

## Particulars

### About Your Organisation

#### 1.1 Member Name

Citi

#### 1.2 Membership Number

5-0011-10-000-00

#### 1.3 Membership Sector

Banks and Investors

#### 1.4 Membership Category

Ordinary

#### 1.5 Country

Indonesia

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

No

#### 2.2 Please select all the sectors that best describe the business activities of your company or organisation, including your primary RSPO membership sector. You may select multiple sectors and will be required to complete the ACOP form for the relevant sectors

- I am a bank or financial institution that finances or supports companies or organisations that produce or manufacture palm oil, palm kernel oil or related products
- 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
- I am an Affiliate member of the RSPO, indirectly involved in the palm oil industry

## Bank & Investors

### 1. Operational Profile

**1.1 Please state your company's main activity(ies) within palm oil-related financing. Please select all applicable option(s).**

- Corporate / Commercial Banking
- Trade Finance
- Private Banking
- Investment / Equity
- Debt / Capital Market
- Other

Other

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### 2. Operations in Palm Oil

**2.1 What types of financial services does your company provide to the palm oil industry?**

- Trade Solutions
- Lending/Loans
- Leasing
- Treasury Products
- Cash Management Products
- Investments
- Insurance
- Other

Other

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**2.2 For your company's palm oil-related activities, which geographic region(s) do you operate in?**

- Worldwide
- Africa
- Europe
- North America
- South America
- Middle East
- China
- India
- Indonesia
- Malaysia
- Oceania
- Rest of Asia

### 3. Palm Oil Policy and Progress

#### 3.1 Does your company have a lending or investment policy on palm oil?

Yes

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#### 3.2 Which supply chain sectors does your palm oil policy cover?

- Growers
- Traders
- Processors
- Consumer Goods Manufacturers
- Retailers
- Others

Others

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#### 3.3 Does your policy on palm oil make a specific reference to RSPO-certified sustainable palm oil and oil palm products, and/or RSPO certification?

Yes

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#### 3.4 Does your company have a policy that requires all your palm oil clients to be RSPO members?

Yes

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#### 3.5 Does your company require your clients to have a public TimeBound Plan for 100% RSPO certification or uptake?

Yes

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#### 3.6 When do you expect to require all your Grower clients to be RSPO certified?

2013

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#### 3.7 When do you expect to require your clients in all other sectors to be RSPO certified?

N/A

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**3.8 Which regions do the above commitments cover?**

- Worldwide
- Africa
- Europe
- North America
- South America
- Middle East
- China
- India
- Indonesia
- Malaysia
- Oceania
- Rest of Asia

**3.9 What measures do you take if a client is not meeting the requirements of your policy on palm oil?**

If a client is not a member of the RSPO we will make the continuation of the financial relationship contingent upon a time-bound action plan of no longer than 3 years to become a member. If a client is at risk of losing their membership we will work with the client to develop a short term action plan to realign with the RSPO principles and criteria. If a client cannot or decides they are not willing to meet the requirements of RSPO membership we will exit the relationship.

**3.10 Do you proactively engage with your clients to support and join the RSPO?**

Yes

**3.11 Did members of your company participate in RSPO working groups and/or taskforces during the reporting period?**

No

**3.12 Does your company have any collaborations with public or private sector palm oil industry players to support them in their efforts to increase the production or consumption of certified sustainable palm oil (CSPO)?**

Yes

**3.13 What other activities have your company undertaken to promote RSPO-certified sustainable palm oil and oil palm products during the reporting period?**

We continued our firmwide agricultural portfolio review where we engaged our palm oil clients in business segments beyond growers to understand the total uptake of RSPO among processors and traders in our client portfolio as we continue to develop ways to enhance our approach across the supply chain. During the process we have encouraged our processor and trader clients to join the RSPO in the few cases that they were not yet members.

It is a normal part of our review and due diligence process of our palm oil and palm oil related clients to promote the adoption of RSPO certification and membership when not specifically required by our policy.

#### 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

Citi will continue to enhance our approach to promote CSPO uptake with clients throughout the palm oil supply chain. We will engage our higher risk RSPO member clients and support them in better aligning their environmental and social management systems with the RSPO principles and criteria when gaps become evident during our annual and transaction based environmental and social risk review process. We will also continue to engage all potential new clients at onboarding who are not RSPO members to take steps to become RSPO certified as a condition to providing financial services.

Citi will be focused on enhancing our approach to forced labor in the palm oil sector through enhanced engagements and forced labor oriented questionnaires.

## 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](mailto:sharedresponsibility@rspo.org).*

### Information & Public Availability

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

Yes

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### Ethical Conduct & Human Rights

**1.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?**

Yes

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**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

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**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

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### Complaints & Grievances

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

Yes

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**1.5.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?**

No

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**Smallholders****1.7 Does your company support oil palm smallholders (groups)?**

No

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**Labour & Labour Rights****1.8 Does your company have a publicly-available policy covering Labour & Labour Rights?**

Yes

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**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

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**1.9.1 Does your company have a Standard Operating Procedure (SOP) for Occupational Health & Safety?**

Yes

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**Waste Management****1.10b Does your company have a statement of intent to reduce, recycle, reuse and disposal based on the hazardous characteristics?**

Yes

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**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

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## 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

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### 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

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### 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

<https://www.citigroup.com/citi/about/esg/download/2021/Global-ESG-Report-2021.pdf>  
<https://www.citigroup.com/citi/sustainability/data/Environmental-and-Social-Policy-Framework.pdf>