# **Particulars**

About Your Organisation	
1.1 Member Name	
Brothers Baking Company	
2 1 3	
1.2 Membership Number	
4-0909-17-000-00	
1.3 Membership Sector	
Consumer Goods Manufacturers	
1.4 Membership Category	
Ordinary	
1.5 Country	
United States	
2.0 Does your company or organisation proderivatives of palm oil?  Yes	duce, process, consume or sell any palm oil or any products containing
	ibe the palm oil-related activities of your company or organisation. ted to the primary sector of the member's RSPO membership. You COP section based on your selection(s).
I own and operate oil palm estate(s) and/or palm o	il mill(s)
☐ I represent a palm oil Independent Smallholder far	rmer Group
I own and operate independent palm oil mills	
☐ I own and operate independent palm kernel crushi	ng plants - Processors and/or Traders
☐ I trade or broker palm oil, palm kernel oil or relate	ed products - Processors and/or Traders
I am a refiner of palm oil or palm kernel oil - Proc	essors and/or Traders
☐ I am a processor of intermediate (B2B) palm oil, p	palm kernel oil or related fractions/derivatives - Processors and/or Traders
☐ I am a B2B distributor or wholesaler of palm oil, Ţ	palm kernel oil or related products - Processors and/or Traders
I manufacture final consumer (B2C) products cont 3rd party contractors - Consumer Goods Manufact	taining palm oil, palm kernel oil or related products. This includes products manufactured by urers
☐ 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	n kernel oil or related products - Retailers
I am a conservation and environmental NGO supp	orting the sustainable development of the palm oil industry
I am a social and human development NGO suppo	orting the sustainable development of the palm oil industry

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# **Consumer Goods Manufacturers**

1.	Or	oer	ati	ona	ıl	P	ro	fil	le
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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
-

### 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

Brothers Baking Co., Inc. 27260 Max Street Edwardsburg, MI 49112
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?
North America â°
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)	413.89
Total volume of crude palm kernel oil (tonnes)	0.00
Total volume of palm kernel expeller (tonnes)	0.00
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	0.00
Total	413.89

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	0
Palm kernel oil-based derivatives and fractions	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.

Countries/Regions	Percentage
Europe	0
North America	100
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	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)	Palm Kernel	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)	413.89	0.00	0.00	0.00
Segregated (SG)	0.00	0.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	413.89	0.00	0.00	0.00

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	0
Certified Palm kernel oil-based derivatives and fractions	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:

100.00%

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 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	0
North America	100
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	0

### 3. TimeBound Plan

3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?
2018
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
2018
3.2.1 If the previous target year has not been met, please explain why.
<del>-</del>
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.
2018
3.3.1 If the previous target year has not been met, please explain why.
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.
2018
3.4.1 If the previous target year has not been met, please explain why.
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### 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 own-brand 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)
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
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### **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 organisation have organisational management documents publicly-available? No **Ethical Conduct & Human Rights** 1.2 Does your organisation have a publicly-available Policy covering Ethical Conduct & Human Rights? No Legal Compliance 1.3 Does your organisation comply with all applicable legal requirements? Yes 1.4 Does your organisation 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 organisation 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

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### Land Use & FPIC

1.6 Does your organisation 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 organisation support oil palm smallholders (groups)?
Yes
1.7.1 Does your organisation report on the actions to support the inclusion of smallholders?
No
Labour & Labour Rights
1.8 Does your organisation have a publicly-available policy covering Labour & Labour Rights?
No
Occupational Health & Safety
1.9 Does your organisation have a publicly-available Policy covering Occupational Health & Safety?
No
1.9.1 Does your organisation have a Standard Operating Procedure (SOP) for Occupational Health & Safety?
Yes

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### Waste Management

1.10a Does your organisation 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 organisation have a water management plan to promote efficient use and continued availability of water sources?
Yes
1.11.1 Is this plan implemented?
Yes
Energy Use
1.12 Does your organisation have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?
No
Climate Change & Greenhouse Gas (GHG)
1.13 Does your organisation 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?
No

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### Claims and labels

 ${\bf 1.15\ Does\ your\ organisation\ promote\ the\ use\ of\ off-product\ RSPO\ claims\ and\ labels?}$ 

No

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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
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
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  We are a privately held company and do not post our policies.

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