### Particulars

# **About Your Organisation** 1.1 Member Name D H Brothers Industries (Pty) Ltd t/a Willowton Group 1.2 Membership number 4-0155-11-000-00 1.3 Membership sector **Consumer Goods Manufacturers** 1.4 Membership category Ordinary 1.5 Country South Africa 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

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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

## **Processors & Traders**

1. Operational Profile
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1.1 Please state your company's main activity within the palm oil supply chain.
☐ Refiner of CPO and PKO
Palm Kernel Crusher
▼ Trader with Physical Possession
☐ Trader without Physical Possession
✓ Integrated Refiner-Trader-Processor
✓ Intermediate Products Producer
Power, Energy and Biofuel Processor
Animal Feed Producer
☐ Oleochemicals Producer
✓ Distribution & Logistics
Other
Other
<u>-</u>

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### 2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Sourcing is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed 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.

2.1 Please include details of all certified and uncertified operations using palm oil, palm kernel oil and related products, owned and/or managed by the member and/or all entities that belong to the group.

Supplier of Bulk Palm oil and fractions for food manufacturing-B2B Post refining of Palm oil for confectionery industry Manufacture of Industrial margarine and shortening

2.1.1	In which	markets	do you sel	l goods	with p	alm oil	and	palm	oil -rel	lated	prod	ucts?

Africa		

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 ACO	reporting cycles)

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### 2.2 Volumes of uncertified and certified palm oil, palm kernel oil and related product sourced in the year

Description	Tonnes
Crude palm oil, including derivatives refined from CPO (tonnes)	38142.0
Crude palm kernel oil, including derivatives refined from CPKO (tonnes)	1280.0
Crude palm kernel expeller (tonnes)	0.0
Total	39422.0

## ${\bf 2.3\ Volume\ of\ RSPO\text{-}certified\ palm\ oil}, palm\ kernel\ oil\ and\ related\ products\ sourced\ in\ the\ year\ (tonnes):$

	Crude Palm Crude Palm Kernel Oil				
Description	Oil (CSPO) and CSPO Derivatives	(CSPKO) and CSPKO Derivatives			
RSPO Credits from Mill / Crusher	0.0	0.0	0		
RSPO Credits from Independent Smallholder	0.0	0.0	0		
Mass Balance (MB)	18550.0	0.0	0		
Segregated (SG)	0.0	0.0	0		
Identity Preserved (IP)	0	0	0		
Total	18550.0	0.0	0		

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2.4 According to the volume information you have provided in Question PT.2.2 and Question PT.2.3, your company's certified palm oil, palm kernel oil and related products uptake is:

47.05%

2.4.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake calculated in PT.2.4. This may include changes due to business environment, evolving nature of operations or variations due to stock positions

Total Palm Oil Purchased: 38 142 tons Total Non Certified Palm Oil: 19 592

% RSPO Certified:49%

2.5 What is the estimated percentage of Certified Sustainable Palm Oil in the palm oil, palm kernel oil and related products sold, traded or processed by your company in the following regions:

Countries/Regions	Percentage
Europe	0.0
North America	0.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	50.0
Rest of World	0.0

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3. TimeBound Plan

Only in RSA

3.1 Which year did your company achieve/obtain (or expects to achieve/obtain) the RSPO supply chain certification or RSPO trader/distributor licence?
2017
3.2 Which year did your company start (or expect to start) to source any RSPO-certified palm oil and oil palm products?  2016
3.2.1 If the previous target year has not been met, please explain why.
Due to sufficient demand from our Customers
3.3 Which year did your company achieve (or expects to achieve) 100% RSPO certification of all palm product processing facilities.
2024
3.3.1 If the previous target year has not been met, please explain why.
Customers are slow to convert to Mass Balance
3.4 Year expected to only source 100% RSPO-certified palm oil and oil palm products.
2014
3.4.1 If target has not been met, please explain why.
As customer demand increases for 100% RSPO-certified palm oil

 $3.5\ lf$  the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why

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### 4. Actions For Next Reporting Period

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

On- going interaction with clients. Claim on web page as of May 2021

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## **Consumer Goods Manufacturers**

1. (	Operational	Profile	
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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
Producer of own palm oil and margarine branded products. Produces retail house brands

an aggregate level (as in previous ACOP reporting cycles)

### 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.

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

Bulk Oil for Manufacturing
Catering Oil
Margarine, Spreads and shortening- Industrial and retail
Soaps

2.1.1 In which markets does your company sell goods with palm oil and oil palm
products?

Africa

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:

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)	38142.0
Total volume of crude palm kernel oil (tonnes)	1280.0
Total volume of palm kernel expeller (tonnes)	0.0
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	0.0
Total	39422.0

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	-
Palm kernel oil-based derivatives and fractions	-

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	0.0
North America	0.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	100.0
Rest of World	0.0

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	0.0
RSPO Credits from Independent Smallholder	0.0	0.0	0.0	0.0
Mass Balance (MB)	24.5	0.0	0.0	0.0
Segregated (SG)	0.0	0.0	0.0	0.0
Identity Preserved (IP)	0.0	0.0	0.0	0.0
Total	24.5	0.0	0.0	0.0

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	-
Certified Palm kernel oil-based derivatives and fractions	<u>-</u>

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:

0.06%

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	0.0
North America	0.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	100.0
Rest of World	0.0

3. TimeBound Plan

3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?
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
2017
3.2.1 If the previous target year has not been met, please explain why.
Impact of add on cost of certified palm price.
Lack of consumer awreness
Lack of consumer awreness
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.
2017
3.3.1 If the previous target year has not been met, please explain why.
Impact of add on cost of certified palm price.
Lack of consumer awreness
2.4 Which wear did your company begin (or expects to begin) using 100% DCDO sortified
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.
sustainable palm oil and palm oil products from physical supply chain options (Identity
sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.
sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.  2025
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.  Impact of add on cost of certified palm price.
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.

### 4. Trademark Use

4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?
No
4.3 Please explain why your company does not plan to use the RSPO Trademark in ownbrand products
☐ Challenging reputation of palm oil
☐ Confusion among end-consumers
☐ Costs of changing labels
☐ Difficulty of applying for RSPO Trademark
✓ Lack of customer demand
☐ Limited label space
✓ Low consumer awareness
Low usage of palm oil
☐ Risk of supply disruption
Others
Others

### 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)

On-going customer awareness

## **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	ጲ	Labour	Rights
Laboul	Œ	Lubuui	IVIETICS

Yes	
1.1.1 Does the policy cover:	
✓ No discrimination	
Wass and working conditions	

1.1 Does your company have a publicly-available policy covering Labour & Labour Rights?

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

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?

No

#### Occupational Health & Safety

1.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?

Yes

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Climate Change & Greenhouse Gas (GHG)

1.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?

No

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?

Yes

Shared Responsibility Page 2/3

### Sustainable Palm Oil Policy

1.8 Does your company have a publicly-available Policy covering the implementation of 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?
Yes
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?
No

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
<del>-</del>
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?
your company supported the vision of the RSPO to transform markets to make
your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?
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
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
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
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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
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
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
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
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Challenges & Support Page 1/1