Particulars

About Your Organisation

1.1 Member Name Continental Confectionery Company Gda Sanayi Ve Ticaret Anonim irketi 1.2 Membership number 4-0361-13-000-00 1.3 Membership sector **Consumer Goods Manufacturers** 1.4 Membership category Ordinary 1.5 Country Turkey 2.0 Does your company or organisation produce, process, consume or sell any palm oil or any products containing derivatives of palm oil? Yes 2.1 Please select all description(s) that describe the palm oil-related activities of your company or organisation. Multiple selections are allowed, and not limited to the primary sector of the member's RSPO membership. You will be required to complete the relevant ACOP section based on your selection(s). I own and operate oil palm estate(s) and/or palm oil mill(s) ☐ I represent a palm oil Independent Smallholder farmer Group I own and operate independent palm oil mills ☐ I own and operate independent palm kernel crushing plants ☐ I trade or broker palm oil, palm kernel oil or related products I am a refiner of palm oil or palm kernel oil I am a processor of intermediate (B2B) palm oil, palm kenel oil or related ingredients I am a B2B distributor or wholesaler of palm oil, palm kernel oil or related products I manufacture consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by 3rd party contractors. I retail consumer (B2C) products containing palm oil, palm kernel oil or related products I operate food retail outlets that use palm oil, palm kernel oil or related products I support the sustainable development of the palm oil industry as a conservation and environmental NGO I support the sustainable development of the palm oil industry as a social and human development NGO

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Consumer Goods Manufacturers

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1.1 Please state your company's main activity within the palm oil supply chain.
▼ Food Good Manufacturer - own brand
▼ Food Good Manufacturer - third-party brand
☐ Home & Personal Care Good Manufacturer - own brand
☐ Home & Personal Care Good Manufacturer - third-party brand
☐ Ingredient Manufacturers
☐ Biofuels
• Other
Other
Manufacturer of chewing gum (including compressed gum) and candy

2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the RSPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.

reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.
2.1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are owned and/or managed by the member, including those under Group Membership
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?
Europe, North America, China,Africa, Rest of the World
DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:
an aggregate level (as in previous ACOP reporting cycles)

2.2 Total volume of uncertified and certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products

Description	Tonnes
Total volume of crude palm oil (tonnes)	18.0
Total volume of crude palm kernel oil (tonnes)	292.0
Total volume of palm kernel expeller (tonnes)	0.0
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	168.0
Total	478.0

2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question CG.2.2) derived from palm oil or from palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based derivatives.

Description	Percentage
Palm oil-based derivatives and fractions	95.0
Palm kernel oil-based derivatives and fractions	5.0

2.3 Please estimate the regional distribution of your company's uncertified and certified palm oil, palm kernel oil and related products sales (as declared in Question 2.2) in the following countries/regions. In cases where sales distribution data is not available, members may use manufacturing regions as a proxy for regional usage of certified volumes.

Countries/Regions	Percentage
Europe	30.0
North America	27.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	0.0
Rest of World	43.0

2.4 Volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products in the year:

Description	Crude/Refined Palm Oil (CSPO)	Crude/Refined Palm Kernel Oil (CSPKO)	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions	
RSPO Credits from Mill / Crusher	0.0	0.0	0.0		
RSPO Credits from Independent Smallholder	0.0	0.0	0.0	0.0	
Mass Balance (MB)	0.54	0.61	0.0	19.19	
Segregated (SG)	7.45	17.47	0.0	145.29	
Identity Preserved (IP)	0.0	0.0	0.0	0.0	
Total	7.99	18.08	0.0	164.48	

2.4.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question CG.2.4) derived from RSPO-certified palm oil or from RSPO-certified palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based

Description	Percentage
Certified Palm oil-based derivatives and fractions	97.0
Certified Palm kernel oil-based derivatives and fractions	3.0

2.5 According to the volume information you have provided in Question 2.2 and Question 2.4, your company's certified palm oil and palm oil products uptake is:

39.86%

2.5.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake. This may include your usage of RSPO Credits to cover gaps in certified uptake, changes due to business environment, variations due to stock positions or efforts to support independent smallholders beyond volume commitments.

2.6 Please estimate the regional distribution of your company's RSPO certified palm oil and palm oil-products usage (as declared in Question CG.2.3) in the following countries/regions:

Countries/Regions	Percentage
Europe	66.0
North America	1.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	0.0
Rest of World	33.0

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3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?
2014
3.2 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products
2015
3.2.1 If the previous target year has not been met, please explain why.
3.3 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from any supply chain option in own-brand products.
2025
3.3.1 If the previous target year has not been met, please explain why.
Our aim will be to supply SG certificated raw materials and to ensure the transition of the MB RSPO certificated PO, PKO sources in our products to upgrade level on supply chain. And we began to supply most of our raw materials as RSPO SG certified. But it should be noted that, possibility of using SG RSPO certificated PO fractions and PKO fractions still seems very difficult as commercial, it may therefore not to focus on this products within the specified timing. So, target date will be 2023 for PL products and our branded products will follow it afterwards. Our goal is to end the transition process by 2025 at the latest.
3.4 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.
2025
3.4.1 If the previous target year has not been met, please explain why.
Our aim was to complate 100% RSPO-certified sustainable palm oil and oil palm products from physical supply chains at 2022. However, we will not met the target date due to the fact that there was lack of commercial alternative rawmaterials. So, target date will be 2023 for PL products and our branded products will follow it afterwards. Our goal is to end the transition process by 2025 at the latest.
3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why

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products manufactured on behalf of other companies?
Yes
3.6.1 Does your company have a TimeBound Plan to only use RSPO-certified sustainable palm oil and palm oil products in the goods you manufacture on behalf of other companies?
Yes
3.6.2 When do you expect all products manufactured on behalf of other companies to only contain RSPO-certified sustainable palm oil and palm oil products?
2025

3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in

4. Trademark Use

4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?
Yes
4.2 Please select the countries where your company uses or intends to use the Trademark
United States
4.2.1 Which year did your company begin (or expects to begin) using the RSPO Trademark
2021

5. Actions for Next Reporting Period

5.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

We believe that palm oil industry plays a prominent role in employment and economic development of the region, therefore it is important to support sustainable palm oil production. Depending on that, in 2013 RSPO membership has been applied to encourage using only certified sustainable palm oil, palm kernel oil and its derivatives in our products. As a first step, our sustainable palm oil supplying policy has been established and shared with our customers, stakeholders in communication and also suppliers in 2014 to promote for using sustainable sources and play active role globally. Since 2014, we are asking our suppliers to complete a detailed assessment of their sustainability policies and implementation. CCC will ensure that its staff, suppliers and customers are kept aware of this statement and their individual responsibilities by issuing a procedure on sustainable palm oil procurement.

Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules or email the ACOP team at acop@rspo.org

Labour	ጴ	Labour	Rights
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Yes

1.1 Does your company have a publicly-available policy covering Labour & Labour Rights?
Yes
1.1.1 Does the policy cover:
✓ No discrimination
✓ Wage and working conditions
Freedom of association
No child labour
✓ No harassment
✓ No forced or trafficked labour
Ethical Conduct & Human Rights
1.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?
Yes
Tes
1.2.1 Does the policy cover:
▼ Recruitment
✓ Contractors
✓ Sub-Contractors & Third-Party Contractors
Land Use
1.3 Does your company have a publicly-available Policy covering Land Use?
Yes
1.3.1 Does the policy cover:
✓ Free Prior and Informed Consent (FPIC)
☐ Compensation
Occupational Health & Safety
1.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?

Shared Responsibility Page 1/3

Climate Change & Greenhouse Gas (GHG)

Greenhouse Gas (ĠHG)?

Yes 1.5.1 Does the policy cover: ☐ Identification and assessment of GHG Monitored implementation plan to reduce or minimise GHG emissions **Complaints & Grievances** 1.6 Does your company have a Complaints & Grievances Mechanism? Yes 1.6.1 Is your Complaints & Grievance mechanism in line with the principles of the RSPO's grievance mechanism, which are the elements of fairness, transparency, and impartiality? Yes **Smallholders** 1.7 Does your company support oil palm independent smallholder groups? No 1.7.3 Do you have any future plans to support oil palm Independent Smallholders? No 1.7.4 Please explain why you are not planning to support oil palm independent smallholders

1.5 Does your company have a publicly-available policy covering Climate Change &

Shared Responsibility Page 2/3

Sustainable Palm Oil Policy

Yes

RSPO Shared Responsibility principles? Yes **Waste Management** 1.9 Does your company have a waste management plan? Yes Water Management 1.10 Does your company have a water management plan? Yes **Energy Use** 1.11 Does your company have an energy use plan covering fossil fuels and renewable energy? No **RSPO Services and Support** 1.12 Does your company provide services and support to the RSPO, eg. participation in RSPO Working Groups and Task Forces No **Shared Responsibility Resourcing** 1.13 Does your company have a plan to commit resources to ensure effective implementation of RSPO Shared Responsibility principles?

1.8 Does your company have a publicly-available Policy covering the implementation of

Shared Responsibility Page 3/3

Challenges and Support

1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?
Awareness of RSPO in the market
Difficulties in the certification process
☐ Certification of smallholders
Competition with non-RSPO members
High costs in achieving or adhering to certification
Human rights issues
☐ Insufficient demand for RSPO-certified palm oil
Low usage of palm oil
Reputation of palm oil in the market
Reputation of RSPO in the market
☐ Supply issues
☐ Traceability issues
☐ No challenges faced
✓ Others
Others
Our aim will be to supply SG certificated raw materials and to ensure the transition of the MB RSPO certificated PO, PKO sources in our products to upgrade level on supply chain. But possibility of using SG RSPO certificated PO fractions and PKO fractions still seems commercially very difficult, therefore this causes a deviation in the time plan. On the other hand, we have encountered economic obstacles along the way. MOQ and cost increase are the biggest factor for being unable to supply of RSPO SG certified materials. SG certified products are very expensive when they are compared with MB and increased costs in the finished product is not accepted by the customers. The availability of some physically sustainable palm fractions has also proved a challenge due to the lack of development in these supply chains. There is big pressure on the manufacturers because of globalization hence it gets more challenging for suppliers to fullfill the requirements of RSPO standards. But CCC has also experienced and learned a lots of things about RSPO and encourage all stakeholders to collaborate.
1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?
☐ Engagement with business partners or consumers on the use of CSPO
☐ Engagement with government agencies
Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
☐ Promotion of physical CSPO
☐ Providing funding or support for CSPO development efforts
Research & Development support
Stakeholder engagement
☐ No actions taken
✓ Others
Others
CCC mostly engages with its customers to encourage the use of RSPO and to help improving its customers sourcing strategy. And also CCC engages with its suppliers to promote its request for MB and SG materials.

Challenges & Support Page 1/2

1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

Challenges & Support Page 2/2