

Particulars

About Your Organisation

1.1 Name of your organisation

Bhatt Holdings Inc.

1.2 What is/are the primary activity(ies) or product(s) of your organisation?

- Palm Oil Grower
- Processor and/or Trader
- Consumer Goods Manufacturer
- Retailer
- Bank and/or Investor
- Social and/or Development NGO
- Environmental and/or Conservation NGO
- Affiliate

1.3 Membership number

2-1045-19-000-00

1.4 Membership category

Palm Oil Processors and/or Traders

1.5 Membership sector

Ordinary

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
 Food and Non-Food Ingredients Producer
 Power, Energy and Biofuel Processor
 Animal Feed Producer
 Oleochemicals Producer
 Distribution & Logistics
 Other

Other

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2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2 - Palm Oil and Certified Sustainable Palm Oil Sourcing is a mandatory declaration in your ACOP. This includes volume data on palm oil and palm oil products consumed, to enable the RSPO to accurately calculate uptake on a member, sector and total level. ACOP reports without reported volume data will be considered incomplete and will not be accepted.

2.1 Please include details of all operations using palm oil, owned and/or managed by the member and/or all entities that belong to the group.

Natu'oil Services Inc (Canada), Olera Ingredients & Distributions Inc, CANADA, Global Agri-Trade (USA) conduct trading and distribution of products in North America.

2.1.1 In which countries does your company sell goods with palm oil and palm oil products?

Canada ,United States

2.2 Total volume of all palm oil and palm oil products sourced in the year:

Description	Tonnes
Crude palm oil, including derivatives refined from CPO (tonnes)	185225.04
Crude palm kernel oil, including derivatives refined from CPKO (tonnes)	509.89
Crude palm kernel expeller (tonnes)	0.0
Total	185734.93

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

Description	Crude Palm Oil (CPO) and CSPO Derivatives	Crude Palm Kernel Oil (CSPKO) and CSPKO Derivatives	Palm Kernel Expeller (CSPKE)
RSPO Credits from Mill / Crusher	0.0	0.0	0.0
RSPO Credits from Independent Smallholder	0.0	0.0	0.0
Mass Balance (MB)	3051.07	148.09	0.0
Segregated (SG)	12634.75	0.0	0.0
Identity Preserved (IP)	0.0	0.0	0.0
Total	15685.82	148.09	0.0

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 and palm oil products uptake is:

8.53%

2.5 What is the estimated percentage of Certified Sustainable Palm Oil in the palm oil and palm oil products sold by your company in the following regions:

Countries/Regions	Percentage
Europe	0.0
North America	8.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	0.0
Rest of World	0.0

3. TimeBound Plan

3.1 Which year did your company achieve/obtain (or expects to achieve/obtain) the RSPO supply chain certification or RSPO trader/distributor licence?

2012

3.2 Which year did your company start (or expect to start) to source any RSPO-certified palm oil and oil palm products?

2012

3.2.1 If the previous target year for PT.3.2 has not been met, please explain why.

Target year has been met.

3.3 Which year did your company achieve (or expects to achieve) 100% RSPO certification of all palm product processing facilities.

2022

3.3.1 If the previous target year for PT.3.3 has not been met, please explain why.

Not applicable

3.4 Which year did your company begin (or expects to begin) sourcing only 100% RSPO-certified palm oil and oil palm products.

2022

3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member sells goods with palm oil or palm oil products, please explain why

All countries declared in the Time Bound Plans are covered.

3.6 How does your company proactively promote RSPO and RSPO-certified sustainable palm oil and oil palm products to your customers?

Bhatt Holdings promotes the RSPO and RSPO certified sustainable palm oil by directly offering information and education to food and cosmetic manufacturers, distributors, and consumers. We raise awareness of the benefit and necessity of CSPO and provide support to our clients marketing teams, purchasers, and technical staff. We present at local and international tradeshows and table top events engaging the public and industry professionals encouraging dialogue and questions about RSPO and RSPO certified sustainable palm oil. We present the Palm Oil Seminar Series, where we invite industry, educational organizations, and government to learn about palm oil market factors, nutrition, applications, and sustainability. Our website <http://www.olera.com/> has information & links to RSPO.

4. Actions For Next Reporting Period

4.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

Bhatt Holdings will be meeting with bakery, food manufacturing, and soap making sectors providing information and education about the benefits of CSPO, product availability, and the supply chain. We will share strategies to promote CSPO in their products to retailers and distributors further down the supply chain. We will be partnering with retailers to assist them to achieve their sustainability goals with regards to palm oil by providing CSPO information, education and solutions for their suppliers. This approach along with web based communication, participation in industry trade shows, conventions and table top events we will share information and promote sustainable palm oil to the broadest possible audience.

5. Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO) approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to <https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules> or email the ACOP team at acop@rspo.org

Labour & Labour Rights

5.1 Does your company have a publicly-available policy covering Labour & Labour Rights?

Yes

5.1.1 Does the policy cover:

- No discrimination
- Wage and working conditions
- Freedom of association
- No child labour
- No harassment
- No forced or trafficked labour

5.1.2 Has your company previously uploaded or linked its Labour & Labour Rights policy in previous ACOP reporting cycles?

Yes

Ethical Conduct & Human Rights

5.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?

No

Land Use

5.3 Does your company have a publicly-available Policy covering Land Use?

No

Occupational Health & Safety

5.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?

No

Climate Change & Greenhouse Gas (GHG)

5.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?

No

Complaints & Grievances

5.6 Does your company have a Complaints & Grievances Mechanism?

Yes

5.6.1 Is your Complaints & Grievances mechanism in line with the RSPO's grievance mechanism? For details of the RSPO's grievance mechanism, please go to <https://askrspo.force.com/Complaint/s/>

Yes

Smallholders

5.7 Does your company support oil palm independent smallholder groups?

No

5.7.3 Do you have any future plans to support oil palm Independent Smallholders?

No

5.7.4 Please explain why you are not planning to support oil palm independent smallholders

Small holders may not have the production capacity.

6. Challenges

6.1 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

Economic Challenge & Mitigation: Market concern about potential for increased costs and bureaucracy. Bhatt Holdings works to provide CSPO products that can compete with similar products from the conventional supply chain. We provide education and guidance to companies looking to source CSPO. Communication Challenge & Mitigation: Education on what Certified Sustainable means. Market is unsure what CSPO is, who RSPO is, and how RSPO is working towards achieving its mandate. Bhatt Holdings worked to communicate the issues surrounding palm oil production, to provide clear guidance about CSPO, RSPO, and how the supply chain can be accessed.

6.2 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?

- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- 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

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6.3 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