Particulars

About Your Or	ganisation
1.1 Member Na	me
Switzgroup Euro	pe Ltd
1.2 Membership) Number
2-1176-21-000-0	00
1.3 Membership	Sector
Palm Oil Process	ors and/or Traders
1.4 Membership	o Category
Ordinary	
1.5 Country	
Cyprus	
2.0 Does your c derivatives of p	ompany or organisation produce, process, consume or sell any palm oil or any products containing alm oil?
Yes	
Multiple selecti	all description(s) that describe the palm oil-related activities of your company or organisation. ons are allowed, and not limited to the primary sector of the member's RSPO membership. You to complete the relevant ACOP section based on your selection(s).
=	ate oil palm estate(s) and/or palm oil mill(s)
	alm oil Independent Smallholder farmer Group
I own and open	ate independent palm oil mills
_	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders
I trade or broke	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders are palm oil, palm kernel oil or related products - Processors and/or Traders
I trade or broke	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders or palm oil, palm kernel oil or related products - Processors and/or Traders of palm oil or palm kernel oil - Processors and/or Traders
I trade or broke I am a refiner of I am a processor	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders are palm oil, palm kernel oil or related products - Processors and/or Traders of palm oil or palm kernel oil - Processors and/or Traders or of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
☐ I trade or broke ☐ I am a refiner of ☐ I am a processon ☐ I am a B2B dis	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders are palm oil, palm kernel oil or related products - Processors and/or Traders of palm oil or palm kernel oil - Processors and/or Traders or of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders tributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
I trade or broke I am a refiner of I am a processo I am a B2B dis ✓ I manufacture and party control	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders or palm oil, palm kernel oil or related products - Processors and/or Traders of palm oil or palm kernel oil - Processors and/or Traders or of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders tributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured factors - Consumer Goods Manufacturers
I trade or broke I am a refiner of I am a processo I am a B2B dis I manufacture 3rd party contro I retail final co	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders er palm oil, palm kernel oil or related products - Processors and/or Traders of palm oil or palm kernel oil - Processors and/or Traders or of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders tributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured factors - Consumer Goods Manufacturers finsumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
I trade or broke I am a refiner of I am a processo I am a B2B dis I manufacture and party control I retail final co I operate food	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders or palm oil, palm kernel oil or related products - Processors and/or Traders of palm oil or palm kernel oil - Processors and/or Traders or of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders tributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured factors - Consumer Goods Manufacturers insumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers retail outlets that use palm oil, palm kernel oil or related products - Retailers
I trade or broke I am a refiner of I am a processo I am a B2B dis I manufacture and party control I retail final co I operate food I am a conservi	ate independent palm oil mills ate independent palm kernel crushing plants - Processors and/or Traders er palm oil, palm kernel oil or related products - Processors and/or Traders of palm oil or palm kernel oil - Processors and/or Traders or of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders tributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured actors - Consumer Goods Manufacturers insumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers

Particulars Page 1/1

Processors & Traders

1. Operational Profile

1.1 Please state your company's main activity within the palm oil supply chain.
Refiner of CPO and PKO
Palm Kernel Crusher
Trader with Physical Possession
✓ Trader without Physical Possession
☐ Integrated Refiner-Trader-Processor
☐ Intermediate Products Producer
Power, Energy and Biofuel Processor
Animal Feed Producer
Oleochemicals Producer
✓ Distribution & Logistics
✓ Other
Other
Manufacturer of B2B confectionery products using PO & PKO as ingredients

Processor and/or Trader Page 1/6

2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Sourcing is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed 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 include details of all certified and uncertified operations using palm oil, palm kernel oil and related products, owned and/or managed by the member and/or all entities that belong to the group.

OLYMPIC FOODS LTD, REVLINO CY, SWITZGROUP TRADING LTD CY, KRITON ARTOS SA, IONIKI SFOLIATA SA, BORGCRAFT PTY, ARTIZAN HELLAS SA

2.1.1 In which markets do you sell goods with palm oil and palm oil-related products?

Europe ,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)

Processor and/or Trader Page 2/6

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 product sourced in the year

Description	Tonnes
Crude palm oil, including derivatives refined from CPO (tonnes)	130.26
Crude palm kernel oil, including derivatives refined from CPKO (tonnes)	142.56
Crude palm kernel expeller (tonnes)	0.00
Total	272.82

2.3 Volume of RSPO-certified palm oil, palm kernel oil and related products sourced in the year (tonnes):

Description	Crude Palm Oil (CSPO) and CSPO Derivatives	Crude Palm Kernel Oil (CSPKO) and CSPKO Derivatives	Palm Kernel Expeller (CSPKE)
RSPO Credits from Mill / Crusher	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00
Mass Balance (MB)	3.33	1.60	0.00
Segregated (SG)	0.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00
Total	3.33	1.60	0.00

Processor and/or Trader Page 3/6

2.4 According to the volume information you have provided in Question PT.2.2 and Question PT.2.3, your company's certified palm oil, palm kernel oil and related products uptake is:

1.81%			

2.4.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake calculated in PT.2.4. This may include changes due to business environment, evolving nature of operations or variations due to stock positions

-	. 1	-
- 1	N	

2.5 What is the estimated percentage of Certified Sustainable Palm Oil in the palm oil, palm kernel oil and related products sold, traded or processed by your company in the following regions:

Percentage
100
0
0
0
0
0
0
0
0

Processor and/or Trader Page 4/6

3. TimeBound Plan

3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification or RSPO trader/distributor licence?
2021
3.2 Which year did your company start (or expect to start) to source any RSPO-certified palm oil and oil palm products?
2021
3.2.1 If the previous target year has not been met, please explain why.
NO
3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why
NO

Processor and/or Trader Page 5/6

4. Actions For Next Reporting Period

	Please outline activities that your company will take in the coming year to promote the production or assumption 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
\mathbf{M}	No activities planned
	Others
Oth	ner

Processor and/or Trader Page 6/6

Consumer Goods Manufacturers

1.	O	per	atio	onal	Pr	ofil	le

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

OLYMPIC FOODS LTD, REVLINO CY, SWITZGROUP TRADING LTD CY, KRITON ARTOS SA, IONIKI SFOLIATA SA, BORGCRAFT PTY, ARTIZAN HELLAS SA

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)	2030.78
Total volume of crude palm kernel oil (tonnes)	43.64
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	2074.42

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	6
North America	19
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	75

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)	1542.00	0.00	0.00	0.00
Segregated (SG)	181.00	3.60	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	1723.00	3.60	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:

83.23%

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.

NO

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

Countries/Regions	Percentage
Europe	2
North America	8
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	90

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?
No
3.6.3 Please explain why your company does not have such a TimeBound Plan
PRODUCTION ACCORDING TO CUSTOMERS DEMANDS

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

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?
No
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?
No
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?
Yes

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 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

Shared Responsibility Page 2/4

No

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?
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?

Shared Responsibility Page 3/4

SR 26. Promotion of certification/uptake

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?
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?
No

Shared Responsibility Page 4/4

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
NO

Challenges & Support Page 1/1