Particulars

About Your Organisation 1.1 Member Name ATHANASIOS D.KOUKOUTARIS SA dba "alfa" 1.2 Membership Number 4-1323-20-000-00 1.3 Membership Sector Consumer Goods Manufacturers 1.4 Membership Category Ordinary 1.5 Country Greece 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

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I am a social and human development NGO supporting the sustainable development of the palm oil industry

Consumer Goods Manufacturers

1. Operational Profile
1.1 Please state your company's main activity within the palm oil supply chain

	Food Good Manufacturer - own brand
\checkmark	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
Otl	ner
-	

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

Production of dough products Fully owned (100%)
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?
Europe ,North 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 Total volume of RSPO-certified (IP, MB, SG and RSPO Credits/Book and Claim) and Non RSPO-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)	1461.60
Total	1461.60

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	100
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	85
North America	10
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	5

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)	0.00	0.00	0.00	0.00
Segregated (SG)	0.00	0.00	0.00	242.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	242.00

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	100
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:

16.56%

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.

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

85
10
0
0
0
0
0
0
5

3. TimeBound Plan

3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?
2021
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

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	
\mathbf{Y}	Others	
Otl	ner	
for	e intend within the next years to make the transition to certified palm oil products (where palm oil exists as an ingredient) the PL channel and the third-parties products (this has to do with our customers so it is not sure). Regarding alfa brand ducts, it has to do with the customers' and consumers' culture around palm oil, so it cannot be answered.	

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.

https://rspo.org/members/shared-responsibility or email the Shared Responsibility team at sharedresponsibility@rspo.org.
SR 1. Transparency
1.1 Does your organisation have organisational management documents publicly-available?
Yes
SR 2. Ethical Conduct
1.2 Does your organisation have a publicly-available policy covering Ethical Conduct, including for recruitment and contractors?
Yes
SR 3 and SR 4. 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?
Yes
SR 7. Claims and labels
1.7a Does your organisation promote the use of off-product RSPO claims and labels?
Yes
SR 8. Information and outreach activities
1.8 Does you organisation implement transparent communication and outreach activities to promote sustainable palm oil?
No
SR 9. Human Rights
1.9 Does your organisation have a publicly-available Policy on respect for human rights, including for suppliers and sub-contractors?
$\mathbf{V}_{\mathbf{a}\mathbf{c}}$

Shared Responsibility Page 1/4

✓ No forced or trafficked labour

SR 10. Complaints & Grievances	
1.10 Does your organisation have a Grievance Mechanism that is accessible to all affected parties?	
Yes	
1.10.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?	
Yes	
SR 11 and SR 12. Land Use and FPIC	
1.11a Does your organisation have a policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the operational Palm Oil Supply chain?	
No	
SR 13 and SR 14. Smallholders inclusion	
1.13 Does your organisation support oil palm smallholders (groups)?	
No	
SR 15 - SR 20. Labour & Labour Rights	
1.15 Does your organisation have a publicly-available policy covering Labour & Labour Rights?	
Yes	
1.15.1 Door the policy covery	
1.15.1 Does the policy cover:	
No discrimination and equal opportunities	
Pay and conditions of the workers.	
Freedom of association and Collective bargaining	
Protection of children and remediation for suppliers and third party contractors.	
Prevention of all forms of harassment, including sexual harassment	

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SR 21. Occupational Health & Safety
1.21 Does your organisation have a publicly-available Policy covering Occupational Health & Safety?
Yes
SR 22. Waste Management
1.22a Does your organisation have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?
Yes
1.22a.1 Is this plan implemented?
Yes
SR 23. Water Management
1.23 Does your organisation have a water management plan to promote efficient use and continued availability of water sources?
Yes
1.23.1 Is this plan implemented?
Yes
SR 24. Energy Use
1.24 Does your organisation have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?
Yes
1.24.1 Are there records of implementation of the plan ie. monitoring and reporting?
No
SR 25. Cllimate Change and Greenhouse Gases (GHG)
1.25 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?
them? No

Shared Responsibility Page 3/4

SR 26. Promotion of certification/uptake

RSPO Annual Communication of Progress 2023

1.26b Does your organisation meet the SR CSPO uptake target?	
No	
1.26b.1 Why not?	
Lack of knowledge on the SR uptake target and /or how to calculate it	
Lack of suppliers.	
✓ Lack of demand from my clients	
Other	
SR 27. Sustainable Palm Oil Policy	
1.27a Does your organisation have other relevant policies as a sustainable palm oil sourcing policy?	
M.	
No	
SR 28 and SR 29. Support and resourcing	
1.28 Does your organisation provides services and support to RSPO and resources to implement SR?	
No	

Shared Responsibility Page 4/4

Challenges and Support

	tainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?
\checkmark	Awareness of RSPO in the market
	Difficulties in the certification process
	Certification of smallholders
\checkmark	Competition with non-RSPO members
\checkmark	High costs in achieving or adhering to certification
	Human rights issues
	Insufficient demand for RSPO-certified palm oil
	Low usage of palm oil
\mathbf{Y}	Reputation of palm oil in the market
	Reputation of RSPO in the market
	Supply issues
	Traceability issues
	No challenges faced
	Others
Oth	ners
	In addition to the actions already reported in this ACOP report, what other ways has your company supported 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 attributed in the CSPO are the state of
	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
	Oulcis
Oth	ners
1.3 and	If your company has any other publicly-available reports or information regarding its palm oil-related policies l activities, please provide the links here

Challenges & Support Page 1/1