## **Particulars**

About Yo	our Organisation
1.1 Men	ber Name
Greggs P	LC
1.2 Men	bership Number
3-0111-1	9-000-00
1.3 Men	bership Sector
Retailers	
1.4 Men	bership Category
Ordinary	
1.5 Cour	ntry
United K	ingdom
	your company or organisation produce, process, consume or sell any palm oil or any products containing es of palm oil?
Yes	
Multiple	e select all description(s) that describe the palm oil-related activities of your company or organisation. selections are allowed, and not limited to the primary sector of the member's RSPO membership. You equired 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 repr	esent 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 trad	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 man 3rd pa	$ufacture\ final\ consumer\ (B2C)\ products\ containing\ palm\ oil,\ palm\ kernel\ oil\ or\ related\ products.\ This\ includes\ products\ manufactured\ rty\ contractors\ -\ Consumer\ Goods\ Manufacturers$
I retai	I final consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
☐ I open	ate 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

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## Retailers

1. (	Operational Profile
	1 Please state your company's main activity(ies) within the palm oil supply chain. Please select all options that oply to your operations.
<b>~</b>	Retail - with own brand products
	Retail - without own brand products
	Food service providers
	Retail wholesalers
	Other
О	ther
Ir in R	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  SPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports  ithout reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports  any lead to suspension or termination of RSPO membership.
	1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are wned and/or managed by the member, including those under Group Membership
G	reggs PLC
2.	1.1 In which markets does your company sell goods with palm oil and oil palm products?
E	urope

an aggregate level (as in previous ACOP reporting cycles)

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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 products. Third-party brand products containing palm oil should be excluded.

Description	Tonnes
Total volume of crude palm oil (tonnes)	13694.00
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)	0.00
Total	13694.00

2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question RT.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	100
North America	0
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	0

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2.4 Total volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand products. Third-party brand products containing palm oil should be excluded.

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)	264.00	0.00	0.00	0.00
Segregated (SG)	13430.00	0.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	13694.00	0.00	0.00	0.00

2.4.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question RT.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 Sustainable Palm Oil 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.

100% is RSPO certified.

98.1% is certified as segregated, the remaining 1.9% is certified as mass balance.

We have committed to all palm being segregated by the end of 2025.

We have identified the materials containing mass balance palm and will convert to segregate or replace these materials.

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

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

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#### 3. TimeBound Plan

3.1 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products
2019
3.1.1 If the previous target year has not been met, please explain why.
N/A targets met.
3.2 Which year did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil, palm kernel oil and related products from any supply chain option in own-brand products.
2019
3.2.1 If the previous target year has not been met, please explain why.
N/A target met.
3.3 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.
2019
3.3.1 If the previous target year has not been met, please explain why.
N/A target met.
3.4 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why
N/A covers al countries in which we operate.

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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
United Kingdom
4.2.1 Which year did your company bogin (or expects to bogin) using the DSDO Trademout
4.2.1 Which year did your company begin (or expects to begin) using the RSPO Trademark
2021

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## 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
We are members of the UK SCI (sustainable Commodities Initiative) established by Efeca. We are also signatories of the Soy Manifesto and Round Table.
We are meeting with Chester Zoo to see how we could support the sustainable palm communities project.
We are members of the UK palm oil round table co-ordinated by Efeca.

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Yes

## **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.

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?
Yes
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?

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✓ 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?
Yes
1.11a.1 Does your organisation have a procedure in place to identify legal, customary or user rights, and people entitled to compensation?
Yes
CD 12 1 CD 14 C W 11 1 1 1
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 Does the policy cover:
✓ No discrimination and equal opportunities
Y 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?
No
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?
Yes
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?
Yes

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SR 26. Promotion of certification/uptake
1.26b Does your organisation meet the SR CSPO uptake target?
Yes
SR 27. Sustainable Palm Oil Policy
1.27a Does your organisation have other relevant policies as a sustainable palm oil sourcing policy?
Yes
SR 28 and SR 29. Support and resourcing
1.28 Does your organisation provides services and support to RSPO and resources to implement SR?
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
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
Greggs annual Pledge Report. https://a.storyblok.com/f/162306/x/48abf22d24/greggs-sustainability-report-2022.pdf

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