Particulars

About You	r Organisation
1.1 Memb	er Name
PHARMA	-TRADE A/S
1.2 Memb	ership Number
4-0972-17	-000-00
1.3 Memb	ership Sector
Consumer	Goods Manufacturers
1.4 Memb	ership Category
Ordinary	
1.5 Count	ry
Denmark	
	our company or organisation produce, process, consume or sell any palm oil or any products containing s of palm oil?
Yes	
Multiple s	select all description(s) that describe the palm oil-related activities of your company or organisation. elections are allowed, and not limited to the primary sector of the member's RSPO membership. You quired to complete the relevant ACOP section based on your selection(s).
	nd operate oil palm estate(s) and/or palm oil mill(s)
_	ent a palm oil Independent Smallholder farmer Group
	nd operate independent palm oil mills and operate independent palm kernel crushing plants - Processors and/or Traders
—	or broker palm oil, palm kernel oil or related products - Processors and/or Traders
	efiner of palm oil or palm kernel oil - Processors and/or Traders
	rocessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
	32B distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
✓ I manuf	acture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by contractors - Consumer Goods Manufacturers
I retail 1	inal consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
☐ I operat	e food retail outlets that use palm oil, palm kernel oil or related products - Retailers
I am a c	onservation and environmental NGO supporting the sustainable development of the palm oil industry
Lamac	ocial and human development NGO supporting the sustainable development of the palm oil industry

Particulars Page 1/1

Consumer Goods Manufacturers

	1. O	perational	l Profil	e
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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

Persano Group A/S	
2.1.1 In which markets does your company sell goods with palm oil and oil palm p	products?
Europe â°	
•	
DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members	s operating within the palm oil
demand supply chain can now choose to report palm oil and palm oil product vol	umes 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)	0.00
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)	390.00
Total	390.00

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	66
Palm kernel oil-based derivatives and fractions	34

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.

Percentage
100
0
0
0
0
0
0
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)	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)	0.00	0.00	0.00	351.00
Segregated (SG)	0.00	0.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	351.00

 $2.4.1\ Please\ estimate\ the\ percentage\ of\ RSPO\text{-}certified\ derivatives\ and\ fractions\ (reported\ in\ Question\ CG.2.4)}$ 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	69
Certified Palm kernel oil-based derivatives and fractions	31

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:

90.00%

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.

In reality, we buy more certified ingredients but due to technical restrictions in our database it is not possible to calculate with raw materials if one of several suppliers is not certified - then none will be calculated as certified even though in reality they are.

Also, if a non-certified supplier will not give data on percentage of PO and PKO, we calculate with worst case scenario meaning we calculate with more non-certified material than necessary for some suppliers.

We are still working on excluding suppliers not certified, but we still feel the effects of disruption in supply chains. We have had a few cases where we needed to go back to un-certified material for a while, but we have succeeded in finding certified suppliers for others and therefore the overall percentages are going in the right direction. But please know it has been a struggle in 2022.

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

Countries/Regions	Percentage
Europe	100
North America	0
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
3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?
Yes
3.6.1 Does your company have a TimeBound Plan to only use RSPO-certified sustainable palm oil and palm oil products in the goods you manufacture on behalf of other companies?
Yes
3.6.2 When do you expect all products manufactured on behalf of other companies to only contain RSPO-certified sustainable palm oil and palm oil products?
2030

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
Participation in Danish Alliance for Sustainable Palm oil. Across sectors working together - both to educate consumers locally in regards to sustainablity and palm-based products, but also sharing learnings.

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? Yes 1.2.1 Does the policy cover: Ethical conduct for contractors Ethical conduct for recruitment Respect of human rights, including for suppliers and sub-Contractors **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

Shared Responsibility Page 1/4

Land Use & FPIC

Informed Consent (FPIC) in the Palm Oil Supply chain?
No
Smallhaldara
Smallholders
1.7 Does your organisation support oil palm smallholders (groups)?
No
Labour & Labour Rights
1.8 Does your organisation 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 organisation have a publicly-available Policy covering Occupational Health & Safety?
Yes
1.9.1 Does your organisation have a Standard Operating Procedure (SOP) for Occupational Health & Safety?
Yes

1.6 Does your organisation have a publicly-available policy covering Commitment to respect Free Prior and

Shared Responsibility Page 2/4

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?
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 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?
Yes

Shared Responsibility Page 3/4

Claims and labels

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

Yes

Shared Responsibility Page 4/4

Challenges and Support

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

1.1 What significant obstacles or challenges has your company encountered in the promotion of certified

Mill list is a big challenge for us. We have around 40 different suppliers of RSPO-certified raw materials (solely derivates) and we are almost at the end of the supply chain. Getting information for the Mill List from our suppliers is a challenge. We do have from a few of them, but we have chosen not to publish it yet since it is lacking so much information. It is very unsatisfactory having criteria that is almost impossible to meet. We could choose not to buy from those suppliers - but that would reduce our uptake of certified material dramatically which we deem is worse.

A lot of our suppliers have not been able to deliver in certified quality in 2022 even though they used to.

Challenges & Support Page 1/2

the vision of the RSPO to transform markets to make sustainable palm oil the norm?	rteu
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 pol and activities, please provide the links here	licies
https://persano.dk/files/Handlingsplan_for_ansvarlig_palmeolie_maj_2023.pdf	

Challenges & Support Page 2/2