

## Particulars

### About Your Organisation

#### 1.1 Name of your organisation

Counter Brand, LLC.

---

#### 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

9-3508-20-000-00

---

#### 1.4 Membership category

Supply Chain Associate

---

#### 1.5 Membership sector

Associate

---

## Retailers

### 1. Operational Profile

#### 1.1 Please state your company's main activity within the palm oil supply chain

- Retail - with own brand products  
 Retail - without own brand products  
 Food service providers  
 Retail wholesalers  
 Other

Other

-

### 2. Palm Oil and Certified Sustainable Palm Oil Consumption

*Information in Section 2 - Palm Oil and Certified Sustainable Palm Oil Consumption - 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 list down all operations and subsidiaries using palm oil that are owned and/or managed by the member, including those under Group Membership

-

#### 2.1.1 In which markets does your company retail goods with palm oil and oil palm products?

United States

#### 2.2.5 Total volume of all palm oil and palm oil products (palm-content only) used in your company's own-brand products in the year:

Description	Tonnes
Total volume of crude/refined palm oil (tonnes)	0.0
Total volume of crude/refined palm kernel oil (tonnes)	0.0
Total volume of palm kernel expeller (tonnes)	0.0
Total volume of palm oil/palm kernel oil derivatives and fractions (tonnes)	102.7
Total	102.7

2.2.0 Please estimate the percentage of derivatives and fractions (reported in Question RT.2.2.4) 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	80.0
Palm kernel oil-based derivatives and fractions	20.0

2.3 Volume of RSPO-certified palm oil and oil palm products (palm-content only) used in your company's own brand products in the year (tonnes):

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	0.0	0.0	0.0	0.0
RSPO Credits from Independent Smallholder	0.0	0.0	0.0	0.0
Mass Balance (MB)	0.0	0.0	0.0	30.11
Segregated (SG)	0.0	0.0	0.0	0.0
Identity Preserved (IP)	0.0	0.0	0.0	0.0
Total	0.0	0.0	0.0	30.11

2.3.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question RT.2.3) 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 derivatives.

Description	Percentage
Certified Palm oil-based derivatives and fractions	80.0
Certified Palm kernel oil-based derivatives and fractions	20.0

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

29.32%

2.4.1 If your company has not reached 100% usage of sustainable palm oil through the four supply chain models (RSPO Credits, MB, SG or IP), do you have any plans to cover the gap using RSPO Credits?

Yes

2.3 Please estimate the regional distribution of your company's RSPO certified palm oil and palm oil-products usage (as declared in Question R1.2.3) in the following countries/regions:

Countries/Regions	Percentage
Europe	0.0
North America	100.0
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 begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products

2007

3.1.1 If the previous target year for RT.3.1 has not been met, please explain why.

-

3.2 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from any supply chain option in own-brand products.

2007

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

-

3.3 Which year did your company begin (or expects to begin) using 100% 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.

2007

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

-

3.4 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why

-

4. Trademark Use

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

Canada ,United States

4.2.1 Which year did your company begin (or expects to begin) using the RSPO Trademark

2020

## 5.1 Activities 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)**

• Product safety is the cornerstone of our business, so education about our raw ingredients is as important to our headquarters associates and our network of 40k independent Consultants as it is to our customers. As such, RSPO will be a critical facet of our communications around responsibly-sourced palm. • Internal education measures are already underway through our Sustainable Palm Working Group, which brings together members of our Product Development, Sustainability, Safety, Supply Chain, Regulatory, and R&D teams to coordinate our transition to using only responsibly-sourced and communicating that progress. Future internal education initiatives will include educational modules administered through our Counter University platform, Consultant fact sheets and FAQs, and webinars with members of our team. Those engagement opportunities will highlight RSPO as the leader in responsible palm sourcing and certification. • Beautycounter's approach to communicating and promoting responsibly-sourced palm to the public and other stakeholders will include an extensive media campaign across our social channels, content deployed on the Mission Hub portion of our website, and entries on the Beautycounter blog, where our partnership with RSPO will be featured as crucial to our ongoing success. Additionally, we plan to highlight RSPO as a partner during our engagement with the B Corp community, many of whom already partner with and support the organization. • Transparency is core to Beautycounter's strategy. Through our pursuit of using only responsibly-sourced palm, we seek to illuminate for all our stakeholders how the palm industry works, what its impacts are, how it could be better, and how RSPO fits into our vision for the future of clean beauty. • We aspire to achieve long-term economic viability and environmental sustainability for all the individuals and communities that help bring our products to life. That means ensuring that producers are paid fairly for their raw goods, fairly and equitably represented by all buyers and traders, and have access to assets like best practices to minimize negative environmental impacts at their farms. Our Supplier Code of Conduct requires our suppliers to comply with rigorous human and labor rights standards. Additionally, our Supplier Scorecard, currently in development, will assess suppliers based on social, environmental, and governance criteria. • We want to learn and share best practices for buyers of palm products, as well as share knowledge and best practices for consumers, so that value chains can align and rally around responsibly sourced palm and continue to drive the market. Beautycounter will continue to leverage its leadership in the beauty industry and its advocacy experience to mobilize cross-industry collaborations around advancing best practices and ensuring they are the new industry standards. • Ensuring autonomy and protection for smallholder farmers is a critical piece of our responsible sourcing platform. We prioritize growers represented by collectives and seek to ensure that all smallholders in our value chain are free from unfair top-down pressure as well as other breaches of ethical business conduct. Our internal and external communications will feature an increasing focus on telling the stories of those individuals and their communities, as a means of both raising awareness about their importance to our business and ensuring that consumers demand the same standards that we do. • Our goal is to one day use 100% RSPO in our product portfolio. But we recognize there are numerous stops on the way to realizing that objective, which is why we will prioritize continual improvement not only for our pursuit of responsibly sourced palm, but for our involvement in RSPO. Any other information that would support the application such as what your organization hopes to gain by joining the RSPO. • As we continue to grow, leveraging our market share and thought leadership in the beauty space will become more important in our efforts to shift markets, both on the consumer side and the ingredient supply side. Partnering with RSPO will allow us to build on our current momentum in this regard, as well as provide access to like-minded organizations with whom we can collaborate to advance the causes of the organization. We are seeking a partner to continually improve and grow with us, and we know that RSPO is that partner.

## of 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](mailto:acop@rspo.org)*

**Labour & Labour Rights**

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

Yes

---

**6.1.1 Does the policy cover:**

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

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

No

---

**Ethical Conduct & Human Rights**

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

Yes

---

**6.2.1 Does the policy cover:**

- Recruitment
- Contractors
- Sub-Contractors & Third-Party Contractors

**6.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACOP reporting cycles?**

No

---

**Land Use**

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

Yes

---

**6.3.1 Does the policy cover:**

- Free Prior and Informed Consent (FPIC)
- Compensation

**6.3.2 Has your company previously uploaded or linked its Land Use policy in previous ACOP reporting cycles?**

No

---



**Occupational Health & Safety**

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

Yes

6.4.1 Has your company previously uploaded or linked its Occupational Health & Safety policy in previous ACOP reporting cycles?

No

**Climate Change & Greenhouse Gas (GHG)**

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

Yes

6.5.1 Does the policy cover:

- Identification and assessment of GHG
- Public reporting of GHG footprint
- Monitored implementation plan to reduce or minimise GHG emissions

6.5.2 Has your company previously uploaded or linked its Climate Change & Greenhouse Gas policy or report in previous ACOP reporting cycles?

No

**Complaints & Grievances**

6.6 Does your company have a Complaints & Grievances Mechanism?

Yes

6.6.1 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**

6.7 Does your company support oil palm independent smallholder groups?

Yes

6.7.1 Does this support cover:

- Fair and transparent dealings with Smallholders
- Improved Smallholder livelihoods

6.7.2 How is your company supporting them?

Purchasing of smallholder credits for raw materials which are not covered under RSPO

## 7. Challenges

**7.1 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

-

**7.2 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

-

**7.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here**

chrome-extension://oemmnndcbldboiebfnladdacbfmadadm/https://downloads.ctfassets.net/ylsk4zpp53wa/5M8PE9YqQYO6wgvN4Y6vL5/b70e6b3ba235ce2d3785256832061c6d/BC\_SMR-2019-FINAL.pdf