Particulars

1.1 Member	Organisation
	Name
Wells Enterp	rises, Inc.
1.2 Member	ship Number
4-0975-17-00	00-00
1.3 Member	ship Sector
Consumer Go	pods Manufacturers
1.4 Member	ship Category
Ordinary	
1.5 Country	
United States	
2.0 Does you derivatives o	or company or organisation produce, process, consume or sell any palm oil or any products containing of palm oil?
Yes	
	elect all description(s) that describe the palm oil-related activities of your company or organisation. ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s).
will be requi	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s)
■ I own and ■ I represent	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group
will be requi ☐ I own and ☐ I represent ☐ I own and	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills
	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders
il own and I represent I own and I own and I own and I trade or b	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders proker palm oil, palm kernel oil or related products - Processors and/or Traders
I own and I represent I own and I own and I trade or b I am a refin	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders oroker palm oil, palm kernel oil or related products - Processors and/or Traders ner of palm oil or palm kernel oil - Processors and/or Traders
I own and I represent I own and I own and I own and I trade or b I am a refi	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders proker palm oil, palm kernel oil or related products - Processors and/or Traders ner of palm oil or palm kernel oil - Processors and/or Traders cessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
I own and I represent I own and I own and I trade or t I am a refit I am a B2E	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders oroker palm oil, palm kernel oil or related products - Processors and/or Traders ner of palm oil or palm kernel oil - Processors and/or Traders cessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders B distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
il own and il represent il own and il own and il own and il trade or b il am a refin il am a proc il am a B2B il manufact	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders oroker palm oil, palm kernel oil or related products - Processors and/or Traders ner of palm oil or palm kernel oil - Processors and/or Traders cessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders B distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
I own and I represent I own and I own and I trade or b I am a refit I am a B2I I manufact 3rd party c	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders oroker palm oil, palm kernel oil or related products - Processors and/or Traders ner of palm oil or palm kernel oil - Processors and/or Traders cessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders ture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by
I own and I represent I own and I own and I trade or b I am a proc I am a B2B I manufact 3rd party c I retail fina	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) t a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders proker palm oil, palm kernel oil or related products - Processors and/or Traders ner of palm oil or palm kernel oil - Processors and/or Traders cessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders d distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders ture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by contractors - Consumer Goods Manufacturers
I own and I represent I own and I own and I trade or b I am a refit I am a B2I I manufact 3rd party c I retail fina I operate for	ections are allowed, and not limited to the primary sector of the member's RSPO membership. You ired to complete the relevant ACOP section based on your selection(s). operate oil palm estate(s) and/or palm oil mill(s) a palm oil Independent Smallholder farmer Group operate independent palm oil mills operate independent palm kernel crushing plants - Processors and/or Traders proker palm oil, palm kernel oil or related products - Processors and/or Traders ner of palm oil or palm kernel oil - Processors and/or Traders cessor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders ture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by ontractors - Consumer Goods Manufacturers all consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers

Particulars Page 1/1

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
✓ 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

Wells Enterprises, Inc.
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?
2.111 In which murkets does your company sen goods with paint on and on paint products.
North America
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)	2103.92
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)	691.75
Total	2795.67

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	80
Palm kernel oil-based derivatives and fractions	20

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)	1769.82	0.00	0.00	64.59
Segregated (SG)	0.00	0.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	1769.82	0.00	0.00	64.59

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	80
Certified Palm kernel oil-based derivatives and fractions	20

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:

65.62%

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.

We've made changes to some of our portfolios and customers, resulting in some of the changes you see related to materials. The overall volume of palm-related material purchased has remained relatively constant.

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

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
2018
3.2.1 If the previous target year has not been met, please explain why.
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.
2030
3.3.1 If the previous target year has not been met, please explain why.
WEI is converting products over to RSPO-certified materials on the basis of customer requirements. That said, there is no plan for 100% conversion at this time. Our timeline will be determined by our customers.
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.
2030
3.4.1 If the previous target year has not been met, please explain why.
WEI is converting products over to RSPO-certified materials on the basis of customer requirements. That said, there is no plan for 100% conversion at this time. Our timeline will be determined by our customers.
3.6.3 Please explain why your company does not have such a TimeBound Plan
WEI is converting products over to RSPO-certified materials on the basis of customer requirements. That said, there is no plan for 100% conversion at this time. Our timeline will be determined by our customers.

4. Trademark Use

4.1 Does your company use of plan to use the KSFO 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 compar consumption of certified sustainable palm oil	ny will take in the coming year to promote the production or (CSPO)
Participation in RSPO Working Group or Task For	ces
Support Independent Smallholders (ISH)	
Contribute to the RSPO Smallholder Trainer Acad	emy
Financial contribution to the RSPO Smallholder Su	upport Fund
Direct investments in Smallholder Certification pro	pjects
☐ Involvement/direct investments in Jurisdictional/L	andscape approach
Direct/collective investments in conservation and i	estoration initiatives
Financial contribution to support members with Reand restoration initiatives	emediation and Compensation (RaCP) process, direct/collective investments in conservation
Allocating FTE to promote the production or consu	imption of certified sustainable oil palm products
Specific policies and action plans by the member to including target dates or broader policies that including target dates or broader policies.	promote CSPO production or consumption in the upstream or downstream supply chain, de such efforts
No activities planned	
✓ Others	
Other	
We are considering the position of our own bran marketplace.	ded products in addition to the customer branded products in the

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?
No
SR 2. Ethical Conduct
1.2 Does your organisation have a publicly-available policy covering Ethical Conduct, including for recruitment and contractors?
No
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?
No

Shared Responsibility Page 1/4

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?
No
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?

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?
No
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?
No
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

No

SR 26. Promotion of certification/uptake

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? 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?

Shared Responsibility Page 4/4

Challenges and Support

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 business partners or consumers on the use of CSPO Engagement with government agencies
Engagement with government agencies
Engagement with government agencies Engagement with peers and clients
 Engagement with government agencies Engagement with peers and clients Promotion of CSPO through off product claims
 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
 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
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
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
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
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

Challenges & Support Page 1/1