Particulars

About Your Organisation

1.1 Member Name
FINSBURY FOOD GROUP PLC
1.2 Membership Number
4-0522-14-000-00
1.3 Membership Sector
Consumer Goods Manufacturers
1.4 Membership Category
Ordinary
1.5 Country
United Kingdom
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 - Processors and/or Traders
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

Particulars Page 1/1

1. Operational Profile

Consumer Goods Manufacturers

1.1 Please state your company's main activity within the palm oil supply chain.					
	Food Good Manufacturer - own brand				
lacksquare	Food Good Manufacturer - third-party brand				
	Home & Personal Care Good Manufacturer - own brand				
	Home & Personal Care Good Manufacturer - third-party brand				
	Ingredient Manufacturers				
	Biofuels				
lee	Other				
Oth	er				

We manufacture both 3rd party brands (Consisting of Retailer own labels and Licensed Brands) and own brand products but predominanately 3rd party brands

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

Memory Lane Cakes Lightbody Celebration Cakes

Nicholas and Harris Ltd Fletchers Bakeries Ltd Ultrapharm Ltd
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?
Europe ,Malaysia,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

Tonnes
2927.65
343.23
0.00
160.15
3431.03

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	80
Palm kernel oil-based derivatives and fractions	20

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.

Countries/Regions	Percentage
Europe	97
North America	0
Malaysia	1
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	2

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	0.00	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00	0.00
Mass Balance (MB)	7.89	0.06	0.00	17.36
Segregated (SG)	2848.76	343.94	0.00	87.25
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	2856.65	344.00	0.00	104.61

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	80
Certified Palm kernel oil-based derivatives and fractions	20

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:

96.33%

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.

Where we manufacture customer/3rd Party branded products and where they supply branded components, for use in the finished product, that they manufacture, we have limited information regarding whether they are sustainably sourced Palm Oil and we are not provided with the level of detail to clarify sources. These items are only used in the specfic customer/3rd party own branded finished products that we manufacture.

2.6 Please estimate the regional sales volume distribution of your company's RSPO certified palm oil, palm kernel oil and related products (as declared in Question 2.4) in the following countries/regions:

Countries/Regions	Percentage
Europe	97
North America	0
Malaysia	1
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	2

3	Tim	eRo	nnd	Plan	

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 2013
20.0
3.2.1 If the previous target year has not been met, please explain why.
Met
All our own brand products and retailer branded products are compliant however we produce some products under customers own licensed brands where they supply us with some components. They are unwilling to supply further information with regards to palm oil sustainability. This is out of our control and these products are only used within the customers own brand.
3.3 Which year did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil and palm oil products from any supply chain option in own-brand products.
2020
3.3.1 If the previous target year has not been met, please explain why.
Met
All our own brand products and retailer branded products are compliant however we produce some products under customers own licensed brands where they supply us with some components. They are unwilling to supply further information with regards to palm oil sustainability. This is out of our control and these products are only used within the customers own brand.
3.4 Which year did your company begin (or expects to begin) using only 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.
3.4.1 If the previous target year has not been met, please explain why.
Met
All our own brand products and retailer branded products are compliant however we produce some products under customers own licensed brands where they supply us with some components. They are unwilling to supply further information with regards to palm oil sustainability. This is out of our control and these products are only used within the customers own brand.
3.6.3 Please explain why your company does not have such a TimeBound Plan
Where we have control over sourcing we are sourcing and using 100% RSPO Certified Sustainable Palm Oil where these options are available. If there are no RSPO sustainable sources available we are actively looking for alternatives materials if feasible. See Question 3.2.1 as to why we cannot have a timebound plan to cover the production of all products that are

manufactured on behalf of others

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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
Ireland ,United Kingdom
4.2.1 Which year did your company begin (or expects to begin) using the RSPO Trademark
2020

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)
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
<u>-</u>

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? No **Ethical Conduct & Human Rights** 1.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights? No **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? Yes 1.5.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System? Yes

Shared Responsibility Page 1/3

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?
No
Smallholders
1.7 Does your company support oil palm smallholders (groups)?
No
Labour & Labour Rights
1.8 Does your company have a publicly-available policy covering Labour & Labour Rights?
No
Occupational Health & Safety
1.9 Does your company have a publicly-available Policy covering Occupational Health & Safety?
No
1.9.1 Does your company have a Standard Operating Procedure (SOP) for Occupational Health & Safety?
No

Shared Responsibility Page 2/3

Waste Management

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

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 -
1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supporte 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
-
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
Reports are not publically available

Challenges & Support Page 1/1