Particulars

About Your Organisation

1.1 Member Name

AVRIL SCA

1.2 Membership Number

2-0807-17-000-00

1.3 Membership Sector

Palm Oil Processors and/or Traders

1.4 Membership Category

Ordinary

1.5 Country

France

2.0 Does your company or organisation produce, process, consume or sell any palm oil or any products containing derivatives of palm oil?

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

- 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 Processors and/or Traders

will be required to complete the relevant ACOP section based on your selection(s).

- I trade or broker palm oil, palm kernel oil or related products Processors and/or Traders
- I am a refiner of palm oil or palm kernel oil Processors and/or Traders
- I am a processor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives Processors and/or Traders
- I am a B2B distributor or wholesaler of palm oil, palm kernel oil or related products Processors and/or Traders
- I manufacture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by 3rd party contractors Consumer Goods Manufacturers
- I retail final consumer (B2C) products containing palm oil, palm kernel oil or related products Retailers
- I operate food retail outlets that use palm oil, palm kernel oil or related products Retailers
- I am a conservation and environmental NGO supporting the sustainable development of the palm oil industry
- I am a social and human development NGO supporting the sustainable development of the palm oil industry

Yes

Processors & Traders

1. Operational Profile

- 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

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.

The Avril Group is active in France and internationally in sectors as diverse as agri-foods, livestock nutrition or renewable energies and chemistry. The Avril group uses palm oil* in the following sectors: oleochemistry (Oleon), soap and margarine (Lesieur Cristal), biodiesel (Saipol, Expur), animal nutrition (Sanders, MiXscience). *including palm oil/palm kernel oil, their fractions (including olein and stearin) and their derivatives (alcohols, fatty acids,

glycerin, esters, etc.).

Volumes data presented in sections PT2.2 and PT2.3 cover the following entities of the Avril Group:

- Oleon NV and its subsidiaries

- The Kerfoot Group Limited

2.1.1 In which markets do you sell goods with palm oil and palm oil-related products?

Europe ,North America ,China,India,Malaysia,Indonesia,Africa ,Latin America ,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 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)	104862.00
Crude palm kernel oil, including derivatives refined from CPKO (tonnes)	41679.00
Crude palm kernel expeller (tonnes)	0.00
Total	146541.00

2.3 Volume of RSPO-certified palm oil, palm kernel oil and related products sourced in the year (tonnes):

Description	Crude Palm Oil (CSPO) and CSPO Derivatives	Crude Palm Kernel Oil (CSPKO) and CSPKO Derivatives	Palm Kernel Expeller (CSPKE)
RSPO Credits from Mill / Crusher	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00
Mass Balance (MB)	18400.00	9742.00	0.00
Segregated (SG)	623.00	0.00	0.00
Identity Preserved (IP)	19.00	0.00	0.00
Total	19042.00	9742.00	0.00

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:

19.64%

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

Palm oils and palm derived products volumes at Kerfoot are very small and tend to decrease. 2021 volumes are much lower than 2020 due to an important stock of refined palm oil being available end of 2020 that's been sold throughout 2021 (so no new purchase needed). Kerfoot only trades RSPO certified palm products.

At Oleon, the supply and premium on the oils stayed stable and was of no major concern for the BU. However, for the palm derivatives (mainly PKO) the premium increased significantly throughout 2021 which impacted Oleon's business. From the sales point of view, Oleon customers' interest in certified palm stayed at the same level.

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:

Percentage
26
26
1
17
21
13
39
3
13

3. TimeBound Plan

3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification or RSPO trader/distributor licence?

2011

3.2 Which year did your company start (or expect to start) to source any RSPO-certified palm oil and oil palm products?

2011

3.2.1 If the previous target year has not been met, please explain why.

Year of first supply chain certification : - Effectively start in 2011 for Oleon,

- Effectively start in 2016 for Kerfoot

3.3 Which year did your company achieve (or expects to achieve) 100% RSPO certification of all palm product processing facilities.

2017

3.3.1 If the previous target year has not been met, please explain why.

Certification of all Kerfoot facilities achieved in 2016
 Certification of all Oleon facilities achieved in 2017

3.4 Year expected to only source RSPO-certified palm oil and oil palm products.

2019

3.4.1 If target has not been met, please explain why.

Since 2019 : Coverage of the Group's Palm Oil supplies by sustainability schemes :

We believe that in order to move towards greater sustainability, it is necessary to draw jointly on several schemes. Therefore, Avril equipped itself since 2019 with an internal standard which includes the following requirement: 100% of

supplies each year must be covered by sustainability schemes, by order of priority:

- RSPO Mass Balance (MB) or RSPO Segregated (SG) certificates that comply with requirements of customers concerned;
- ISCC-EU certificates to comply with European union regulations on biofuels;
- Field projects with suppliers or local plantation operators;
- RSPO credits purchased to enable the coverage of all supplies.

The 100% coverage target was met in 2019, in 2020 and in 2021.

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

Commitment described in 3.4.1 does cover all Group subsidiaries.

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)

- Participation in RSPO Working Group or Task Forces
- Support Independent Smallholders (ISH)
- Contribute to the RSPO Smallholder Trainer Academy
- Financial contribution to the RSPO Smallholder Support Fund
- Direct investments in Smallholder Certification projects
- Involvement/direct investments in Jurisdictional/Landscape approach
- Direct/collective investments in conservation and restoration initiatives
- Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
- Allocating FTE to promote the production or consumption of certified sustainable oil palm products
- Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
- No activities planned
- ✓ Others

Other

Direct investments in Smallholders certification projects : Oleon invests in Mariposa project, a smallholder certification project organized by Olenex in Honduras.

Involvment in Juridictional/Landscape approach : involvment in Aceh and Riau (Indonesia) projects, in partnership with Earthworm Foundation

Others : in May 2021, Avril group revealed its purpose "Serving the Earth". This purpose is embodied in six commitments. One of them is "Taking action to protect natural ressources and biodiversity". In particular, we are committed to ensuring that 100% of our palm (and soya) supplies directly come from sustainable agriculture by 2030.

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 (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on https://rspo.org/members/shared-responsibility or email the Shared Responsibility team at sharedresponsibility@rspo.org.

Information & Public Availability

1.1 Does your company have organisational management documents publicly-available?

Yes

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

Suppliers and Sub-Contractors

Legal Compliance

1.3 Does your company comply with all applicable legal requirements?

Yes

1.4 Does your company require its third party contractors to comply with legal requirements, i.e. including a clause on legal compliance in the contracts?

Yes

Complaints & Grievances

1.5 Does your company have a Grievance Mechanism that is accessible to all affected parties?

No

Land Use & FPIC

1.6 Does your company have a publicly-available policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the Palm Oil Supply chain?

Yes
1.6.1 Does your company have a procedure in place to identify legal, customary or user rights, and people entitled to compensation?
No
Smallholders
1.7 Does your company support oil palm smallholders (groups)?
Yes
1.7.1 Does your company report on the actions to support the inclusion of smallholders?
No
Labour & Labour Rights 1.8 Does your company have a publicly-available policy covering Labour & Labour Rights? Yes
1.8.1 Does the policy cover:
✓ No discrimination and equal opportunities
 Pay and working conditions at least at legal or industry minimum standards and are sufficient to provide decent living wages (DLW) Freedom of association and Collective bargaining
 Protection of children, as well as the workforce of suppliers and third-party contractors
 Prevention of all forms of harassment, including sexual harassment
No forced or trafficked labour
Occupational Health & Safety
1.9 Does your company have a publicly-available Policy covering Occupational Health & Safety?
Yes
1.9.1 Does your company have a Standard Operating Procedure (SOP) for Occupational Health & Safety?
Yes



Waste Management

1.10a Does your company have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?

Yes

1.10a.1 Is this plan implemented?

Yes

Water Management

1.11 Does your company have a water management plan to promote efficient use and continued availability of water sources?

No

Energy Use

1.12 Does your company have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?

Yes

1.12.1 Are there records of implementation of the plan ie. monitoring and reporting?

Yes

Climate Change & Greenhouse Gas (GHG)

1.13 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?

Yes

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

Some NGOs and clients require that sustainable palm policies of processors (such as the Avril group) rely more on direct commitment in transformation projects on the field rather than on sustainability certifications.

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?

- Communication and/or engagement to transform the negative perception of palm oil
- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Engagement with peers and clients
- Promotion of CSPO through off product claims
- 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

Avril formalized its Sustainable Palm Policy in 2016, and reviewed it in 2020. Through it, the Group aims to ensure that only zero deforestation palm oil will be used. This policy, drawn up in the context of combined efforts with an NGO, The Earthworm Foundation (EF), applies to all the palm oil purchased by different Group subsidiaries. Moreover, Avril aims at assuring a 100% traceability back to the mills for all its palm oil purchases and contributes to transformation on the field by financially supporting on-the-ground programmes, including EF's APT Programme in Indonesia. Avril has also a partnership agreement with EF where they analyse our mill list for potential risks and support us when we receive a grievance case.

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

See our sustainable policy here : https://presse.groupeavril.com/wp-content/uploads/2021/11/sustainable-palm-policy.pdf See details on our actions to address our commitment on sustainable sourcing on p.34-35 https://presse.groupeavril.com/wp-content/uploads/2022/05/rai-2021.pdf