees that threatened his house by fall, but the solution that verbally informs the Foundation's manager is not completely describe.</p>		
6.2.2	A management official responsible for these issues shall be nominated.	<p>Reviewed</p> <p>SGC-RE GER-19 Registro PQRS: In 2018: 180 community, 8 Internal and 91 Web 91.</p> <p>SGC-RE-DHG-20 Registro control asistencia: 05/16/2016, 06/22/2016, 11/16/2017 Issues social responsibility, ethical code, PQRS, selection process, environmental policies, GIS areas, road safety, SST and community management. Participated Community Action Boards (JAC), educational entities, prosecutor, inspector Lebanon, attended 61 people.</p> <p>PQRS management supports: The Bajo el Palmar Foundation manages those of the community (owner Palmas del Cesar).</p> <p>SGC-RE-GER-20. Reviewed Request PQRS 01/29/2019 María Elena Gómez de Minas dump truck speed almost hit a child, the action taken 03/16/2019 was held the mooring operation and transportation of FFB and road safety regulations by of Logistics Eng. Fabio Santacruz (8 drivers). 03/28/2019 Minas community Mr. Jordan Camilo Sánchez, gave an economic support to knock down trees that threatened his house by fall, but the solution that verbally informs the Foundation's manager is not completely describe.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.	<p>Classification of interest groups according to risks and opportunities Group workers, union organization (53% of workers), fruit allies or fruit suppliers, suppliers of products and services, customers (Team Foods and Ecodiesel), shareholders, community (direct), hints, competition, authority and government agencies, trade associations Each stakeholder group has contact, telephone, email (if applicable).</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.				
6.3.1 (M)	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.	<p>Reviewed</p> <p>SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS)), includes anonymity, responsible Human Management, includes suggestion boxes, COPASST, Labor Committee, Committee of coexistence.</p> <p>SGC-RE GER-19 Registro PQRS: In 2018: 180 community, 8 Internal and 91 Web.</p> <p>SGC-RE-DHG-20 Registro control asistencia: 05/16/2016, 06/22/2016, 11/16/2017 Issues social responsibility, ethical code, PQRS, selection process, environmental policies, GIS areas, road safety, SST and</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		<p>community management. Participated Community Action Boards (JAC), educational entities, prosecutor, inspector Lebanon, 61 participants attended.</p> <p>PQRS management supports: The Bajo el Palmar Foundation manages those of the community (owner Palmas del Cesar).</p> <p>SGC-RE-GER-20. Reviewed Request PQRS 01/29/2019 María Elena Gómez de Minas dump truck speed almost hit a child, the action taken 03/16/2019 was held the mooring operation and transportation of FFB and road safety regulations by of Logistics Eng. Fabio Santacruz (8 drivers). 03/28/2019 Minas community Mr. Jordan Camilo Sánchez, gave an economic support to knock down trees that threatened his house by fall, but the solution that verbally informs the Foundation's manager is not completely describe.</p>		
6.3.2 (M)	Documentation of both the process by which a dispute was resolved and the outcome shall be available.	<p>Reviewed</p> <p>SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS)), includes anonymity, responsible Human Management, includes suggestion boxes, COPASST, Labor Committee, Committee of coexistence.</p> <p>SGC-RE GER-19 Registro PQRS: In 2018: 180 community, 8 Internal and 91 Web.</p> <p>SGC-RE-DHG-20 Registro control asistencia: 05/16/2016, 06/22/2016, 11/16/2017 Issues social responsibility, ethical code, PQRS, selection process, environmental policies, GIS areas, road safety, SST and community management. Participated Community Action Boards (JAC), educational entities, prosecutor, inspector Lebanon, 61 participants attended.</p> <p>PQRS management supports: The Bajo el Palmar Foundation manages those of the community (owner Palmas del Cesar).</p> <p>SGC-RE-GER-20. Reviewed Request PQRS 01/29/2019 María Elena Gómez de Minas dump truck speed almost hit a child, the action taken 03/16/2019 was held the mooring operation and transportation of FFB and road safety regulations by of Logistics Eng. Fabio Santacruz (8 drivers). 03/28/2019 Minas community Mr. Jordan Camilo Sánchez, gave an economic support to knock down trees that threatened his house by fall, but the solution that verbally informs the Foundation's manager is not completely describe.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
<p>Criterion 6.4:</p> <p>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.</p>				
6.4.1 (M)	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.	<p>Reviewed:</p> <p>SGC-MN-DAF-04 Manual de Derechos Consuetudinarios – Manejo de Conflictos – Reparación y Compensación, versión 1. 03/14/2016: Land conflicts, land boundaries not recognized by the neighbors, claims of invasion and land spoils, land invasion and spoil, right of way, surface occupation contract with Colombian oil companies, conflicts in environmental, social, ethnic groups and with common crime, labor. It includes conflict resolution policies, respect for customary rights, to resolve processes that were not reconciled in the previous stage, to repair and compensate the affected party.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented,	<p>Reviewed SGC-MN-DAF-04 Manual de Derechos Consuetudinarios – Manejo de Conflictos – Reparación y Compensación, versión 1. 03/14/2016.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	<p>C</p> <p>NC</p> <p>C w/Obs</p>

	monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.	Records reviewed include: Invasion 12/07/2018, resolution 0171 07/03/2019 resolves appeal administrative action of removal of the invader 03/07/2019.		
6.4.3 (M)	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.	<p>Reviewed:</p> <p>SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS)), includes anonymity, responsible Human Management, have suggestion boxes, COPASST, Labor Committee, Committee of coexistence.</p> <p>SGC-RE GER-19 Registro PQRS: In 2018: 180 community, 8 Internal and 91 Web 91.</p> <p>SGC-RE-DHG-20 Registro control asistencia: 05/16/2016, 06/22/2016, 11/16/2017 Issues social responsibility, ethical code, PQRS, selection process, environmental policies, GIS areas, road safety, SST and community management. Participated Community Action Boards (JAC), educational entities, prosecutor, inspector Lebanon, attended 61 people.</p> <p>PQRS management supports: The Bajo el Palmar Foundation manages those of the community (owner Palmas del Cesar).</p> <p>SGC-PR-GER-06 Procedure requests, complaints, acknowledgments and suggestions (PQRS), includes anonymity, responsible Human Management, have 53% of workers are unionized, so the compensations agreed in the collective agreement of 2015 covers all workers.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.				
6.5.1 (M)	Documentation of pay and conditions shall be available.	<p>They have direct contracts for field work in oil palm cultivation and in the extraction plant, some on a fixed term and others indefinite.</p> <p>Minimum salary in Palmas del Cesar is 39% higher than SMMLV of Colombia, agreement in collective agreement with union.</p> <p>Pay the payroll every 14 days and give them the detail of the day-to-day payments which they sign when they deliver the check.</p> <p>Records:</p> <p>Period from 03/25/2019 to 04/07/2019: Prospero Gutierrez - net harvest \$ 675,145, Jaime Gómez - net harvest \$ 667,733, Luis Eduardo Alzate net \$ 966,610, Juan Andres Wallis net \$ 765,060.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
6.5.2 (M)	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained	<p>Payroll support clear and detailed workers payments: Basic salary, overtime, Sunday or holiday compensated, layoffs and deductions.</p> <p>The minimum wage is 39% higher than the SMLMV.</p> <p>Records signed as received by the worker: February and March 2019, Francisco Badillo, Edison Garcés, Alvaro Jiménez, Jose Lizarazo,, Oscar Lopez.</p> <p>Reviewed SGC-RE-DAF-67 Hoja de control de documentos. Each in each folder of the includes the worker's resume, the and work</p>	<input type="checkbox"/> <input checked="" type="checkbox"/> X <input type="checkbox"/>	C NC C w/Obs

	carefully to them by a management official.	<p>contracts. Records signed as received by the worker: February and March 2019 contracts verified for Francisco Badillo, Edison Garcés , Alvaro Jiménez, Jose Lizarazo,, Oscar Lopez.</p> <p>of the persons listed above were verified, all contracts ended indefinitely and signed by the employer and worker.</p> <p>Not complaints found from the workers for breach of contract clauses or unjust in just labor conditions.</p> <p>They have a workers have a union, the last collective agreement was in 2015. An updated collective agreement is planned for May 2019. , in May 2019, a new collective.</p> <p>Payroll supports clear and detailed workers payments: Basic salary, overtime, Sunday or holiday compensated, layoffs and deductions. The minimum wage is 39% higher than the SMLMV.</p> <p>NC- Through worker interviews identified evidence of a worker who had exceeded the maximum allowable work hours, as established in Colombia regulations.</p>		
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.	<p>The administrative staff has the possibility of staying in plantation, in adequate houses with electricity, water, permanently have two ambulances, no children inside the facilities of the company.</p> <p>Excellent conditions of housing, order and cleanliness were evidenced.</p> <p>They have benefits such as: Payment by the worker of only 34% of the value of food, have a contract with the company Petrocasinos since 06/01/2018, loan for vehicle purchase, housing leasing.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.	<p>The administrative staff has the possibility of staying in plantation, in adequate houses with electricity, water, permanently have two ambulances, no children inside the facilities of the company.</p> <p>Excellent conditions of housing, order and cleanliness were evidenced.</p> <p>They have benefits such as: Payment by the worker of only 34% of the value of food, have a contract with the company Petrocasinos since 06/01/2018, loan for vehicle purchase, housing leasing.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 6.6: The employer 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.				
6.6.1 (M)	A published statement in local languages recognising freedom of association shall be available.	<p>Reglamento Interno de trabajo(ley 1010)</p> <ul style="list-style-type: none"> - Artículo 49 num 4: Prohibición por parte de palmas - Artículo 50 Num 7: Prohibiciones de los trabajadores - Artículo 28: Permisos <p>There is an interview with three union representatives, confirming their right to free association and the company's respect for the agreements made in the collective agreement of 2015.</p> <p>Evidence: RSPO interview attendance list</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented.	<p>It is evidenced the minutes of meetings of the labor committee, made up of three representatives of the union and three representatives of the division.</p> <p>Last meeting: 11.04.2019</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 6.7: Children are not employed or exploited.				
6.7.1 (M)	There shall be documentary evidence	Reviewed	<input checked="" type="checkbox"/> X <input type="checkbox"/>	C NC

	that minimum age requirements are met.	SGC-DC-GER-11 Política de responsabilidad social empresarial Versión 1 That says "Our work is performed by people over 18 years of age". It is published in billboards of administrative offices, in the administrative offices of the plantations, web page http://palcesar.com/nosotros/#politicas Revised resumes and interviews with workers, all over 18 years old.	<input type="checkbox"/>	C w/Obs
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.				
6.8.1 (M)	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented	Reviewed: SGC-DC-GER-11 Política de responsabilidad social empresarial Versión 11 I 04/094/2014 that says "People may be linked to the Plantation, without any discrimination based on race, caste, nationality, religion, disability, gender or political affiliations. . They will enjoy the same opportunities to which other workers have access. It is published in billboards of administrative offices, in the administrative offices of the plantations, and on the corporate web page http://palcesar.com/nosotros/#politicas .	<input checked="" type="checkbox"/>	C NC C w/Obs
6.8.2 (M)	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.	Reviewed SGC-MN-GER-09 Código de ética y buen gobierno V2, Induction of new workers Presentation social responsibility, includes all policies "The conduct of work-related harassment, sexual harassment and / or violence are typified by the internal work regulations as serious faults and rigorous procedures will be applied", "We support the education of our youth in the region.", "We train and certify our workers in labor competencies.", "People can be linked to the Plantation, without any discrimination based on race, caste, nationality, religion, disability, gender or political affiliation. They will enjoy the same opportunities to which other workers have access. "We treat our employees with fairness and respect, guaranteeing decent and decent work. Published on the billboards of the company, on the website, attendance control 10/30/2017 143 workers talked about the COPASST and Coexistence Committee. SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS), includes anonymity, responsible Human Management, have suggestion boxes, COPASST, Labor Committee, Committee of coexistence GC-PR-DGH-3. Procedimiento de selección, contratación y desvinculación de personal, version 9. They have profiles and descriptions of positions with which they make the selection of personnel and promotions Annual training plan Records 08/23/2018 Luz Dary Garcia records, internal work regulations, solid and hazardous waste integral management, corporate social responsibility policies, first aid and communications plan, basic concept P & C RSPO 01/09/2019, 01/10/2019, 02/11/2019 William Torres Golden rules for maintenance work, internal regulations of, Corporate social responsibility policies and work communications plan, basic concepts P & C RSPO., induction into office	<input checked="" type="checkbox"/>	C NC C w/Obs
6.8.3	It shall be demonstrated that recruitment selection, hiring and	Reviewed	<input checked="" type="checkbox"/>	C NC

	promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.	<p>SGC-MN-GER-09 Código de ética y buen gobierno V2, Induction of new workers Presentation social responsibility, includes all policies "The conduct of work-related harassment, sexual harassment and / or violence are typified by the internal work regulations as serious faults and rigorous procedures will be applied", "We support the education of our youth in the region.", "We train and certify our workers in labor competencies.", "People can be linked to the Plantation, without any discrimination based on race, caste, nationality, religion, disability, gender or political affiliation. They will enjoy the same opportunities to which other workers have access. "We treat our employees with fairness and respect, guaranteeing decent and decent work.</p> <p>Published on the billboards of the company, on the website, attendance control 10/30/2017 143 workers talked about the COPASST and Coexistence Committee.</p> <p>SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS), includes anonymity, responsible Human Management, have suggestion boxes, COPASST, Labor Committee, Committee of coexistence</p> <p>GC-PR-DGH-3. Procedimiento de selección, contratación y desvinculación de personal, version 9.</p> <p>They have profiles and descriptions of positions with which they make the selection of personnel and promotions</p> <p>Annual training plan</p> <p>Records 08/23/2018 Luz Dary Garcia records, internal work regulations, solid and hazardous waste integral management, corporate social responsibility policies, first aid and communications plan, basic concept P & C RSPO</p> <p>01/09/2019, 01/10/2019, 02/11/2019 William Torres Golden rules for maintenance work, internal regulations of, Corporate social responsibility policies and work communications plan, basic concepts P & C RSPO., induction into office</p>	<input type="checkbox"/>	C w/Obs
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.				
6.9.1 (M)	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.	<p>Reviewed</p> <p>SGC-DC-GER-11 Política de responsabilidad social empresarial Version 01 del 04/09/2014 that says "The conduct of workplace harassment, sexual harassment and / or violence are typified by the internal work regulations as serious faults and will be applied to the procedures of rigor " We respect the reproductive rights of all, especially of women "</p> <p>It is published in billboards of administrative offices, in the administrative offices of the plantations, and on the corporate web page http://palcesar.com/nosotros/#politicas</p> <p>Communicate corporate social responsibility policies in the induction of personnel, annual training plan, evidence of basic concepts and RSPO policies training (30/10/2017 and 21/02/2018 José Lizarazo, 30/11/2017 Edison Garcés. 2019 training plan includes RSPO policies and concepts 02/19/2019 and reintroduction to all staff planned for November 2019.</p> <p>SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS), includes anonymity and refers to the topics to be discussed in each committee.</p> <p>The internal work regulations include penalties for non-compliance with</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		corporate social responsibility policies. They do not have a gender committee.		
6.9.2 (M)	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.	<p>Reviewed</p> <p>SGC-DC-GER-11 Política de responsabilidad social empresarial Version 01 del 04/09/2014 that says "The conduct of workplace harassment, sexual harassment and / or violence are typified by the internal work regulations as serious faults and will be applied to the procedures of rigor " We respect the reproductive rights of all, especially of women ."</p> <p>It is published in billboards of administrative offices, in the administrative offices of the plantations, and on the corporate web page http://palcesar.com/nosotros/#politicas</p> <p>Communicate corporate social responsibility policies in the induction of personnel, annual training plan, evidence of basic concepts and RSPO policies training (30/10/2017 and 21/02/2018 José Lizarazo, 30/11/2017 Edison Garcés. 2019 training plan includes RSPO policies and concepts 02/19/2019 and reintroduction to all staff planned for November 2019.</p> <p>SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS), includes anonymity and refers to the topics to be discussed in each committee.</p> <p>The internal work regulations include penalties for non-compliance with corporate social responsibility policies. They do not have a gender committee.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.	<p>Reviewed</p> <p>SGC-PR-GER-06 Procedimiento peticiones, quejas, reconocimientos y sugerencias (PQRS), includes anonymity, responsible Human Management, have suggestion boxes, COPASST, Labor Committee, Committee of coexistence</p> <p>SGC-RE-GER-19 PQRS Registry: In 2018: 180 community, 8 Internal and 91 Web 91.</p> <p>Outreach supports: Folder of meetings with the communities: 06/22/2016 first socialization PQRS community Minas have record of attendance in minutes of meeting participo president of community action board, 05/16/2016 community Libano16 / 11/2017 SGC -RE-DHG-20 Registration control assistance, social responsibility, ethical code, PQRS, selection process, environmental policies, GIS areas, road safety, SST and community management. Participated Community Action Boards (JAC), educational entities, prosecutor, inspector Lebanon, attended by 61 people.</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.				
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.	<p>Reviewed contracted titled, Convenio de Colaboración Comercial. Contract is signed between third party FFB providers and Palmas del Cesar. Contract stipulates FFB price, as 17% of previous month Rotterdam price average. No middle men evidenced. All third party FFB providers must sign a contract prior to be allowed to send FFB to the mill. Contract is given to each FFB provider with plenty of time for review. All contracts must be signed at Central Office Bucaramanga.</p> <p>Reviewed contract, EFB not contractually available to third party providers. Available only as an exception. Contractual services include: FFB pricing, pay periods, free Technical assistance, various loans</p>	<input checked="" type="checkbox"/> X <input type="checkbox"/> <input type="checkbox"/>	C NC C w/Obs

		(seedlings), contract validity, 5, 10 or 15 years. Contract does not provide for tools, fertilizers and/or pest management products.	
		Reviewed third party complaint list, located in HR department, no FFB pricing complaints evidenced. Further verified during interview with Andrea in HR.	
6.10.2 (M)	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).	<p>Reviewed contracted titled, Convenio de Colaboración Comercial. Contract is signed between third party FFB providers and Palmas del Cesar. Contract stipulates FFB price, as 17% of previous month Rotterdam price average. No middle men evidenced. All third party FFB providers must sign a contract prior to be allowed to send FFB to the mill. Contract is given to each FFB provider with plenty of time for review. All contracts must be signed at Central Office Bucaramanga.</p> <p>Reviewed contract, EFB not contractually available to third party providers. Available only as an exception. Contractual services include: FFB pricing, pay periods, free Technical assistance, various loans (seedlings), contract validity, 5, 10 or 15 years. Contract does not provide for tools, fertilizers and/or pest management products.</p> <p>Reviewed third party complaint list, located in HR department, no FFB pricing complaints evidenced. Further verified during interview with Andrea in HR.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.	<p>Reviewed contracted titled, Convenio de Colaboración Comercial. Contract is signed between third party FFB providers and Palmas del Cesar. Reviewed contract between Palmas del Cesar and Argopecuaria Londono Contreras y Cia, signed 01 July 2009.</p> <p>Folder includes:</p> <ol style="list-style-type: none"> 1. Intention letter date 21 May 2008. 2. Land title # 196-4575. 3. Seedling contract. Further reviewed during interview with Efrain Londoño Londoño. During interview Mr. Londoño expresses total understanding and satisfaction with contract. In addition, verifies agreed timeline of 15 years. Actual contracts physically kept at Central Office, Bucaramanga. 	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
6.10.4	Agreed payments shall be made in a timely manner.	Reviewed contract titled, Convenio de Colaboracion Comercial. Contract is signed between third party FFB providers and Palmas del Cesar. Contract stipulates twice a month payments. Verified during interview with Efrain Londono.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Criterion 6.11:			
Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.	<p>Reviewed SGC-RE-DGH-20 Control de asistencia versión 6</p> <p>Records reviewed:</p> <p>04/11/2019 meeting with the community (Carlos Salazar, Jose Contreras, Miguel Suarez and Muñoz de Corregimiento los Bagres, Dora Riaño and Millerlandy Riaño de Caño Seco and José Rincón Candelia). The interviewees report that they have participated with the company in the identification of needs and expectations and that through the FUNDACION BAJO EL PALMAR . Projects have been developed (improvement in routes in the veredas and corregimientos, emergency attention, decrease in use of agrochemicals, wildlife protection and training of HCV, aid for sports, improvement of schools,</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs

		<p>delivery of school kits, new housing project).</p> <p>Stakeholders recognize fair work that they are productive in cultivation and feel that there is a mutual benefit, fluid and direct relationship with the company, they give training to the staff and to the communities in fauna, PQRS, code of ethics).</p> <p>Internally the workers have the program of support to the community contributing \$ 8,000 biweekly and the company also makes the same contribution.</p>																									
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.	<p>Reviewed Service Provider Unit (USP), which serves all suppliers of palm oil fruit.</p> <p>The table below describes the main strategy (It was obtained through interviews, documentary review)</p> <p>USP MANAGEMENT TOWARDS THE INTEGRAL PRODUCTIVITY OF FFB SUPPLIERS</p> <table><tr><th>ACTION</th><th>DETAILS</th><th>DOCUMENTS</th></tr><tr><td>Permanent and personalized agronomic accompaniment</td><td>A visit and technical accompaniment is made with an average frequency of 45 days. Each supplier is assigned an agronomist who leads the suggested recommendations to improve the conditions and productivity of the crop; together with the assignment of a technical assistant who supports the agronomist in the follow-up and accompaniment to the fruit supplier.</td><td>Record of visits Verification of recommendations</td></tr><tr><td>Accompaniment and advice health management of the crop</td><td>Disease census service is provided to those providers that do not have the personnel to perform the work (activity programmed monthly by the assigned coordinator). For the provider that has the staff that meets the parameters of training, experience and employment link is trained without cost your staff. What is sought with this work is to ensure periodic health inspections and inspections of the crop and, if required, to guide the supplier in controls or management on findings found in a timely and appropriate manner. Thus ensuring the minimum conditions to achieve good productions.</td><td>Phytosanitary Census Programming phytosanitary censuses Communicated to RFF suppliers</td></tr><tr><td>Protocol compliance protocol of "Pudrición del Cogollo" (pc)</td><td>A punctual follow-up is carried out on PC management and control, given that it is the disease with the highest incidence in the area. The provider is taught and follows up on the proper handling of this disturbance so that every 3 months the compliance of said indicators is audited, in order to guarantee the health of the crop and, consequently, the productivity thereof.</td><td>Verification of PC management protocol</td></tr><tr><td>Training plan for suppliers</td><td>Seminars and training cycles are organized for topics of general interest: Health, Nutrition, Productivity, Banking and others; all oriented to the sustainable and productive management of the crop. Training is directed according to the approach to the property owner, the administrator or operators</td><td>Control assistance to RFF supplier trainings Evaluation of training</td></tr><tr><td>Financing of supplies and supplies</td><td>The supplier is given the option of purchasing their semi-annual fertilizers and tools through the company; in order to be able to guarantee the nutrition of the crop in the case of suppliers that do not have an immediate and sufficient budget for this work. These</td><td>Business collaboration contract Emails with orders and payment agreements</td></tr></table>	ACTION	DETAILS	DOCUMENTS	Permanent and personalized agronomic accompaniment	A visit and technical accompaniment is made with an average frequency of 45 days. 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X	C																										
	NC																										
	C w/Obs																										

		<p>purchases are discounted according to mutual agreement of the fruit that enter between the parties</p> <p>Banking There is an agreement in Davivienda so that the suppliers that require it access credit lines that favor the fulfillment of work on the premises (fertilization, maintenance, purchase of machinery, etc.) or growth of planted area. NAN</p>	
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1 (M)	There shall be evidence that no forms of forced or trafficked labour are used.	Reviewed SGC-DC-GER-11 Política de responsabilidad social empresarial Versión that states "Any type of forced labor or trafficking is prohibited and under no circumstances will practices or activities that threaten physical integrity be permitted. of the worker. GC-PR-DGH-3. Procedimiento de selección, contratación y desvinculación de personal, version 9.	<input checked="" type="checkbox"/> X C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred.	No substitution of contracts was evidenced.	<input checked="" type="checkbox"/> X C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
6.12.3 (M)	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.	REVIEWED They apply for recruitment of migrants what the chancellery specifies. Document Reviewed: PROCEDIMIENTO DE CONTRATACIÓN DE PERSONAL: SGC-PR-DGH-03 3.LINKING MIGRANT EMPLOYEES The company is not linked to the qualified or unskilled work product of clandestine or illegal migrations, respecting in all cases the human rights of these individuals. Any foreign citizen who establishes an employment relationship in Colombia refers to the provisions of the Labor Code that regulates the rules of the individual labor law in particular and the collective labor law, both official and private. In all the territory of the Republic. The following documentation must be requested to hire, employ or admit a foreigner: Visa that allows you to develop the activity, occupation or trade authorized in it. Alien Registration Card when it is required to process it (Visa valid for more than three (3) months). Written Report on Migration Colombia on the relationship or hiring and its termination or termination of the contract, within fifteen (15) calendar days following the initiation or termination of work. Foreign worker Contract To cover expenses of return to the country of origin or residence, as well as to his family or beneficiaries upon termination of the contract, or when it proceeds to the cancellation of the visa, deportation or expulsion.	<input checked="" type="checkbox"/> X C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Criterion 6.13: Growers and millers respect human rights.			
6.13.1 (M)	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).	Reviewed SGC-DC-GER-11 Política de responsabilidad social empresarial Version 01 del 04/09/2014 that says "International human rights are respected, as is the right of communities".	<input checked="" type="checkbox"/> X C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs

		<p>It is published in billboards of administrative offices, in the administrative offices of the plantations, and on the corporate web page http://palcesar.com/nosotros/#politicas</p> <p>Communicate corporate social responsibility policies in the induction of personnel, annual training plan, evidence of basic concepts and RSPO policies training</p> <p>Records: (30/10/2017 and 21/02/2018 José Lizarazo, 30/11/2017 Edison Garcés, training plan 2019 includes policies and concepts RSPO 02/19/2019 and reinduction to all staff planned for November 2019), 12/19/2018 laundry contractor Andrea Carvajal, 10/09/2018 Servired fertilizer loading and unloading company by band (Jeremías Guillen, Orlani Duran, José Luis Balun, Alirio Rincon).</p> <p>There were no reported cases of human rights violations.</p>							
Principle 7: Responsible development of new plantings									
<input checked="" type="checkbox"/> Certification Unit and supply base did not carry out any new plantings since November 2005. Principle 7 does not apply.									
<input checked="" type="checkbox"/> The immature areas are replanted areas (if immature areas exist).									
Principle 8: Commitment to continual improvement in key areas of activity									
Criterion 8.1:									
Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.									
8.1.1 (M)	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none">• Reduction in use of pesticides (Criterion 4.6);• Environmental impacts (Criteria 4.3, 5.1 and 5.2);• Waste reduction (Criterion 5.3);• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);• Social impacts (Criterion 6.1);• Optimising the yield of the supply base.	<p>It was not evident that the impact indicators of the environmental area were up to date, which does not provide verification that the Continuous Improvement Plans are being implemented.</p>	<table><tr><td></td><td>C</td></tr><tr><td>X</td><td>NC</td></tr><tr><td></td><td>C w/Obs</td></tr></table>		C	X	NC		C w/Obs
	C								
X	NC								
	C w/Obs								

Appendix 5: Supply Chain of the Mill Checklist

Module D- CPO Mills: Identity Preserved <input checked="" type="checkbox"/> N/A, not implementing IP model (skip section)	
<p>D.1.1- A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p> <p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	
D.3. Documented Procedures D.3.1 - The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: Complete and up to date procedures covering the implementation of all the elements in these requirements; The name of the person having 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 site procedures for the implementation of this standard.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
D.3.2- The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Section D.3 Evidence:	
D.4 Purchasing and Goods In D.4.1- The site shall verify and document the volumes of certified and non-certified FFBs received. D.4.2- The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Section D.4 Evidence :	
D.5 Record Keeping D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
D.6 Processing D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage. D.6.2 The objective is for 100 % segregated material to be reached.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Sections D.5-2.6 Evidence:	

Module E- CPO Mills- Mass Balance		<input type="checkbox"/> N/A, not implementing MB model (skip section)
<p>E.1.1- Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>E.2.1- The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p> <p>E.2.2- The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>		
E.3. Documented Procedures E.3.1 - The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: Complete and up to date procedures covering the implementation of all the elements in these requirements; The name of the person having 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 site procedures for the implementation of this standard.		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
E.3.2- The site shall have documented procedures for receiving and processing certified and non-certified FFBs.		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Section D.3 Evidence: SGC-PR-DPB-24, titled, Sistema de Cadena de Custodia. Version 8. SGC-PR-DPB-35, titled- Ingreso de Productos Certificados RSPO a la Plataforma Palm Trace. SGC-MN-SIG-07 v.01, titled- Principio 5. RSPO. Reviewed SGC-PR-DPB-24, titled, Sistema de Cadena de Custodia. Version 8. According to procedures the person with the overall responsibility for the implementation of RSPO-SC requirements is Production Lead. At time of audit position held by Jorge Mantilla. Others in the RSPO implementation team include, Coordinadora de Ventas, Coordinador de Procesos Transversales. Positions currently held by Claudia Ocampo and Viviana Dueñas		
E.4 Purchasing and Goods In E.4.1- The site shall verify and document the volumes of certified and non-certified FFBs received. E.4.2- The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
Section E.4 Evidence : Verified SGC-PR-DPB-33, titled: Informe de Producción. Reviewed SGC-PR-DPB-24, titled, Sistema de Cadena de Custodia, page 9. At time of audit all FFB received is corporate owned. No smallholders or groups are currently included in FBB scope. Procedure describes 3 critical control points. <p>(1) FFB reception: At weighbridge, operator inputs into ERP BIOSALC, the amount of FFGB received in the case of proprietary farms, FFB is identified in ERP as RSPO-MB certified- referenced in SGC-RE-DPB-05. All others are inputted as conventional, reference SGC-RE-DPB-06.</p> <p>(2) Physical storage of RSPO-MB CPO: Daily production volumes are calculated and daily inputted into SGC-RE-DPB-89.</p> <p>(3) Dispatch of RSPO-MB CPO: Certification of CPO is determined my amount of certified FFB received. All outgoing materials is tracked by SGC-RE-DPB-31, clearly stating: RSPO-MB.</p> <p>Reviewed production records for audit year 2018 (January 1, 2018 to December 31, 2018): Total FFB processed of 251,692 MT, of that RSPO-MB is 73,479 MT CSPO produced 38,078 conventional and 12,881 RSPO-MB. CSPK produced 8,100 conventional and 3,335 RSPO-MB Reviewed monthly mass balance report of certified and non-certified production (SGC-RE-DPB-91). Further verified during interview with Jorge Mantilla</p>		

<p>E.5 Record Keeping</p> <p>E.5.1</p> <ul style="list-style-type: none"> a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short. (ie product can be sold before it is in stock.) <p>For further details refer to Module C.</p>	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs
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<p>E.5.2 In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.</p>	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs
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<p>Section E.5 Evidence:</p> <p>Reviewed SGC-PR-DPB-24, titled, Sistema de Cadena de Custodia. Version 8. According to procedures -page 16-, all records are kept for a minimum of 2 years. Palmas del Cesar will be using a fixed accounting system. Palmas del Cesar utilizes 2 systems:</p> <p>Reviewed software: Sistema Integrado de Gestión. Accessible to quality and administrative personnel. Database holds: Procedure, Manuals, formats and templates. Evidences of specific records are kept with “Lider Production Palma”, at time of audit, responsible person for SCC implementation program (Jorge Mantilla). Direccion Planta de Beneficio, Direccion Agronomica, DGH- Direccion de Gestio Humana, USP Unidad de Servicio al proceedor, DAF-Direccion administrativo y Fanciera, SIG, RSPO, Calidad y Ambiental. Reviewed List of Procedures. RSOP integrated within each area ERP system is called BIOSALC. ERP used for PO management, raw material receipt, invoicing, traceability and dispatch of finished goods. Reviewed records in ERP system, records confirm the certified status of materials throughout the supply chain. Process starts certified and non-certified FFB, and invoicing to customers. In addition, Biosalc used by weight bridge, FFB received, Mass Balance, production reports. ERP Enterprise used for invoicing, A/P, Sales orders.</p> <p>Reviewed Database: Seguimiento SCC RSPO-MB PALCESAR. Database includes all traceability required information: FFB received (MB and conventional), extraction rates, CPO produced (MB and conventional), PK received (RSPO and conventional), PKO produced (RSPO and conventional).</p> <p>Reviewed Mass balance stock, no negative balance recorded during audit period.</p> <p>Review if records and procedures confirms compliance.</p>							
<p>Claims</p>							
<p>5.11.1 The organization has only made claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p> <p><i>Note: For most clients, the MCC checklist will be applicable. However, if the organization does not currently or does not intend to over the next year make any RSPO claims, engage in any RSPO-related market communications, and/or use the RSPO logo or other trademarks on products or promotionally, then the MCC checklist is not applicable.</i></p>	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C, see MCC CHK</td></tr> <tr><td><input type="checkbox"/></td><td>NC, see MCC CHK</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, not making claims</td></tr> </table>	<input checked="" type="checkbox"/>	C, see MCC CHK	<input type="checkbox"/>	NC, see MCC CHK	<input type="checkbox"/>	N/A, not making claims
<input checked="" type="checkbox"/>	C, see MCC CHK						
<input type="checkbox"/>	NC, see MCC CHK						
<input type="checkbox"/>	N/A, not making claims						
<p>Section 5.11.1 Evidence: Trademark License: 1-0161-16-100-00 expiration date 01/11/2019. Business-to-business communication: Module specific claims and P&C and SCC claims made in the form of remission tickets and invoices. General corporate communication in the form of trademark use, in digital format on the website: www.palcesar.com.</p>							