

[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



Employment Relationship

Section	Benchmark	Compliance status	Farms
Human Resource Management	ER.1.1	In compliance	
System	ER.2.1 (PR)	In Progress	All Farms
System	ER.2.1.1 (PR)	In Progress	All Farms
	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
Recruitment and Hiring	ER.6 (PR)	Not Initiated	All Farms
Recruitment and mining	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	
	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	
Terms and Conditions	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	
	ER.15.1	In compliance	
	ER.15.2	N/A	
	ER.15.2.1	N/A	
	ER.16.1	Noncompliance	Farms 1,42,50
Administration	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	
	ER.18.1	In compliance	
NAT - of the contract of the c			
Worker Involvement	ER.18.2 (PR)	In compliance	



	ER.20.1	In compliance	
	ER.20.2	In compliance	
	ER.20.3 (PR)	In compliance	
	ER.20.4	In compliance	
Work Rules and Discipline	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	
	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	
HSE Management System	ER.24.4 (PR)		
HSE Management System	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	
	ER.25.1 (PR)	Not Initiated	All Farms
Grievance Procedures	ER.25.2 (PR)	Not Initiated	All Farms
Gilevalice riocedules	ER.25.3	Noncompliance	All Farms
	ER.25.4	Noncompliance	All Farms

Employment Relationship Assessment Summary

Recruitment and Hiring / Proof of Age Documentation

Benchmarks:

ER.3.1: 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.

ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.

ER.3.1.2: 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.

ER.5.3: 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.

Noncompliance in 1 farm

in 3 farms

Findings/Noncompliance Explanation:

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.

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.



	Source: Observation, Interviews			
Company Action Plan:	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.			
	Olam and its customers support the training and sensitization of the farmers who as 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 a 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.			
Deadline Date:	December 2019			
Terms and Conditions				
ER.9.2.1: provisions of national laws	those to which the worker has voluntarily agreed, provided those terms do not fall below: ; d collective bargaining agreements; or	Noncompliance in 3 farms		
workers' rights with respect to freed and the FLA Code through approprio or in the surrounding community. In	form workers about workplace rules, health and safety information, and laws regarding lom of association, compensation, working hours, and any other legally required information, ate means, including posted in local language(s) throughout the workplace's common areas at the case of workplaces with informal labor structures, these communication and awareness support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers	in 43 farms		
ER.13.1: Farmer, sharecropper or an the FLA Code.	y kind of supervisor who is leading workers shall have knowledge of the local labor laws and	in 27 farms		
Findings/Noncompliance Explanation:	In general, farms workers seem to have all agreed the conditions of the employment. However, some of these conditions, such as the payment worker's income to a third person, and the payment of the worker's in from the workplace in another country, practiced in three of the visite below the national legislation and requirements of existing codes of color addition, the majority of workers (35 out of 38 surveyed) are not awarights and the workplace standards, mainly health and safety. Finally, the wide majority of the farmers themselves are not aware of the elements of the codes of conduct in force, as more than 71% of the sample (43 out of 60 farmers) do not participate in training sessions; we directly supervise workers.	t of the come away d farms, fall onduct. vare of their ocal laws and e evaluated		
	Source: Interviews, Observation, Record review			
Company Action Plan:	 Olam will assist the cooperative to raise awareness on workers' was This awareness will be extended to all cooperatives in the supply of the farmers' field school so that all the producers not paying their will stop this practice. Every year, the cooperative organizes 10 field school sessions through producers and workers are trained on good agricultural practices a principles of health, safety and the environment. With the support cooperative will raise the awareness of the producers so that they possibility to their workers or encourage their workers to participal farmers' field school sessions. 	workers directly ugh which and the t of Olam, the give the		



- With Olam's support, the cooperative will conduct workers' training on occupational health and safety and worker rights.
 - The cooperative will encourage producers to participate in farmers' farm schools as well
- 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.
- 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.

Deadline Date:

December 2019

Free Disposal of Wages

Benchmarks:

ER.16.1: Employers may not limit in any manner the freedom of workers to dispose of their wages.

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.

Noncompliance in 3 farms

Findings/Noncompliance Explanation:

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.

Source: Interviews

Company Action Plan:

- With the support of Olam, the cooperative will ask the producers to stop this practice and directly pay the wages of the workers. Also,
- The cooperative will sensitize all its producers on the consequences of this practice that could be assimilated to forced labor.
- 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.
- 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.

Deadline Date:

December 2019

HSE Management System

Benchmarks:

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.

Noncompliance in 43 farms

Findings/Noncompliance Explanation:

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.

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.



	Source: Interviews, Record review
	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,
	 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. Olam will support the cooperative to conduct workers' training or occupational health and safety and worker rights. Olam will engage the cooperative to encourage producers to participate in farmers' field school as well. 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. The coaches will ensure that all workers and producers take part of the training sessions.
Deadline Date:	December 2019

Grievance Procedures

Benchmarks:

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.

ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service providers and suppliers.

Noncompliance in all farms

Findings/Noncompliance Explanation:	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. Source: Interviews, phone test	
Company Action Plan:	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.	
	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.	
	However, through the farmers' field school, Olam will continue to explain to workers and producers the instructions to use the hotline.	
Deadline Date:	December 2019	

Harassment or Abuse



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

Harassment or Abuse Assessment Summary

Violence			
· · ·	the workplace is free from any type of violence, harassment or abuse, be it physical, sexual, This also applies to workers who are brought to the farm by employers, labor contractors or	Risk of Noncompliance in 1 farm	
Findings/Noncompliance Explanation:	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. Source: Observation, Interview		
Company Action Blan			
Company Action Plan :	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.		
Deadline Date :	December 2019		



Forced Labor

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	Noncompliance	Farm 1
	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	
For a dama in a constant and	F.7.1	In compliance	
Freedom in employment and movement	F.7.2	In compliance	
movement	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	
	F.6.1	In compliance	
N/ant of Fourity Magazines	F.6.2	In compliance	
Work of Family Members	F.6.3	In compliance	
	F.6.4	In compliance	
Personal Workers Identification and Other Documents	F.9	In compliance	

General Compliance / Fr	eedom in Employment and Movement				
	Benchmarks: F.1: Employers shall comply with all national laws, regulations and procedures concerning the prohibition of forced labor and 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 standards, Olam collaborates closely with its cooperatives partners to training sessions, sensitizations and distribute leaflets covering FLA's concluding harassment or abuse. For the 2018/2019 cocoa campaign, the strengthened in all the cooperatives with new initiatives consisting	organize ode of conduct, lese efforts will			



	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.
Deadline Date:	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	
	CL.5	In compliance	
Voung Workers	CL.6.1	In compliance	
Young Workers	CL.6.2	Risk of Noncompliance	All Farms
	CL.7	Noncompliance	Farm 1, 6, 14, 35
Apprenticeships and Vocational	CL.8.1 (PR)	In compliance	
Training	CL.8.2 (PR)	N/A	
Children on Premises	CL.9	Noncompliance	Farm 6
Removal and Rehabilitation of	CL.10.1	Noncompliance	All Farm
Child Laborers	CL.10.2 (PR)	In Progress	All Farms

Child Labor Assessment Summary

General Compliance / Immediate Family Members / Minimum Age			
Benchmarks: CL.1: Employers shall comply with al procedures concerning the prohibition	I national laws, ratified international conventions, fundamental labor rights, regulations and on of child labor.	Noncompliance in 4 farms	
completion of compulsory education	O Convention 138 and shall not employ anyone under the age of 15 or under the age for n, whichever is higher. If a country has a specified minimum age of 14 years due to nd educational facilities, employers might follow national legislations but must work to to 15 years.	In 1 farm	
 involved in light work on their parent The work is not dangerou The work does not prejuctor during holidays The work is appropriate to physical development; 	is and not harmful to their health or development; dice their attendance at school and is done within reasonable time limits after school o the child's age and physical condition and does not jeopardize the child's social, moral	in 3 farms	
Findings/Noncompliance Explanation:	During the assessment, monitors identified a contract worker who whis employer as 18 years old. This farmer has forbidden the world.	• •	



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.

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.

Source: Interview, Observations

Company Action Plan:

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

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.

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.

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.

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.

Deadline Date:

December 2019

Young Workers



Benchmarks:

CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.

Risk of Noncompliance in all farms

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.

Noncompliance in 4 farm

Findings/Noncompliance Explanation:

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.

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.

Source: Interview, Observations

Company Action Plan:

• See CL 1, 2 & 3

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.

Deadline Date:

December 2019

Children on Premises

Benchmarks:

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.

Noncompliance in 1 farm

Findings/Noncompliance Explanation:

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.

Source: Observations

Company Action Plan:

• See CL 1, 2 & 3

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.

Moreover, farms inspectors will deserve special attention to such practices to definitely ensure that such practices never occur again in farms.

Deadline Date:

December 2019

Removal and Rehabilitation of Child Laborers

Benchmarks: Noncompliance



CL.10.1: 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.

in all farms

Findings/Noncompliance Explanation:

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.

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.

Source: Interviews, Record review, Observations

Company Action Plan:

- 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.
- Olam will also increase proximity awareness of producers on child labor and health and security through its revised image box.

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.

Deadline Date:

December 2019

Health, Safety and Environment

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	Farms 1,5,6,9,43,52
Decument Maintenance	HSE.2 (PR)	In Progress	All Farms
Document Maintenance, Permits and Certificates	HSE.3.1	N/A	
remits and certificates	HSE.4 (PR)	N/A	
Evacuation Requirements and	HSE.5.1 (PR)	N/A	
Procedure	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
Parsonal Protective Equipment	HSE.7 (PR)	In Progress	All Farms
Personal Protective Equipment	HSE.8	In compliance	



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

HSE Assessment Summary

General Compliance / Ch	nemical Management / Machinery Safety						
Benchmarks: HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the in 6 farms environment.							
chemicals and other hazardous subs	ng, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of tances. It is shall receive training in the proper use and safe operation of machinery, tractors,	Noncompliance in 3 farms					
HSE.11.1: To prevent unsafe exposur made for pregnant women and wor	re to hazardous chemicals and hazardous substances, appropriate accommodations shall be kers under the age of 18, as required by applicable laws or the provisions of the FLA does not unreasonably disadvantage workers.	Noncompliance in 2 farms					
Findings/Noncompliance Explanation:	During the assessment, the monitors noted various evidence that in of existing health, safety and environment laws and codes of conduct.						
	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. One other farmer reported that he did not comply with any deadline before resuming work on his farm after the agrochemical treatments.						
	Source: Interviews, Observation						
Company Action Plan:	• See CL 1, 2, 3 & 9						
	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.						
Furthermore, the refreshment training of farms applicators will take into account							



	safe disposal of empty chemical containers in order to avoid the negat the environment and on human being.	safe disposal of empty chemical containers in order to avoid the negative impact on the environment and on human being.						
Deadline Date:	December 2019							
Evacuation Requirement	ts and Procedure							
Benchmarks: HSE.5.2: Where appropriate, workers	s shall be trained in evacuation procedures at least once per year.	Noncompliance in all farms						
Findings/Noncompliance Explanation:	Although the visited farms are not closed areas that require any evacuat first sight, the fact remains that bushfires are common and can at a farmers, workers and their families and members of the community even in the camps. In addition, there is the risk of intoxication relatreatments of farms. In spite of this, the monitors noted that no initiated to sensitize farmers on an evacuation procedure adapted context. Source: Interviews, Observation	ny time surprise on the farms or ted to chemical o mechanism is						
Company Action Plan:	 In order to equip farmers and workers with procedures for evacule emergency in the farms or in the camps, Olam will work with develop an evacuation procedure applicable to farms and cample necessary training and sensitization material accordingly to build the farmers and workers. This topic will then be added to the existing training and sensitization build the awareness of farmers and their workers. 	th specialists to ps and develop he awareness of						
Deadline Date:	December 2019							

Compensation

Section	Benchmark	Compliance status	Farms
	C.1.1	Noncompliance	Farms 1, 42, 50
General Compliance	C.1.2	In compliance	
General Compilance	C.1.3	In compliance	
	C.1.4 (PR)	In compliance	
	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	
Minimum Wage/Fair	C.2.3	In compliance	
Compensation	C.2.5 (PR)	Not Initiated	All Farms
	C.2.6 (PR)	Not Initiated	All Farms
	C.3	In compliance	
Farmer/Producer Income	C.4 (PR)	In compliance	
	C.6	Noncompliance	Farms 1, 42, 50
Wage Payment and Calculation	C.7.1	In compliance	
wage rayment and Calculation	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	
	C.11.1.1	In compliance	
	C.11.1.2	In compliance	
Workers Awareness	C.11.1.3	In compliance	
Workers Awareness	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

Benchmarks:

C.1.1: Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations and procedures concerning the payment of compensation to workers.

C.6: 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.

When workers are hired through contractors, brokers or external agencies, employers shall make sure that workers are paid according to the benchmark requirements.

C.7.5: 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.

Findings/Noncompliance
Explanation:

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).

Source: Interviews

Company Action Plan:

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.

Deadline Date:

December 2019

Minimum Wage/Fair Compensation

15

Noncompliance in 3 farms



Benchmarks:

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.

Risk of Noncompliance in 27 farms

Findings/Noncompliance Explanation:

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.

Source: Interviews, Record review

Company Action Plan:

The purchase price of cocoa in Côte d'Ivoire is set up by the government and Olam always complies with the prevailing price.

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.

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.

Olam and its partners will continue to explore supplement initiatives to do more.

Deadline Date:

December 2020



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
% of farms with non- compliances or risk of non-compliances	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
TOTAL	220	0	1	2	133	0	74	0	35	465