



[2017]

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

**Company:** Olam

**Country:** Ivory Coast

**Commodity:** Cocoa

**Production Process:** Harvesting

**Cooperative:** CAEVA

**Assessment Locations:** Région du Haut-Sassandra, Département de Vavoua, Sous-préfecture de Vavoua.

**Monitors:** Societal Compliance Initiatives

**Assessment Dates:** 02–10 November 2017

**Number of assessed farms:** 60

**Total area covered:** 235 Ha

**Number of farmers interviewed:** 60

**Total number of workers:** 121

**Number of workers interviewed:** 38



### FLA Member/Affiliate Update

ofi ended its membership as an FLA Participating Company in January 2026. The company's reports can still be found at [Fairlabor.org](http://Fairlabor.org)

To view more about the FLA's work with Olam, please visit the FLA website [here](#).  
To access the FLA Agriculture Monitoring Benchmarks, please visit [this page](#).

## Employment Relationship

### Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In compliance	
	ER.2.1 (PR)	In Progress	All Farms
	ER.2.1.1 (PR)	In Progress	All Farms
Recruitment and Hiring	ER.3.1	Noncompliance	Farm 1
	ER.3.1.1	Noncompliance	Farm 1
	ER.3.1.2	Noncompliance	Farm 1
	ER.4	N/A	
	ER.5.1	N/A	
	ER.5.2	N/A	
	ER.5.3	Noncompliance	Farm 1,42,50
	ER.6 (PR)	Not Initiated	All Farms
	ER.7.1	In compliance	
	ER.7.2	In compliance	
	ER.7.3	In compliance	
	ER.7.4	In compliance	
	ER.7.5	In compliance	
	ER.7.6	In compliance	
	ER.7.7	In compliance	
ER.7.8	In compliance		
Terms and Conditions	ER.9.1	In compliance	
	ER.9.2		
	ER.9.2.1	Noncompliance	Farm 1,42,50
	ER.9.2.2	Noncompliance	Farm 1,42,50
	ER.9.2.3	Noncompliance	Farm 1,42,50
	ER.9.3		
	ER.9.3.1	In compliance	
	ER.9.3.2	In compliance	
	ER.9.3.3	In compliance	
	ER.10	In compliance	
	ER.11	In compliance	
	ER.12.1	Noncompliance	Farm 1, 2, 5, 6, 9, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20, 21, 23, 24, 26, 27, 28, 29, 30, 32, 33, 34, 35, 36, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 50, 51, 55, 56, 57 (43 farms)
	ER.12.1.1	In compliance	
	ER.12.2	N/A	
	ER.13.1	Noncompliance	Farm 1,2,10, 11,12,15 to 19,21,23,24,27,28,32, 33,34, 39,41,42,43,44,47,50,55,56 (27 Farms)
ER.13.2 (PR)	N/A		
ER.13.3 (PR)	N/A		
Administration	ER.15.1	In compliance	
	ER.15.2	N/A	
	ER.15.2.1	N/A	
	ER.16.1	Noncompliance	Farms 1,42,50
	ER.16.2	Noncompliance	Farms 1,42,50
	ER.17.2 (PR)	N/A	
	ER.17.3 (PR)	N/A	
	ER.17.4 (PR)	In compliance	
Worker Involvement	ER.18.1	In compliance	
	ER.18.2 (PR)	In compliance	
Right to Organize and Bargain	ER.19	In compliance	

Work Rules and Discipline	ER.20.1	In compliance	
	ER.20.2	In compliance	
	ER.20.3 (PR)	In compliance	
	ER.20.4	In compliance	
	ER.20.6	In compliance	
	ER.20.7	In compliance	
	ER.20.8	In compliance	
	ER.20.9 (PR)	N/A	
	ER.20.11	In compliance	
Training	ER.21	In compliance	
HSE Management System	ER.24.1.	Noncompliance	Farm 1, 2, 5, 6, 9, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20, 21, 23, 24, 26, 27, 28, 29, 30, 32, 33, 34, 35, 36, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 50, 51, 55, 56, 57 (43 farms)
	ER.24.2 (PR)	In compliance	
	ER.24.3	In compliance	
	ER.24.4 (PR)		
	ER.24.4.1 (PR)	In compliance	
	ER.24.4.2 (PR)	In compliance	
	ER.24.4.3 (PR)	In compliance	
	ER.24.4.4 (PR)	In compliance	
	ER.24.4.5 (PR)	Not Initiated	All Farms
	ER.24.4.6 (PR)	In compliance	
ER.24.5 (PR)	In compliance		
Grievance Procedures	ER.25.1 (PR)	Not Initiated	All Farms
	ER.25.2 (PR)	Not Initiated	All Farms
	ER.25.3	Noncompliance	All Farms
	ER.25.4	Noncompliance	All Farms

### Employment Relationship Assessment Summary

Recruitment and Hiring / Proof of Age Documentation	
<p><b>Benchmarks:</b></p> <p><b>ER.3.1:</b> Employers shall verify proof of age documentation for all young workers in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers.</p> <p><b>ER.3.1.1:</b> Employers shall take reasonable measures to ensure such documentation is complete and accurate.</p> <p><b>ER.3.1.2:</b> In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.</p> <p><b>ER.5.3:</b> Workers shall not be engaged to work in a farm by a family member, friend, or associate in order for that family member, friend or associate to receive continuing remuneration, consideration, or any other return from the employer. This prohibition does not refer to normal references, referral bonuses or standard employment recruitment practices.</p>	<p><b>Noncompliance in 1 farm</b></p> <p><b>in 3 farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>On the assessed farms, farmers do not check and collect any documentation of the age of any workers they recruit. For example, the monitors identified on one of the farms, a worker whose physical appearance suggests about 14 years. The farmer who employs this worker gives him the age of 18 years. No proof of age documentation is available at the farmer level to clarify the situation. Like this farmer, all the others reported that they do not verify or archive evidence of the age of the workers they recruit. No mechanism is tested by the cooperative to fill this gap of farmers who operate in the informal sector.</p> <p>In addition, the monitors received the testimonies of three farmers who reported that they pay the wage of their workers to their family who stayed in their origin country (Burkina Faso). These testimonies were confirmed by two of the concerned workers. That is a violation of wage and compensation requirement.</p>	

	Source: Observation, Interviews	
<b>Company Action Plan:</b>	<p>Olam will continue to sensitize all its suppliers on the importance for their members to ensure that the workers they employ are, at least, the minimum working age. For this purpose, Olam will sensitize its suppliers to engage their members avoid hiring any person whose age could not be established with evidence and collect and maintain age documentation for each hired young worker.</p> <p>Olam and its customers support the training and sensitization of the farmers who are participating in their different sustainability programs in force. These trainings and sensitizations already include awareness on force labor. However, Olam will encourage its suppliers to include a specific topic on wage payment to the worker and focus on it, so that all farmers and workers know that the wage should be paid directly to the worker who is free to dispose of his payment.</p>	
<b>Deadline Date:</b>	December 2019	
<b>Terms and Conditions</b>		
<b>Benchmarks:</b> <i>ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</i> <i>ER.9.2.1: provisions of national laws;</i> <i>ER.9.2.2: Freely negotiated and valid collective bargaining agreements; or</i> <i>ER.9.2.3: the FLA Workplace Code.</i>		<b>Noncompliance in 3 farms</b>
<i>ER.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.</i>		<b>in 43 farms</b>
<i>ER.13.1: Farmer, sharecropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.</i>		<b>in 27 farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>In general, farms workers seem to have all agreed the conditions of their employment. However, some of these conditions, such as the payment of the worker's income to a third person, and the payment of the worker's income away from the workplace in another country, practiced in three of the visited farms, fall below the national legislation and requirements of existing codes of conduct.</p> <p>In addition, the majority of workers (35 out of 38 surveyed) are not aware of their rights and the workplace standards, mainly health and safety.</p> <p>Finally, the wide majority of the farmers themselves are not aware of local laws and the elements of the codes of conduct in force, as more than 71% of the evaluated sample (43 out of 60 farmers) do not participate in training sessions; while 27 of them directly supervise workers.</p> <p>Source: Interviews, Observation, Record review</p>	
<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>Olam will assist the cooperative to raise awareness on workers' wage payment. This awareness will be extended to all cooperatives in the supply chain through the farmers' field school so that all the producers not paying their workers directly will stop this practice.</li> <li>Every year, the cooperative organizes 10 field school sessions through which producers and workers are trained on good agricultural practices and the principles of health, safety and the environment. With the support of Olam, the cooperative will raise the awareness of the producers so that they give the possibility to their workers or encourage their workers to participate in the farmers' field school sessions.</li> </ul>	

	<ul style="list-style-type: none"> <li>• With Olam's support, the cooperative will conduct workers' training on occupational health and safety and worker rights.</li> <li>• The cooperative will encourage producers to participate in farmers' farm schools as well</li> <li>• In order to better train producers and workers on good farming practices, Olam has implemented the close coaching method which also allows the development of social terms such as health and safety at work and child labor during the restitution in the farmers' farm school.</li> <li>• For the 2018/2019 campaign, Olam will distribute to each producer and worker a leaflet of its Olam Code of Conduct which contains national and international health and safety and environmental requirements.</li> </ul>
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<b>Deadline Date:</b>	December 2019
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### Free Disposal of Wages

<p><b>Benchmarks:</b></p> <p><i>ER.16.1: Employers may not limit in any manner the freedom of workers to dispose of their wages.</i></p> <p><i>ER.16.2: Wages must be paid on regular working days and in principle at or near the workplace. Workers must be free from any coercion to make use of enterprise or works stores.</i></p>	<b>Noncompliance in 3 farms</b>
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<b>Findings/Noncompliance Explanation:</b>	<p>During the assessment, three farmers reported that they keep the income of their workers for the duration of their contract, from two to three years, before returning it to their parents in their origin country (Burkina Faso). Even if two of the concerned workers acknowledge having given their prior consent, this practice constitutes a barrier to their freedom to dispose of their income directly.</p> <p><u>Source:</u> Interviews</p>
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<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>• With the support of Olam, the cooperative will ask the producers to stop this practice and directly pay the wages of the workers. Also,</li> <li>• The cooperative will sensitize all its producers on the consequences of this practice that could be assimilated to forced labor.</li> <li>• Olam will also work with the cooperative to provide to the internal monitoring staff, a mechanism of control that focuses on payment practices to be used during their inspections.</li> <li>• Olam will ensure that focus continues to be put on forced labor and child labor awareness arising in all cooperatives participating in its supply chain.</li> </ul>
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<b>Deadline Date:</b>	December 2019
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### HSE Management System

<p><b>Benchmarks:</b></p> <p><i>ER.24.1: Health, safety and environmental rules shall be communicated to all workers in the local language or language spoken by workers if different from the local language.</i></p>	<b>Noncompliance in 43 farms</b>
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<b>Findings/Noncompliance Explanation:</b>	<p>Monitors note that to communicate the health, safety and environment requirements, Olam has published illustrated flyers and posters in French, to facilitate the access to information to all. In addition, the cooperative organizes training sessions for farmers and workers.</p> <p>However, more than 71% (43 out of 60) of the interviewed farmers and 92% (35 out of 38) of workers did not have access to these policies and procedures, either because they do not participate in training, or because they did not receive or are not exposed to the communication tools.</p>
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	<p><u>Source:</u> Interviews, Record review</p> <p>Every year, the cooperative organizes 10 farmers’ farm school sessions through which producers and workers are trained on good agricultural practices and the principles of health, safety and the environment. In addition to this,</p> <ul style="list-style-type: none"> <li>• Olam will support the cooperative to raise the awareness of the producers so that they allow and encourage their workers to participate in the farmers’ field school sessions.</li> <li>• Olam will support the cooperative to conduct workers’ training on occupational health and safety and worker rights.</li> <li>• Olam will engage the cooperative to encourage producers to participate in farmers’ field school as well.</li> <li>• In order to better train producers and workers on good farming practices, Olam has implemented the close coaching method which also allows the development of social terms such as health and safety at work and child labor during the restitution in the farmers’ field school.</li> <li>• The coaches will ensure that all workers and producers take part of the training sessions.</li> </ul>
<b>Deadline Date:</b>	December 2019
<b>Grievance Procedures</b>	
<p><b>Benchmarks:</b></p> <p><i>ER.25.3: FLA-affiliated companies shall make sure that a confidential non-compliance reporting mechanism is available for farmers and workers in the supply chain (such as members of cooperatives or suppliers of seed organizers). Through this channel, any code violation can be communicated to the company if the local and farm level grievance redress mechanisms fail to sufficiently address the issue.</i></p> <p><i>ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service providers and suppliers.</i></p>	
	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>On its code of conduct flyer distributed to farmers, Olam mentioned a toll-free number from which interested parties can reach them to report confidentially, any situation of non-compliance and grievance. However, this information is not explained to farmers and workers. So, they are not aware of the procedure.</p> <p><u>Source :</u> Interviews, phone test</p>
<b>Company Action Plan:</b>	<p>Olam has implemented a toll-free number mentioned on all its Code of Conduct flyers distributed last year to producers and workers in its supply chain.</p> <p>Since it was set up, the management of the Olam hotline has been under the control of the Community Development Officer in charge of child labor issues. This year, Olam has recorded: 5 calls from farmer trainer reporting non-payment of salaries. 1 cooperative supplier member denounced the discrimination at the supplier level regarding the free distribution of fertilizer and 1 cooperative laborer denounced the involvement of children in some hazardous tasks.</p> <p>However, through the farmers’ field school, Olam will continue to explain to workers and producers the instructions to use the hotline.</p>
<b>Deadline Date:</b>	December 2019

**Harassment or Abuse**

**Compliance Status**

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	In compliance	
	H/A.1.2	In compliance	
Discipline	H/A.2	In compliance	
	H/A.3	In compliance	
	H/A.4	In compliance	
	H/A.5	In compliance	
	H/A.6	In compliance	
	H/A.7	In compliance	
	H/A.13	In compliance	
Violence	H/A.8.1	Risk of Noncompliance	Farm 1
	H/A.8.2	In compliance	
	H/A.8.3	In compliance	
Sexual Harassment	H/A.9.1	In compliance	
	H/A.9.2	In compliance	
	H/A.9.3	In compliance	
	H/A.9.4	In compliance	
Security Practices	H/A.10	N/A	
	H/A.10.1	In compliance	
	H/A.10.2	N/A	

### Harassment or Abuse Assessment Summary

Violence	
<p><b>Benchmarks:</b></p> <p><i>H/A.8.1: Employers shall ensure that the workplace is free from any type of violence, harassment or abuse, be it physical, sexual, psychological, verbal, or otherwise. This also applies to workers who are brought to the farm by employers, labor contractors or service providers.</i></p>	<p><b>Risk of Noncompliance in 1 farm</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>During the assessment, monitors observed a foreign worker visibly below the minimum age of employment. He was forced by his employer not to answer the questions of the monitors. Therefore, the monitors believe that this worker whose right of speech is confiscated could undergo other forms of violence or harassment that they could not reveal.</p> <p><u>Source</u> : Observation, Interview</p>	
<p><b>Company Action Plan :</b></p>	<p>To build the awareness of the farmers participating in its supply chain on labor standards, Olam collaborates closely with its cooperative partners to organize training sessions, sensitizations and distribute leaflets covering FLA's code of conduct, including harassment or abuse. For the 2018/2019 cocoa campaign, these efforts will be strengthened in all the cooperatives with new initiatives consisting in visiting individual farmers for coaching and face-to-face sensitizations. Regarding this specific finding, the Regional Representative of Olam in charge of this sector and the cooperative's representative will meet with the farmer for intensive sensitization on labor standards requirement, mainly, harassment or abuse, forced labor and child labor. More specifically, the cooperative will sensitize the farmer on the importance to ensure that the workers he employs are, at least, the minimum age for employment according to local laws. The cooperative will engage the farmer to commit to avoid hiring any person whose age could not be established with evidence and collect and maintain age documentation for each hired young worker.</p>
<p><b>Deadline Date :</b></p>	<p>December 2019</p>

## Forced Labor

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	Noncompliance	Farm 1
Freedom in employment and movement	F.2	Risk of Noncompliance	Farm 1
	F.3	In compliance	
	F.4.1	N/A	
	F.4.2	In compliance	
	F.5.3	In compliance	
	F.7.1	In compliance	
	F.7.2	In compliance	
	F.7.3	In compliance	
	F.7.4	In compliance	
	F.7.5	In compliance	
	F.7.6	In compliance	
	F.7.7	In compliance	
	F.8	In compliance	
Work of Family Members	F.6.1	In compliance	
	F.6.2	In compliance	
	F.6.3	In compliance	
	F.6.4	In compliance	
Personal Workers Identification and Other Documents	F.9	In compliance	

### General Compliance / Freedom in Employment and Movement

**Benchmarks:**

*F.1: Employers shall comply with all national laws, regulations and procedures concerning the prohibition of forced labor and human trafficking in any stage of the agriculture production process.*

**Noncompliance  
in 1 farm**

**Benchmarks:**

*F.2: All workers shall have the right to enter into and to terminate their employment freely.*

**Risk of  
Noncompliance  
in 1 farm**

**Findings/Noncompliance  
Explanation:**

During their farms visits, the monitors identified a worker who was recruited by the farmer in his country of origin (Burkina Faso). This worker did not have the right to speak with monitors in the presence of his employer and could not, therefore explain his conditions of employment. However, according to the farmer's own explanations, the conditions of employment of this worker were discussed directly with his parents who are in their origin country.

According to the farmer, he will work for three years before he can return to his country. His salary will be paid only after three years, directly to his parents when they will go back to their country. In conclusion, the monitors believe that this situation shows clear violations of forced labor requirements.

Source: Interview, observation

**Company Action Plan:**

To build the awareness of the farmers participating in its supply chain on labor standards, Olam collaborates closely with its cooperatives partners to organize training sessions, sensitizations and distribute leaflets covering FLA's code of conduct, including harassment or abuse. For the 2018/2019 cocoa campaign, these efforts will be strengthened in all the cooperatives with new initiatives consisting in visiting

	individual farmers for coaching and face-to-face sensitizations. Regarding this specific finding, the Regional Representative of Olam in charge of this sector and the cooperative's representative will meet with the farmer for intensive sensitization on labor standards requirement, mainly, harassment or abuse, force labor and child labor. More specifically, the cooperative will sensitize the farmer on the importance to ensure that the workers he employs are, at least, the minimum age for employment according to local laws. The cooperative will engage the farmer to commit to avoid hiring any person whose age could not be established with evidence and collect and maintain age documentation for each hired young worker.
<b>Deadline Date:</b>	December 2019

## Child Labor

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	Farms 1, 6, 14, 35
Minimum Age	CL.2	Noncompliance	Farm 1
Immediate Family Members	CL.3	Noncompliance	Farm 6, 14, 35
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	In compliance	
	CL.6.1	In compliance	
	CL.6.2	Risk of Noncompliance	All Farms
	CL.7	Noncompliance	Farm 1, 6, 14, 35
Apprenticeships and Vocational Training	CL.8.1 (PR)	In compliance	
	CL.8.2 (PR)	N/A	
Children on Premises	CL.9	Noncompliance	Farm 6
Removal and Rehabilitation of Child Laborers	CL.10.1	Noncompliance	All Farm
	CL.10.2 (PR)	In Progress	All Farms

### Child Labor Assessment Summary

General Compliance / Immediate Family Members / Minimum Age	
<b>Benchmarks:</b>	<b>Noncompliance in 4 farms</b>
<i>CL.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.</i>	
<i>CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to progressively raise the minimum age to 15 years.</i>	
<i>CL.3: In accordance with national laws and ILO Convention 138, children of producers not younger than 12 years may be involved in light work on their parents' farm provided that:</i>	<b>in 3 farms</b>
<ul style="list-style-type: none"> <li>• The work is not dangerous and not harmful to their health or development;</li> <li>• The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays</li> <li>• The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral or physical development;</li> <li>• The child's parents provide supervision and guidance.</li> </ul>	
<b>Findings/Noncompliance Explanation:</b>	During the assessment, monitors identified a contract worker who was presented by his employer as 18 years old. This farmer has forbidden the worker to talk with

	<p>monitors. However, with regard to his physical appearance, the monitors believe that his age might be around 14 years. In the absence of a document of identification and without testimony of the worker himself, the monitors trust their judgment and conclude that the farmer hired a worker whose age is below the legal minimum of employment which is 16 years old in Côte d'Ivoire.</p> <p>In addition, because of his involvement in all tasks on the farm, he is exposed to hazardous works for his age and prohibited by the legislation in force. This is also the case for nine other children between 13 and 16 years old and five young workers between 16 and 18 years old who work in the family context. They are involved in hazardous works such as clearing, harvesting and agrochemical treatment, according to testimonies from their parents. Indeed, the monitors observed one of these young family workers, aged 16, applying herbicide on his father's farm.</p> <p><u>Source:</u> Interview, Observations</p>
<p><b>Company Action Plan:</b></p>	<p>To build the awareness of the farmers participating in its supply chain on labor standards, Olam collaborates closely with its cooperative partners to organize training sessions, sensitizations and distribute leaflets covering FLA's code of conduct, including harassment or abuse. For the 2018/2019 cocoa campaign, these efforts will be strengthened in all the cooperatives with new initiatives consisting in visiting individual farmers for coaching and face-to-face sensitizations. Regarding this specific finding, the Regional Representative of Olam in charge of this sector and the cooperative's representative will meet with the farmer for intensive sensitization on labor standards requirement, mainly, harassment or abuse, forced labor and child labor. More specifically, the cooperative will sensitize the farmer on the importance to ensure that the workers he employs are, at least, the minimum age for employment according to local laws. The cooperative will engage the farmer to commit to avoid hiring any person whose age could not be established with evidence and collect and maintain age documentation for each hired young worker</p> <p>In addition, for this campaign 2018/2019, Olam is working with its business partners to intensify its child labor monitoring and remediation system in force in its cocoa supply chain in Côte d'Ivoire by ensuring its effective functioning and its extension to all cooperatives participating in the supply chain.</p> <p>For this purpose, we have partnered with FLA to conduct CLMRS capacity building sessions for all the group administrators and build the awareness of the managers of the cooperatives involved in its supply chain, to increase their involvement in the overall effort to address the child labor issue.</p> <p>Going forward, the households profiling and the internal inspections at farm level will be intensified in all our partner cooperatives and findings will be deeply analyzed in order to provide sustainable remediation for proved cases and prevent potential risks of child labor.</p> <p>With regard to this specific finding, Olam will engage the cooperative to deeply assess the situation. In case it is established that the worker has legal hiring age, then the farmer could continue working with him given the fact that he will be sensitized on child labor requirements, mainly hazardous tasks for young workers. On the contrary, or if the age cannot be clearly established, the cooperative will engage the farmer to stop all working relations with him and return him back to his family.</p>
<p><b>Deadline Date:</b></p>	<p>December 2019</p>
<p><b>Young Workers</b></p>	

<b>Benchmarks:</b> <i>CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.</i>		<b>Risk of Noncompliance in all farms</b>
<i>CL.7: No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Such work includes, but is not limited to, the application of agricultural chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights. Every activity performed by a young worker must be supervised by an adult.</i>		<b>Noncompliance in 4 farm</b>
<b>Findings/Noncompliance Explanation:</b>	<p>Interviewed farmers operate in informal family farms and work primarily with their family members. In general, they are illiterate. Therefore, they do not keep any list of young workers they may hire and that can provide details on the employment of these young people. No mechanism is currently planned to assist them in this framework.</p> <p>In addition, some farmers, particularly on four farms, mentioned during the interviews that they associate some of their children under 18 years old in their production activities. Some of these activities including weeding, agrochemical treatment and harvesting, are classified as hazardous works by national and international legislation, that may be harmful to their health. Monitors observed some children performing these activities.</p> <p><u>Source:</u> Interview, Observations</p>	
<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>• See CL 1, 2 &amp; 3</li> </ul> <p>In addition, during the farmers' and workers' sensitization and training sessions, focus will be put on specifics benchmarks of child labor, such as keeping of proof of age documentation for young workers, hazardous tasks for young workers. For this purpose, the list of light work authorized for children and hazardous work prohibited will be widely communicated.</p>	
<b>Deadline Date:</b>	December 2019	
<b>Children on Premises</b>		
<b>Benchmarks:</b> <i>CL.9: The employer shall ensure that children (including those residing on the farm and those of migrant workers) are not exposed to dangerous agriculture production activities, including exposure to chemicals/pesticides.</i>		<b>Noncompliance in 1 farm</b>
<b>Findings/Noncompliance Explanation:</b>	<p>On one of the assessed farms, monitors observed a farmer who carried out the agrochemical treatment of his farm by himself in the presence of his two children, aged 5 and 7, according to him. These children were not associated with the production work of the farmer, but the chemical used, generally toxic, present risks of intoxication for them.</p> <p><u>Source :</u> Observations</p>	
<b>Company Action Plan :</b>	<ul style="list-style-type: none"> <li>• See CL 1, 2 &amp; 3</li> </ul> <p>Also, during the coaching sessions, the coaches will focus on the fact that farmers and workers should avoid exposing children to dangerous production activities such as chemical application, as revealed by this finding.</p> <p>Moreover, farms inspectors will deserve special attention to such practices to definitely ensure that such practices never occur again in farms.</p>	
<b>Deadline Date :</b>	December 2019	
<b>Removal and Rehabilitation of Child Laborers</b>		
<b>Benchmarks:</b>		<b>Noncompliance</b>

<b>CL.10.1:</b> <i>If a child laborer is found working on a farm, all relevant downstream suppliers, including the participating company, shall immediately assess the situation at the child's household level and shall engage with relevant stakeholders to find a sustainable remediation solution that is in the best interest of the child.</i>		<b>in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>Even if according to the staff of the Cooperative's Internal Monitoring System, no working child has ever been identified on the farms belonging to the cooperative, monitors nevertheless noted violations of child labor requirements and identified a formal case of a child worker. In spite of this, they note the lack, in all the visited farms, of a functional child labor monitoring and remediation system, equipped with a framework for removal and rehabilitation of children facing abuse.</p> <p>In this framework, the cooperative has set up child labor monitoring committees involving volunteers in each section of the cooperative. But in practice, these committees are not yet functional and do not provide for any mechanism for the removal and rehabilitation of child workers. In addition, no documentation was provided to prove the functioning of these committees.</p> <p><u>Source:</u> Interviews, Record review, Observations</p>	
<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>• For the campaign 2018/2019, Olam will intensify the actions of CLMRS installed at each cooperative level by ensuring their functioning. This will allow CLMRS to be more active in profiling producer households and farm inspection visits to identify all cases of child laborers in plantations.</li> <li>• Olam will also increase proximity awareness of producers on child labor and health and security through its revised image box.</li> </ul> <p>Olam has design a new CLMRS procedure to guide the monitoring and the remediation actions. This procedure is being distributed to all cooperative in supply chain through the MoU signed at the beginning of the campaign. These remediation actions encompass women empowerment activities like VSLA, IGR as well as school and health center construction.</p>	
<b>Deadline Date:</b>	December 2019	

## Health, Safety and Environment

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	Farms 1,5,6,9,43,52
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In Progress	All Farms
	HSE.3.1	N/A	
	HSE.4 (PR)	N/A	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	N/A	
	HSE.5.2	Noncompliance	All Farms
Safety Equipment and First Aid	HSE.6.1 (PR)	In Progress	All Farms
	HSE.6.2 (PR)	Not Initiated	All Farms
	HSE.16.3 (PR)	In Progress	All Farms
Personal Protective Equipment	HSE.7 (PR)	In Progress	All Farms
	HSE.8	In compliance	

Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	In compliance	
	HSE.9.2.1	In compliance	
	HSE.10	Noncompliance	Farms 6, 9, 52
	HSE.11.1	Noncompliance	Farms 1, 6
	HSE.11.2 (PR)	In compliance	
Protection Reproductive Health	HSE.12.1	In compliance	
	HSE.12.2 (PR)	In compliance	
Infrastructure	HSE.13 (PR)	N/A	
	HSE.17.1	In compliance	
	HSE.17.2 (PR)	N/A	
	HSE.19 (PR)	In compliance	
	HSE.21 (PR)	In compliance	
	HSE.22 (PR)	N/A	
Machinery Safety	HSE.14.1	In compliance	
	HSE.14.2	Noncompliance	Farms 6, 9, 52
	HSE.14.3	N/A	
	HSE.14.4	In compliance	
Ergonomics and Medical Facilities	HSE.15.2 (PR)	In compliance	
	HSE.16.2	In compliance	

### HSE Assessment Summary

General Compliance / Chemical Management / Machinery Safety	
<p><b>Benchmarks:</b></p> <p><i>HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.</i></p>	<b>Noncompliance in 6 farms</b>
<p><i>HSE.10: Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.</i></p> <p><i>HSE.14.2: Where appropriate, workers shall receive training in the proper use and safe operation of machinery, tractors, equipment and tools they use.</i></p>	<b>Noncompliance in 3 farms</b>
<p><i>HSE.11.1: To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriate accommodations shall be made for pregnant women and workers under the age of 18, as required by applicable laws or the provisions of the FLA Workplace Code, in a manner that does not unreasonably disadvantage workers.</i></p>	<b>Noncompliance in 2 farms</b>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>During the assessment, the monitors noted various evidence that indicate violations of existing health, safety and environment laws and codes of conduct.</p> <p>On two of the visited farms, the farmers poorly manage the empty packaging of agrochemical products that they use on their farms. In addition, three farmers testified that they perform the agrochemical treatment of their farms with the help of their workers and some members of their families without adequate equipment or training. On one of the farms, the monitors observed a child of the farmer, aged 16-years-old, who was applying herbicide with his father. Another farmer said that one of his sons who had taken part in the agrochemical treatment of his farm has been sick since then. The monitors met that boy.</p> <p>One other farmer reported that he did not comply with any deadline before resuming work on his farm after the agrochemical treatments.</p> <p><u>Source:</u> Interviews, Observation</p>	
<p><b>Company Action Plan:</b></p> <ul style="list-style-type: none"> <li>• See CL 1, 2, 3 &amp; 9</li> </ul> <p>In addition, Olam will engage the cooperative to guarantee the availability of sufficient number of farm applicators in the communities and focus on the sensitization of farmers to use these trained and equipped applicators for their chemical applications.</p> <p>Furthermore, the refreshment training of farms applicators will take into account the</p>	

	safe disposal of empty chemical containers in order to avoid the negative impact on the environment and on human being.
<b>Deadline Date:</b>	December 2019
<b>Evacuation Requirements and Procedure</b>	
<b>Benchmarks:</b>	<b>Noncompliance in all farms</b>
<i>HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.</i>	
<b>Findings/Noncompliance Explanation:</b>	<p>Although the visited farms are not closed areas that require any evacuation procedure at first sight, the fact remains that bushfires are common and can at any time surprise farmers, workers and their families and members of the community on the farms or even in the camps. In addition, there is the risk of intoxication related to chemical treatments of farms. In spite of this, the monitors noted that no mechanism is initiated to sensitize farmers on an evacuation procedure adapted to this specific context.</p> <p><u>Source:</u> Interviews, Observation</p>
<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>In order to equip farmers and workers with procedures for evacuation in case of emergency in the farms or in the camps, Olam will work with specialists to develop an evacuation procedure applicable to farms and camps and develop necessary training and sensitization material accordingly to build the awareness of farmers and workers.</li> <li>This topic will then be added to the existing training and sensitization's content to build the awareness of farmers and their workers.</li> </ul>
<b>Deadline Date:</b>	December 2019

## Compensation

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Noncompliance	Farms 1, 42, 50
	C.1.2	In compliance	
	C.1.3	In compliance	
	C.1.4 (PR)	In compliance	
Minimum Wage/Fair Compensation	C.2.1	Risk of Noncompliance	Farm 1,2,10, 11,12,15 to 19,21,23,24,27,28,32, 33,34, 39,41,42,43,44,47,50,55,56 (27 Farms)
	C.2.2	N/A	
	C.2.3	In compliance	
	C.2.5 (PR)	Not Initiated	All Farms
	C.2.6 (PR)	Not Initiated	All Farms
Farmer/Producer Income	C.3	In compliance	
	C.4 (PR)	In compliance	
Wage Payment and Calculation	C.6	Noncompliance	Farms 1, 42, 50
	C.7.1	In compliance	
	C.7.2	In compliance	
	C.7.3 (PR)	Not Initiated	All Farms

	C.7.4 (PR)	In compliance	
	C.7.5	Noncompliance	Farms 1, 42, 50
	C.8.1	In compliance	
	C.8.2	In compliance	
	C.8.3	N/A	
	C.8.4 (PR)	N/A	
	C.9 (PR)	N/A	
	C.10.1	N/A	
	C.10.1.1	N/A	
	C.10.2	N/A	
	C.10.3	N/A	
Workers Awareness	C.11.1.1	In compliance	
	C.11.1.2	In compliance	
	C.11.1.3	In compliance	
	C.11.1.4	In compliance	
	C.11.1.5	In compliance	
	C.13 (PR)	Not Initiated	All Farms
Fringe Benefits	C.12.1	In compliance	
	C.12.2 (PR)	In compliance	
	C.12.3	N/A	
	C.12.4	N/A	
	C.12.5	N/A	

### Compensation Assessment Summary

General Compliance / Wage Payment and Calculation	
<p><b>Benchmarks:</b></p> <p><b>C.1.1:</b> Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations and procedures concerning the payment of compensation to workers.</p> <p><b>C.6:</b> All wages, including payment for overtime, shall be paid within legally defined time limits. Where no time limits are defined by law, compensation shall be paid at least once a month or upon completion of a seasonal task which takes less than a month.</p> <p>When workers are hired through contractors, brokers or external agencies, employers shall make sure that workers are paid according to the benchmark requirements.</p> <p><b>C.7.5:</b> No one can receive wages on behalf of a worker, unless the worker concerned has, in full freedom, authorized in writing for another person to do so.</p>	<p><b>Noncompliance in 3 farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>According to Ivoirian labor law, "wages are paid at the place of work or at the employer's office when it is close to the work place." In spite of this requirement, three farmers keep the wages of their workers that they pay back at the end of their contract to their parents living in their country of origin (Burkina Faso).</p> <p><u>Source:</u> Interviews</p>	
<p><b>Company Action Plan:</b></p> <p>Wage payment requirements are included in Olam's code of conduct distributed to its suppliers. During training sessions, trainers use these requirements to build the awareness of the farmers. In order to foster the compliance of suppliers regarding the wage payment requirements, Olam will engage the cooperatives to focus on the issue during the training, the sensitization or the coaching sessions. In the worker employment contract template that will be piloted (see ER 2.1; 2.1.1), reference will be made to the fact that farmers should pay the wage to the worker himself and on a regular basis, as provided by local laws.</p>	
<p><b>Deadline Date:</b></p> <p>December 2019</p>	
Minimum Wage/Fair Compensation	

<p><b>Benchmarks:</b></p> <p><i>C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the basis of the legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them.</i></p>		<p><b>Risk of Noncompliance in 27 farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>On the visited farms, the farmers, who have contract workers, pay their workers, at least the prevailing wage which is practiced in the region for their sector of activity. However, these wages may be lower than the legal minimum wage for workers in the agricultural sector, if farmers were not providing them with in-kind benefits such as housing, food and support in the case of disease. It should be noted that it would be difficult for farmers to pay higher wages to their hired workers given the level of their own income and the high fluctuation of cocoa price. Increasing workers' compensation must first go through solutions to improve the income of farmers.</p> <p><u>Source</u> : Interviews, Record review</p>	
<p><b>Company Action Plan:</b></p>	<p>The purchase price of cocoa in Côte d'Ivoire is set up by the government and Olam always complies with the prevailing price.</p> <p>However, in order to support improve farmers' income, Olam and its business partners collaborate to ensure to farmers, distribution of high productivity cocoa yield (when it was authorized by the cocoa and cocoa council), training on Good Agricultural Practices for them to increase their productivity. In addition, Olam will recruit, for this campaign, around 150 (agronomics) to work closely with farmers for coaching to provide them with guidance and advices.</p> <p>Moreover, Olam and its certification and sustainability program partners ensure to their suppliers, the payment of additional premiums. All these efforts are made in the spirit of supporting the improvement of farmers' income and subsequently, improve the income of farms workers.</p> <p>Olam and its partners will continue to explore supplement initiatives to do more.</p>	
<p><b>Deadline Date:</b></p>	<p>December 2020</p>	

## Overview - Farms vs. Non-compliances

**Total number of Farms: 60**

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective Bargaining	Health, Safety and Environment	Hours of Work	Compensation	Total
<b>% of farms with non-compliances or risk of non-compliances</b>	100%	0%	2%	2%	100%	0%	100%	0%	43%	
Farm No. 1	14	0	1	2	5	0	3	0	4	29
Farm No. 2	5	0	0	0	2	0	1	0	1	9
Farm No. 3	2	0	0	0	2	0	1	0	0	5
Farm No. 4	2	0	0	0	2	0	1	0	0	5
Farm No. 5	2	0	0	0	2	0	2	0	0	6
Farm No. 6	2	0	0	0	6	0	5	0	0	13
Farm No. 7	2	0	0	0	2	0	1	0	0	5
Farm No. 8	2	0	0	0	2	0	1	0	0	5
Farm No. 9	2	0	0	0	2	0	4	0	0	8
Farm No. 10	3	0	0	0	2	0	1	0	0	6
Farm No. 11	5	0	0	0	2	0	1	0	1	9
Farm No. 12	5	0	0	0	2	0	1	0	1	9
Farm No. 13	2	0	0	0	2	0	1	0	0	5
Farm No. 14	2	0	0	0	5	0	1	0	0	8
Farm No. 15	5	0	0	0	2	0	1	0	1	9
Farm No. 16	5	0	0	0	2	0	1	0	1	9
Farm No. 17	5	0	0	0	2	0	1	0	1	9
Farm No. 18	5	0	0	0	2	0	1	0	1	9
Farm No. 19	5	0	0	0	2	0	1	0	1	9
Farm No. 20	2	0	0	0	2	0	1	0	0	5
Farm No. 21	5	0	0	0	2	0	1	0	1	9
Farm No. 22	2	0	0	0	2	0	1	0	0	5
Farm No. 23	5	0	0	0	2	0	1	0	1	9
Farm No. 24	5	0	0	0	2	0	1	0	1	9
Farm No. 25	2	0	0	0	2	0	1	0	0	5
Farm No. 26	2	0	0	0	2	0	1	0	0	5
Farm No. 27	5	0	0	0	2	0	1	0	1	9
Farm No. 28	5	0	0	0	2	0	1	0	1	9
Farm No. 29	2	0	0	0	2	0	1	0	0	5
Farm No. 30	2	0	0	0	2	0	1	0	0	5
Farm No. 31	2	0	0	0	2	0	1	0	0	5
Farm No. 32	5	0	0	0	2	0	1	0	1	9
Farm No. 33	5	0	0	0	2	0	1	0	1	9
Farm No. 34	5	0	0	0	2	0	1	0	1	9
Farm No. 35	2	0	0	0	5	0	1	0	0	8

Farm No. 36	2	0	0	0	2	0	1	0	0	5
Farm No. 37	2	0	0	0	2	0	1	0	0	5
Farm No. 38	2	0	0	0	2	0	1	0	0	5
Farm No. 39	5	0	0	0	2	0	1	0	1	9
Farm No. 40	2	0	0	0	2	0	1	0	0	5
Farm No. 41	5	0	0	0	2	0	1	0	1	9
Farm No. 42	11	0	0	0	2	0	1	0	4	18
Farm No. 43	5	0	0	0	2	0	2	0	1	10
Farm No. 44	5	0	0	0	2	0	1	0	1	9
Farm No. 45	2	0	0	0	2	0	1	0	0	5
Farm No. 46	2	0	0	0	2	0	1	0	0	5
Farm No. 47	5	0	0	0	2	0	1	0	1	9
Farm No. 48	2	0	0	0	2	0	1	0	0	5
Farm No. 49	2	0	0	0	2	0	1	0	0	5
Farm No. 50	11	0	0	0	2	0	1	0	4	18
Farm No. 51	2	0	0	0	2	0	1	0	0	5
Farm No. 52	2	0	0	0	2	0	4	0	0	8
Farm No. 53	2	0	0	0	2	0	1	0	0	5
Farm No. 54	2	0	0	0	2	0	1	0	0	5
Farm No. 55	5	0	0	0	2	0	1	0	1	9
Farm No. 56	5	0	0	0	2	0	1	0	1	9
Farm No. 57	2	0	0	0	2	0	1	0	0	5
Farm No. 58	2	0	0	0	2	0	1	0	0	5
Farm No. 59	2	0	0	0	2	0	1	0	0	5
Farm No. 60	2	0	0	0	2	0	1	0	0	5
<b>TOTAL</b>	<b>220</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>133</b>	<b>0</b>	<b>74</b>	<b>0</b>	<b>35</b>	<b>465</b>