



[2017]

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

**Company:** Olam

**Country:** Ivory Coast

**Commodity:** Cocoa

**Production Process:** Harvesting

**Cooperative:** COAKA

**Assessment Locations:** Région du Moronou, Département d'Arrah,

**Monitors:** Societal Compliance Initiatives

**Assessment Dates:** 18–24 October 2017

**Number of assessed farms:** 40

**Total area covered:** 113 Ha

**Number of farmers interviewed:** 40

**Total number of workers:** 45

**Number of workers interviewed:** 4

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	Risk of Noncompliance	All Farms
	ER.3.1.1	Risk of Noncompliance	All Farms
	ER.3.1.2	In compliance	
	ER.4	N/A	
	ER.5.1	N/A	
	ER.5.2	N/A	
	ER.5.3	In compliance	
	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		
ER.8.1	In compliance		
Terms and Conditions	ER.9.1	In compliance	
	ER.9.2.1	In compliance	
	ER.9.2.2	In compliance	
	ER.9.2.3	In compliance	
	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	Farms 5, 6, 8
	ER.12.1.1	In compliance	
	ER.12.2	N/A	
	ER.13.1	In compliance	
ER.13.2 (PR)	N/A		
ER.13.3 (PR)	N/A		
Administration	ER.15.1	In compliance	
	ER.15.2	In compliance	
	ER.15.2.1	In compliance	
	ER.16.1	In compliance	
	ER.16.2	In compliance	
	ER.17.2 (PR)	N/A	
	ER.17.3 (PR)	N/A	
ER.17.4 (PR)	N/A		
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	Noncompliance	All Farms
HSE Management System	ER.24.1.	Noncompliance	Farms 5, 6, 8
	ER.24.2 (PR)	In compliance	
	ER.24.3	In compliance	
	ER.24.4.1 (PR)	In compliance	
	ER.24.4.2 (PR)	Not Initiated	All Farms
	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)	In compliance	
	ER.25.2 (PR)	In compliance	
	ER.25.3	Noncompliance	All Farms
	ER.25.4	Noncompliance	All Farms

### Employment Relationship Assessment Summary

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>Risk of Noncompliance in all farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>During their farm visits, monitors did not meet a young hired worker. However, based on interviews with assessed farmers, they note that the farmers of the assessed cooperative rely primarily on the physical appearance or statements of the people they employ. They do not collect any documents necessary for checking and confirming the date of birth of the workers present on their farms. No mechanism is tested by the cooperative to compensate for this gap of farmers who operate in the informal sector.</p> <p><u>Source:</u> Interviews with farmers and workers</p>	
<p><b>Company Action Plan:</b></p> <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><b>Deadline Date:</b></p> <p>December 2019</p>	
Communication	
<p><b>Benchmarks:</b></p> <p><b>ER.12.1:</b> 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.</p>	<p><b>Noncompliance in 3 farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>The cooperative initiates training programs on workplace rules, including health, safety and the environment, freedom of association, compensation, hours of work, and other information required by law. These trainings are in French and are translated into local languages for illiterates. The cooperative also uses images boxes made available by Olam to facilitate understanding.</p>	

	<p>According to the cooperative IMS, these training sessions are intended for farmers and all their workers. However, during the assessment, monitors found that none of the interviewed workers took part in these trainings, for lack of interest or because they felt that they were busy with work. So, they do not have the necessary time to participate.</p> <p>In addition, the participation rate of farmers themselves in these training sessions remains low since the monitors noted that with 17 of the 40 farmers interviewed, 42.5% do not participate.</p> <p><u>Source:</u> Interviews</p>
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<p><b>Company Action Plan:</b></p>	<ul style="list-style-type: none"> <li>• In order to find and provide suitable and sustainable solution to the lack of interest of producers and farmers for the training sessions, Olam will implement a survey to understand the root causes of the issue.</li> <li>• For the meantime, 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> <li>• The cooperative will encourage producers to participate in farmers field schools as well</li> <li>• For the new campaign, Olam will develop a new farmers and workers training methodology through coaching. The coaches at each cooperative level will also sensitize producers and workers to attend the farmers’ field school sessions.</li> <li>• For the 2018/2019 campaign, the new code of conduct distribution will be intensified with the involvement of pure sustainable regional representatives who will make sure that each producer and worker has received a leaflet of Olam Code of Conduct.</li> </ul>
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<p><b>Deadline Date:</b></p>	<p>December 2019</p>
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**Access to Training/Family Members**

<p><b>Benchmarks:</b> <i>ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness raising activities conducted for the workers and growers on the farms.</i></p>	<p><b>Noncompliance in all farms</b></p>
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<p><b>Findings/Noncompliance Explanation:</b></p>	<p>On the assessed farms, most farmers work with their family members. According to the IMS of the cooperative, they are informed and invited to take part in the training sessions organized for farmers. However, none of the family members participate in these trainings. During interviews with some of them, they reported to monitors that they are neither informed of the program nor the location of the training sessions.</p> <p><u>Source</u> : Interviews, Record review</p>
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<p><b>Company Action Plan:</b></p>	<ul style="list-style-type: none"> <li>• Olam will engage the cooperatives to raise the awareness of their producers so that they give the possibility to their family members who area participating in their production activities and encourage them to participate in the farmers’ field school sessions.</li> <li>• The cooperative will post the programs and locations of farmers’ field school at the cooperative headquarter and in all the communities level warehouses. Each community level farmers’ leader and farmers’ trainer will also provide producers and their families with information about the planning and locations of farmers’ field school.</li> <li>• The cooperative will also organize proximity sensitization to reach all producers, workers and members of their families at their household level and also will</li> </ul>
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	intensify the distribution of the CoC leaflets.
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<b>Deadline Date:</b>	December 2019
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### HSE Management System

<b>Benchmarks:</b> <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>	<b>Noncompliance in 3 farms</b>
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<b>Findings/Noncompliance Explanation:</b>	<p>Written policies and procedures for health, safety and environment are implemented on the assessed farms. Indeed, the internal standard of the certification body in force and the Olam code of conduct in force in this cooperative include provisions on health, safety and the environment. Some farmers have access to these policies and procedures through the trainings, flyer and posters deployed by the cooperative and its partner Olam. Some others do not participate in these training for various reasons and do not receive flyers either. During the interviews, the monitors identified 17 farmers who are in this situation.</p> <p>For the workers, they do not have access to these policies and procedures because they do not participate in the trainings and are not taken into account in the distribution of the flyer of Olam CoC. On the other hand, they rarely visit the stores where the posters are displayed to access information. This was confirmed by the four workers interviewed by the monitors on the three farms.</p> <p><u>Source</u> : Interviews, record review</p>
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<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>• As mentioned in the findings, the cooperative, with the support of Olam, organizes farmers' field 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,</li> <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 all the 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 in the training sessions.</li> <li>• The cooperative will also organize proximity sensitization to reach all producers, workers and members of their families at their household level and also distribute the CoC flyers.</li> </ul>
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<b>Deadline Date:</b>	December 2019
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### Grievance Procedures

<b>Benchmarks:</b> <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> <i>ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service</i>	<b>Noncompliance in all farms</b>
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providers and suppliers.

**Findings/Noncompliance Explanation:**

On the flyer format of its code of conduct distributed to farmers, Olam mentioned a toll-free number from which interested parties can reach them to confidentially report any non-compliance and grievance situation. However, this information is not explained to farmers and workers. So, they are not aware of this 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

## Child Labor

### Compliance Status

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

### Child Labor Assessment Summary

#### General Compliance / Immediate Family Members

**Benchmarks:**

**CL.1:** Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.

**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:

- The work is not dangerous and not harmful to their health or development;

**Noncompliance  
in 1 farm**

<ul style="list-style-type: none"> <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>	
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<b>Findings/Noncompliance Explanation:</b>	<p>Opposed to the legal provision in Côte d'Ivoire that require parents to send all children until 16 years old to school, monitors identified a child aged 14, who left school in 6<sup>th</sup> grade to devote himself to the work of the family farm. According to the testimonies collected from the child and his parents, this situation is explained first by the lack of means of parents to support the school fees of the child who is admitted in the first year of college. Then, given these difficulties, the child preferred to give up school to help manage the family farm in replacement of his father who is very old.</p> <p>Although working in the family context, the dedication of this child to the management of the farm at the expense of his schooling is a violation of the requirements in force. In addition, the weeding work he was conducting at the time of the visit is considered as dangerous for his age. Like him, other farmers, even though the monitors did not see them in a working situation, reported that they associate some of their children under the age of 18 in the conduct of their production activities that some might be dangerous for these children</p> <p><u>Source:</u> Interviews, observation</p>
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<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>• Olam will assist the cooperative to send the child to school this school year 2018-2019</li> <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 producers and workers households and farms inspection visits to identify all cases of child laborers, forced labor in plantations and set up suitable remediation.</li> <li>• Olam will continue to sensitize cooperatives and their producers and works on the importance of sending children to school</li> <li>• Olam will assist the cooperative to develop the community service group activities in order to help the aged producers in the maintenance of their farm.</li> <li>• Olam will also increase proximity awareness of producers on child labor and health and security through its revised image box.</li> </ul>
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<b>Deadline Date:</b>	December 2020
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### Young Workers

<b>Benchmarks:</b>	<b>Risk of Noncompliance in all farms</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>	
<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 1 farm</b>

<b>Findings/Noncompliance Explanation:</b>	<p>Farmers visited operate in an informal setting and work primarily with their family members. In general, they cannot read or write. Therefore, they do not keep any list of young workers they may hire and which can provide details on the employment of these young people. No mechanism is currently planned to assist them in this framework.</p>
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	<p>In addition, some farmers mentioned in the interviews that they associate some of their children under 18 years old in their production activities that some, such as weeding, chemical treatment and harvest, are classified as hazardous work that can affect their health. Monitors observed one of these children working on one of the visited farms.</p> <p><u>Source:</u> Interviews</p>
<p><b>Company Action Plan:</b></p>	<ul style="list-style-type: none"> <li>• See CL 1, 3 (excluding the first point)</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 works prohibited will be widely communicated.</p>
<p><b>Deadline Date:</b></p>	<p>December 2020</p>
<p><b>Removal and Rehabilitation of Child Laborers</b></p>	
<p><b>Benchmarks:</b></p> <p><i>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.</i></p>	<p><b>Risk of Noncompliance in all farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>Olam has set up in some of its cooperatives, like this one, a Child Labor Monitoring and Remediation Committee composed to the Farmers’ Relay, the Section Delegates and the Village Authorities, in order to monitor the situations of working children, and raise awareness to their parents. When a child worker is met, the members of the Committee raise awareness among the parents concerned so that they remove the child from the field.</p> <p>But, according to the testimonies of the actors met, this Committee does not provide any framework for effective remediation of child labor, and is not yet fully functional.</p> <p>Apart from this provision, no other mechanism is provided by Olam to facilitate the effective and sustainable remediation of child labor.</p> <p><u>Source:</u> Interviews</p>
<p><b>Company Action Plan:</b></p>	<p>Olam has design a new CLMRS procedure to guide the monitoring and the remediation actions. This will allow CLMRS to be more active in profiling producer households and farms inspection visits to identify all cases of child laborers in plantations. This procedure is being distributed to all cooperatives in the supply chain through the MoU signed at the beginning of the campaign.</p> <ul style="list-style-type: none"> <li>• In addition to the profiling and internal inspections to find the potential or actual child laborers, Olam has planned remediation actions encompassing women empowerment activities through Villages Savings and Loans Activities (VSLA), promotion of Income Generating Avenue (IGA) as well as schools and health centers construction.</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><b>Deadline Date:</b></p>	<p>December 2020</p>



## Health, Safety and Environment

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	In compliance	
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In compliance	
	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	Noncompliance	Farms 5, 6, 8, 12, 13, 14, 37
Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	In compliance	
	HSE.9.2.1	In compliance	
	HSE.10	Noncompliance	Farms 12, 13, 14, 37, 5, 6, 8
	HSE.11.1	In compliance	
Protection Reproductive Health	HSE.11.2 (PR)	In compliance	
	HSE.12.1	In compliance	
Infrastructure	HSE.12.2 (PR)	In compliance	
	HSE.13 (PR)	N/A	
	HSE.17.1	Noncompliance	Farms 1, 2, 3, 16
	HSE.17.2 (PR)	N/A	
	HSE.19 (PR)	In compliance	
	HSE.21 (PR)	In compliance	
Machinery Safety	HSE.22 (PR)	N/A	
	HSE.14.1	Noncompliance	Farm 2
	HSE.14.2	Noncompliance	Farms 12, 13, 14, 37, 5, 6, 8
	HSE.14.3	N/A	
Ergonomics and Medical Facilities	HSE.14.4	In compliance	
	HSE.15.2 (PR)	Not Initiated	All Farms
	HSE.16.2	In compliance	

### HSE Assessment Summary

Evacuation Requirements and Procedure	
<b>Benchmarks:</b> HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>Although the assessed farms are not closed areas that require any evacuation plan at first sight, the fact remains that bushfires are common and can at any time surprise farmers, workers, their families and members of the community on the farms or even in the camps. In addition, there is also the risk of intoxication linked to farm treatments. In spite of this fact, the monitors note that no mechanism is initiated to raise awareness to 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</li> </ul>

	<p>necessary training and sensitization material accordingly to build the awareness of farmers and workers.</p> <ul style="list-style-type: none"> <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>
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<b>Deadline Date:</b>	December 2019
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### Personal Protective Equipment / Chemical Management

<p><b>Benchmarks:</b></p> <p><i>HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.</i></p> <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>	<b>Noncompliance in 7 farms</b>
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<p><b>Findings/Noncompliance Explanation:</b></p>	<p>To enable farmers and their workers to properly use and maintain their Personal Protective Equipment (PPE), the cooperative organizes training for them. These trainings are also intended to provide them with the necessary information on their responsibilities, hazards, risks and the safe use of chemicals.</p> <p>However, the monitors note that 17 of the 40 farmers interviewed and all the workers met do not take part in these trainings, while they sometimes carry out dangerous tasks that require the use of PPE.</p> <p>They also heard from four farmers and three workers who said that they personally carry out the agrochemical treatment of their farms in place of the selected applicators, trained and equipped by the cooperative to perform this task.</p> <p><u>Source:</u> interviews, observations</p>
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<p><b>Company Action Plan:</b></p>	<ul style="list-style-type: none"> <li>Olam will continue to increase proximity awareness of producers on the use of personal protective equipment (PPE)</li> <li>Since several producers and workers do not attend the farmers' field school sessions, Olam has revised its image box to ensure proximity awareness of producers and workers on health, safety and child labor. This will help workers and producers to get good understanding of the consequences of pesticide manipulation.</li> <li>Olam will continue to assist the cooperative to intensify the farmers' awareness on the use of applicators trained and equipped by the cooperative to apply the pesticides on the farms.</li> <li>With the support of Olam, the cooperative will sensitize producers on the consequences of mismanagement of chemicals empty containers</li> <li>Through the sustainable regional representatives, Olam will conduct a survey to understand why producers refuse the use of applicators.</li> </ul>
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<b>Deadline Date:</b>	December 2020
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### Access to Water

<p><b>Benchmarks:</b></p> <p><i>HSE.17.1: Safe and clean potable water for drinking shall be freely available at all times, within reasonable distance of the workplace. For farm settings in water-stressed regions where access to potable water is not always guaranteed, employers shall work with local authorities and other partners to provide clean water in sufficient volume and quality to guarantee the wellbeing of hired and family workers.</i></p>	<b>Noncompliance in 4 farms</b>
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<p><b>Findings/Noncompliance Explanation:</b></p>	<p>Although the communities visited have potable drinking water, the surrounding camps where some farmers live, including four of those assessed, lack potable water. The dispersion of these camps in different geographical areas makes any program of</p>
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	<p>provision of drinking water in all these camps complex.</p> <p>No other training and awareness program on water sanitation is being implemented by Olam and its partners to allow farmers and their workers in these communities to clean the water from wells and streams they consume in their camps and on their farms.</p> <p><u>Source:</u> Interviews, observation</p>
<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>• Olam will support the cooperative to develop training on how to treat water and awareness on the importance to treat water before drinking.</li> <li>• With the support of Olam, the cooperative will also rehabilitate the main wells in the camps</li> <li>• With the support of Olam, the cooperative will build a hydraulic pump in the camps</li> </ul>
<b>Deadline Date:</b>	December 2020
<b>Machinery Safety</b>	
<i>Benchmarks:</i>	
<i>HSE.14.1: All production machinery, equipment and tools shall be properly guarded and regularly maintained.</i>	<b>Noncompliance in 1 farm</b>
<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>	<b>in 7 farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>The monitors observed in the home of one of the visited farmers, two agrochemical treatment machines that were not stored properly. One was placed at the entrance of a bedroom and the other at the place of rest. In both situations, these machines are accessible to all and within the reach of children.</p> <p>In addition, the four growers and three workers who reported that they personally treat their farms, handle the agrochemical product treatment machines without initial training.</p> <p><u>Source:</u> Interviews, observations</p>
<b>Company Action Plan:</b>	<ul style="list-style-type: none"> <li>• Since several producers and workers do not attend the farmers' field school sessions, Olam has revised its image box to ensure proximity awareness of producers and workers on health, safety and child labor. This will help workers and producers to get good understanding of the consequences of pesticide manipulation.</li> <li>• Olam will continue to assist the cooperative to intensify the farmers' awareness on the use of applicators trained and equipped by the cooperative to apply the pesticides on the farms.</li> <li>• With the support of Olam, the cooperative will sensitize producers on the consequences of mismanagement of chemicals empty containers</li> </ul>
<b>Deadline Date:</b>	December 2019

## Compensation

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	In compliance	
	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	Farms 4,5,6,9,12,13,16,19,22,23,24,26,30,31,34,40
	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
	C.3	In compliance	
Farmer/Producer Income	C.4 (PR)	In Progress	All Farms
Wage Payment and Calculation	C.6	In compliance	
	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	In compliance	
	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)	In Progress	All Farms
Fringe Benefits	C.12.1	In compliance	
	C.12.2 (PR)	In compliance	
	C.12.3	In compliance	
	C.12.4	In compliance	
	C.12.5	In compliance	

### Compensation Assessment Summary

#### Minimum Wage/Fair Compensation

**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*

**Risk of  
Noncompliance  
in 16 farms**

<i>informed by the employer about the legal minimum wage applicable to them.</i>	
<b>Findings/Noncompliance Explanation:</b>	<p>On the assessed farms which employ contract workers, the farmers pay 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 in-kind benefits such as housing, food and support in the event of illness.</p> <p>Anyway, 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>
<b>Company Action Plan:</b>	<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 improved 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 farm workers.</p> <p>Olam and its partners will continue to explore supplement initiatives to do more.</p>
<b>Deadline Date:</b>	December 2019

### Overview - Farms vs. Non-compliances

**Total number of Farms: 40**

	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%	0%	0%	100%	0%	100%	0%	38%	
Farm No. 1	5	0	0	0	2	0	2	0	0	9
Farm No. 2	5	0	0	0	5	0	3	0	0	13
Farm No. 3	5	0	0	0	2	0	2	0	0	9

Farm No. 4	5	0	0	0	2	0	1	0	1	9
Farm No. 5	7	0	0	0	2	0	2	0	1	12
Farm No. 6	7	0	0	0	2	0	4	0	0	13
Farm No. 7	5	0	0	0	2	0	1	0	0	8
Farm No. 8	7	0	0	0	2	0	4	0	0	13
Farm No. 9	5	0	0	0	2	0	1	0	1	9
Farm No. 10	5	0	0	0	2	0	1	0	0	8
Farm No. 11	5	0	0	0	2	0	1	0	0	8
Farm No. 12	5	0	0	0	2	0	4	0	1	12
Farm No. 13	5	0	0	0	2	0	4	0	1	12
Farm No. 14	5	0	0	0	2	0	4	0	0	11
Farm No. 15	5	0	0	0	2	0	1	0	0	8
Farm No. 16	5	0	0	0	2	0	2	0	1	10
Farm No. 17	5	0	0	0	2	0	1	0	0	8
Farm No. 18	5	0	0	0	2	0	1	0	0	8
Farm No. 19	5	0	0	0	2	0	1	0	1	9
Farm No. 20	5	0	0	0	2	0	1	0	0	8
Farm No. 21	5	0	0	0	2	0	1	0	0	8
Farm No. 22	5	0	0	0	2	0	1	0	1	9
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	5	0	0	0	2	0	1	0	0	8
Farm No. 26	5	0	0	0	2	0	1	0	1	9
Farm No. 27	5	0	0	0	2	0	1	0	0	8
Farm No. 28	5	0	0	0	2	0	1	0	0	8
Farm No. 29	5	0	0	0	2	0	1	0	0	8
Farm No. 30	5	0	0	0	2	0	1	0	1	9
Farm No. 31	5	0	0	0	2	0	1	0	1	9
Farm No. 32	5	0	0	0	2	0	1	0	0	8
Farm No. 33	5	0	0	0	2	0	1	0	0	8
Farm No. 34	5	0	0	0	2	0	1	0	1	9
Farm No. 35	5	0	0	0	2	0	1	0	0	8
Farm No. 36	5	0	0	0	2	0	1	0	0	8
Farm No. 37	5	0	0	0	2	0	4	0	0	11
Farm No. 38	5	0	0	0	2	0	1	0	0	8
Farm No. 39	5	0	0	0	2	0	1	0	0	8
Farm No. 40	5	0	0	0	2	0	1	0	1	9
TOTAL	206	0	0	0	83	0	64	0	15	368