## **Particulars**

### **About Your Organisation**

1.1 Name of your organisation
Nordex Holding A/S
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 NCO
Environmental and/or Conservation NGO
Affiliate
1.3 Membership number
4-0569-14-000-00
1.4 Membership category
Consumer Goods Manufacturers
1.5 Membership sector
Ordinary

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## **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 - 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 t calculate uptake on a member, sector and total level. ACOP reports without reported volun incomplete and will not be accepted.	the RSPO to accurately
${\bf 2.1\ Please\ list\ down\ all\ operations\ and\ subsidiaries\ using\ palm\ oil\ that\ are\ owned\ and/orincluding\ those\ under\ Group\ Membership}$	r managed by the member,
salad/white "cheese" production	
2.1.1 In which markets does your company sell goods with palm oil and oil palm produc	ts?
A = 11 = 1.1 = 11	
Applies globally	
2.2.5 Total volume of all palm oil and palm oil products (palm-content only) used in your products and in products produced by your company for third-party brands in the year:	r company's own-brand
Description	Tonnes
Total volume of crude/refined palm oil (tonnes)	3028.0
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)	0.0
Total	3028.0

2.2.6 Please estimate the percentage of derivatives and fractions (reported in Question CG.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	100.0
Palm kernel oil-based derivatives and fractions	0.0

2.3 Volume of RSPO-certified palm oil and palm oil products used in your company's own brand products and in products produced by your company for third-party brands in the year (tonnes):

Description	Crude/Refined Palm Oil (CSPO)	Palm Kernel	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	0.0
Segregated (SG)	3028.0	0.0	0.0	0.0
Identity Preserved (IP)	0.0	0.0	0.0	0.0
Total	3028.0	0.0	0.0	0.0

2.3.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question CG.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	100.0
Certified Palm kernel oil-based derivatives and fractions	0.0

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:

100.00%

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

# $2.5\ Please\ estimate\ the\ regional\ distribution\ of\ your\ company's\ RSPO\ certified\ palm\ oil\ and\ palm\ oil-products\ us\ age\ (as\ declared\ in\ Question\ CG.2.3)\ in\ the\ following\ countries/regions:$

Countries/Regions	Percentage
Europe	30.0
North America	5.0
Malaysia	1.0
Indonesia	1.0
China	1.0
India	1.0
Latin America	1.0
Africa	30.0
Rest of World	30.0

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  3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.  Target met.  3.3 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.  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the Time Bound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	3. TimeBound Plan	
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  3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.  Target met.  3.3 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.  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the Time Bound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?	
2018  3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.  Target met.  3.3 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.  2018  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	2016	
2018  3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.  Target met.  3.3 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.  2018  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?		
3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.  Target met.  3.3 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.  2018  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	3.2 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and paperoducts in own-brand products	alm oil
3.3 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.  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	2018	
3.3 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.  2018  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the Time Bound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.	
palm oil products from any supply chain option in own-brand products.  2018  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	Target met.	
palm oil products from any supply chain option in own-brand products.  2018  3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?		
3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.  Target met.  3.4 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 ownbrand products.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	$3.3 \ Which year \ did \ your \ company \ begin \ (or \ expects \ to \ begin) \ using \ 100\% \ RSPO-certified \ sustainable \ palm \ oil \ products \ from \ any \ supply \ chain \ option \ in \ own-brand \ products.$	l and
3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	2018	
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3.4 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.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?		
palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in ownbrand products.  2018  3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	Target net.	
3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.  Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?		
Target met.  3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	2018	
3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why  Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.	
Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	Target met.	
Coverd.  3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?		
3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?	${\bf 3.5}\ If\ the\ Time\ Bound\ Plan\ commitments\ declared\ above\ do\ not\ cover\ all\ countries\ in\ which\ the\ member\ oper\ please\ explain\ why$	rates,
behalf of other companies?	Coverd.	
V.	3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufacture behalf of other companies?	ed on
Yes	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?	iI

 $3.6.2\ When do you\ expect\ all\ products\ manufactured\ on\ behalf\ of\ other\ companies\ to\ only\ contain\ RSPO-certified\ sustainable\ palm\ oil\ and\ palm\ oil\ products\ ?$ 

Yes

2018.0

### 4. Trademark Use

4.1 Does your company use or plan to use the RSPO 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	
Lowusage of palm oil	
Risk of supply disruption	
Others	
Others	

### 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)

We will continue to give info to our costumers about the benifits of RSPO, will still have not any demand/wish, for the use of the RSPO trademark.

### 6. 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

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
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?
Yes
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
✓ Contractors  ✓ Sub-Contractors & Third-Party Contractors
Suo-Contractors & Trinterarty Contractors
6.2.2 Has your company previously uploaded or linked its Ethical Conduct & Human Rights policy in previous ACOF reporting cycles?
Yes
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?
Yes

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?
Yes
Climate Change & Greenhouse Gas (GHG)
6.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?
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?
No
6.7.3 Do you have any future plans to support oil palm Independent Smallholders?
6.7.4 Please explain why you are not planning to support oil palm independent smallholders
this is a new area for us, we do not buy directly for smallholders.

### 7. Challenges

7.1 W palm	/hat significant obstacles or challenges has your company encountered in the promotion of certified sustainable oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?
A	wareness of RSPO in the market
Di	fficulties in the certification process
Ce	ertification of smallholders
Co	empetition with non-RSPO members
Hi	gh costs in achieving or adhering to certification
Hı	ıman rights issues
In	sufficient demand for RSPO-certified palm oil
Lo	owusage of palm oil
Re	eputation of palm oil in the market
Re	eputation of RSPO in the market
Su	pply issues
Tı	raceability issues
✓ No	o challenges faced
Ot	hers
Others	S .
_	
visior	a addition to the actions already reported in this ACOP report, what other ways has your company supported the nof the RSPO to transform markets to make sustainable palm oil the norm?  **Register of the support of th
	agagement with government agencies
	omotion of CSPO outside of RSPO venues such as trade workshops or industry associations
	omotion of physical CSPO
	oviding funding or support for CSPO development efforts
	search & Development support
	akeholder engagement
	o actions taken
Ot	hers
Others	5
_	
7.3 If activi	your company has any other publicly-available reports or information regarding its palm oil-related policies and ties, please provide the links here
-	