



[2018]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

Company: Olam

Country: Ivory Coast

Crop: Cocoa

Production Process: Post Harvesting

Assessment Location: Région du Haut Sassandra, préfecture de
VAVOUA

Monitor: Societal Compliance Initiatives

Assessment Dates: 05-13 February 2019

Number of assessed farms: 60

Total area covered: 198 ha

Number of farmers interviewed: 60

Total number of workers: 73

Number of workers interviewed: 28

Note : This year's IEMs visits took place during a transitional period between the end of the harvest period and the establishment of new plots. Some producers were in their last harvest, others were clearing new plots while still others were at rest waiting for the first rains to start crops. This allowed observation of people involved in activities other than those seen during the normal harvest period.

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	All Farms
	ER.3.1.1	Noncompliance	All Farms
	ER.3.1.2	In compliance	
	ER.4	In compliance	
	ER.5.1	In compliance	
	ER.5.2	In compliance	
	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		
Terms and Conditions	ER.9.1	In compliance	
	ER.9.2	In compliance	
	ER.9.2.1	In compliance	
	ER.9.2.2	In compliance	
	ER.9.2.3	In compliance	
	ER.9.3	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 1,2,3,5,7,8,13,18,22,23,24,32,37,38,39,40,41,49,50,56
	ER.12.1.1	In compliance	
	ER.12.2	In compliance	
	ER.13.1	In compliance	
ER.13.2 (PR)	In compliance		
ER.13.3 (PR)	In compliance		
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)	In compliance	
	ER.17.3 (PR)	In compliance	
	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	Noncompliance	All Farms
	ER.20.2	Noncompliance	All Farms
	ER.20.3 (PR)	Not Initiated	All Farms
	ER.20.4	Noncompliance	All Farms

	ER.20.6	Noncompliance	All Farms
	ER.20.7	Noncompliance	All Farms
	ER.20.8	Noncompliance	All Farms
	ER.20.9 (PR)	Not Initiated	All Farms
	ER.20.11	Noncompliance	All Farms
Access to Training for Family Members	ER.21	Noncompliance	Farms 1,2,3,5,7,18,22,23,24,32,37,38,39,40,41,49,50,56
HSE Management System	ER.24.1.	Noncompliance	Farms 1,2,3,5,7,13,18,22,23,24,32,37,38,39,40,41,49,50,56
	ER.24.2 (PR)	In compliance	
	ER.24.3	In compliance	
	ER.24.4 (PR)	In compliance	
	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	
Grievance Procedures	ER.24.5 (PR)	In compliance	
	ER.25.1 (PR)	In compliance	
	ER.25.2 (PR)	Not Initiated	All Farms
	ER.25.3	In compliance	
	ER.25.4	In compliance	

Employment Relationship Assessment Summary

Proof of Age Documentation	
<p>Benchmarks:</p> <p>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.</p> <p>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</p>	Noncompliance in all farms
<p>Findings/Noncompliance Explanation:</p> <p>The monitors note that the producers of the assessed cooperative do not verify proof of age verification for all workers, including young people, when hiring them on the plantation. And they do not work on collecting and maintaining any document that confirms the date of birth of the workers. They focus on the physical appearance or the statements of workers when they hire. This situation is the consequence, on the one hand, of the lack of identification document for the majority of workers, and on the other hand of the illiteracy of the majority of producers who therefore do not have neither the reflex nor the culture of documentation archiving. No mechanism has been experienced by the cooperative to fill this gap of farmers who work in the informal sector.</p> <p><u>Source:</u> Interviews, Review of individual producer files</p>	
<p>Company Action Plan:</p> <p>Olam will sensitize all the suppliers on the importance of collecting and keeping worker identification documents by their producer members. Olam has started working with the ADGs (Group Administrators) by elaborating a standard working contract to be signed by all the new hires. The contract will be signed along with the presentation of copy of the worker personal identity card or birth certificate</p> <p>Olam will encourage suppliers to make all producers aware of the importance of</p>	

	keeping copies of workers' identification documents.
Deadline Date:	December 2020

Terms and Conditions	
<p>Benchmarks:</p> <p><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></p>	Noncompliance in 20 farms
<p>Findings/Noncompliance Explanation:</p> <p>Despite the training provided by Relay Producers and Producers' Trainers on work standards, the monitors note that the 28 workers interviewed (working in 20 of the 60 plantations evaluated) do not understand the work standards. None of them is informed of the existence of a code of conduct in force in the cooperative.</p> <p><u>Source:</u> Interviews</p>	
<p>Company Action Plan:</p> <p>Olam will help the suppliers to sensitize all the workers on the importance of training on social standards</p> <p>Workers will be encouraged and organized to attend the training session through the farmers' field school.</p> <p>Olam will ask all CLMRS teams of each supplier level to put more emphasis on social standards topics when sensitizing workers and their household during the profiling. Olam will make sure that all the workers have received the Olam supplier code leaflet showing more information on health and security at work.</p>	
Deadline Date:	December 2020

Work Rules and Discipline	
<p>Benchmarks:</p> <p><i>ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).</i></p> <p><i>ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.</i></p> <p><i>ER.20.4: The disciplinary system shall be applied in a fair and non-discriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.</i></p> <p><i>ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.</i></p> <p><i>ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.</i></p> <p><i>ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.</i></p> <p><i>ER.20.11: The disciplinary system shall include a third-party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.</i></p>	Noncompliance in all farms
<p>Findings/Noncompliance Explanation:</p> <p>At the end of the visits, the monitors note that there are disciplinary procedures provided by the cooperative's certification body and its chocolate partner to govern their relations and those among the cooperative and the producers. But this disciplinary procedure does not consider the relations among producers and their workers. No formal disciplinary rule governs relations between producers and their workers on the farms.</p> <p><u>Source:</u> Interviews, Review of procedures and CoC.</p>	

Company Action Plan:	Olam will work with all the suppliers to develop a disciplinary procedure between producers and workers. This procedure will be shared with all the workers and producers and explained through the farmer field school.
Deadline Date:	December 2020

Access to Training for Family Members	
Benchmarks: <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>	Noncompliance in 18 farms
Findings/Noncompliance Explanation:	Training sessions are organized for all producers and their workers, their family members and all members of the community. However, no family members, including the family workers interviewed, participated in these training sessions. In one of the visited communities, the wives of two producers who happen to be themselves producers, explained that their local culture prevents them from participating in training alongside their husbands, although no provision is made to organize separate training sessions. <u>Source:</u> Interview, review of training attendance lists
Company Action Plan:	The training session through the farmer field schools is opened to all the producers and workers. Olam will help the supplier to have discussions with the women not participating in the training due to their activities. This discussion will help to plan training sessions over another period more suitable to women availability and their needs as topics to be trained.
Deadline Date:	December 2020

HSE Management System	
Benchmarks: <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>	Noncompliance in 20 farms
Findings/Noncompliance Explanation:	Interviews have shown that workers do not participate in training sessions where health, safety and environmental rules are communicated to participants. In addition, they are not considered in the distribution of leaflets of the code of conduct of the cooperative's chocolate partner, which also contains this information. They are therefore not informed of the health, safety and environmental rules in force. <u>Source:</u> Interviews
Company Action Plan:	Olam will help the suppliers to sensitize all the workers on the importance of training on health and security at work and environment. Workers will be encouraged and organized to attend the training session through the farmers' field schools. Olam will ask all CLMRS teams of each supplier level to put more emphasis on the topics on health and security at work when sensitizing workers and their

	household during the profiling. Olam will make sure that all the workers have received the Olam supplier code leaflet showing more information on health and security at work.
Deadline Date:	December 2020

Non-discrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Noncompliance	Farms 32, 33
Recruitment and Employment Practices	ND.2.1	In compliance	
	ND.2.3	In compliance	
Compensation Discrimination	ND. 3	Noncompliance	Farms 32, 33
Discrimination in Training and Communication	ND. 4	Noncompliance	Farms 32, 33
Marital or Pregnancy-Related Discrimination	ND.5.1	In compliance	
	ND.5.2	In compliance	
	ND.5.3	In compliance	
	ND.6.1	In compliance	
	ND.6.1.1	In compliance	
Health-Related Discrimination	ND. 7	In compliance	
	ND.8	In compliance	
	ND. 9	In compliance	
Respect of Culture and Religion	ND.11	In compliance	

Non-discrimination Assessment Summary

General Compliance	
<p>Benchmarks:</p> <p>ND.1: Employers shall comply with all national laws, regulations and procedures concerning non-discrimination.</p> <p>ND.3: There shall be no differences in compensation for workers performing equal work or work of equal value on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, employment status (e.g. local workers vs. migrant workers), or membership in unions or other workers' representative bodies.</p> <p>ND.4: Employers shall guarantee that all workers have equal access to training and capacity building and no discrimination takes place based on the characteristics noted above, nor on literacy or location of the workers. Training and communication should be given in the native language accessible to workers.</p>	<p>Noncompliance in two farms</p>
<p>Findings/Noncompliance Explanation:</p> <p>During the visits, the monitors collected testimonies from two women producers who are members of the evaluated cooperative. They told them that cultural practices prohibit women from participating in training alongside men and selling their own production themselves. Their crops would be sold, either by their spouse or by one of their sons. Therefore, there is no guarantee that they will receive the right amount for their efforts after marketing, since the sales are made without proof of purchase and that the sellers have all the latitude to declare the amount of their choice. Olam and its partners have not yet implemented measures to remedy this lack of access to training for women.</p> <p><u>Source:</u> Interview</p>	
<p>Company Action Plan:</p> <p>The training session through the farmers' field schools is opened to all the</p>	

	<p>producers and workers. Olam will help the supplier to have discussions with the women not participating in the training due to their activities. This discussion will help to plan training sessions over another period more suitable to women availability and their needs as topics to be trained.</p> <p>Olam will help the suppliers to develop training on gender to break all kinds of stereotypes. The supplier will organize group discussions with the community to get the consent of men to allow and encourage women who produce cocoa to sell their product themselves.</p>
Deadline Date:	December 2020

Forced Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	Noncompliance	Farm 19
Freedom in Employment and Movement	F.2	Noncompliance	Farm 19
	F.3	In compliance	
	F.4.1	In compliance	
	F.4.2	In compliance	
	F.5.1	In compliance	
	F.5.2	In compliance	
	F.5.3	In compliance	
	F.7.1	In compliance	
	F.7.2	Noncompliance	Farm 19
	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	
Work of Family Members	F.8	In compliance	
	F.6.1	In compliance	
	F.6.2	In compliance	
	F.6.3	In compliance	
Personal Workers Identification and Other Documents	F.6.4	In compliance	
	F.9	Noncompliance	Farm 19

Forced Labor Assessment Summary

General Compliance	
<p>Benchmarks:</p> <p><i>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.</i></p>	Noncompliance in one farm

F.2: All workers shall have the right to enter into and to terminate their employment freely.
F.7: Employers shall not utilize practices that restrict workers freedom of movement or ability to terminate his or her employment. Examples of such practices include, but are not limited to:
F.7.2: requiring deposits;
F.9: Workers shall retain possession or control of their passports, identity papers, travel documents, and other personal legal documents. Employers may obtain copies of original documents for record-keeping purposes, or as ID substitute.

Findings/Noncompliance Explanation:	<p>During interviews, a woman producer told the monitors that she has the original identification document of her worker (sharecropper). She explained that she acts for preventing the worker from unilaterally terminating the contract before term and preventing his desertion following cases of theft he could commit. In any event, this situation opposed forced labor requirements in particular, the right for any worker to keep his original identification documents himself, the freedom of the worker to terminate at any time his employment and the freedom of movement of the worker.</p> <p><u>Source:</u> Interviews, Document review</p>
Company Action Plan:	<p>Forced labor is forbidden as well as child labor therefore Olam on yearly basis organize training on labor practices with all the suppliers in its supply chain. Olam also ensure that its code of conduct dealing this topic is clearly visible through the posters and leaflets distributed to the farmers, to increase the awareness about what is acceptable and not, as labor practices</p> <p>Olam will assist the supplier to discuss with the woman farmer identified and make her understand her rights and duties, along with the rights and duties of her worker, so that she immediately returns the original of the worker identification paper, keeping a copy.</p> <p>Olam will ask the CLMRS team at each supplier level to put more focus on adult forced labor awareness raising during the farm inspections and household visits.</p>
Deadline Date:	December 2020

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	Farms 3, 32,39, 51
Minimum Age	CL.2	In compliance	
Immediate Family Members	CL.3	Noncompliance	Farms 3, 39
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	In compliance	
	CL.6.1	In compliance	
	CL.6.2	In compliance	
	CL.7	In compliance	
Apprenticeships and Vocational Training	CL.8.1 (PR)	In compliance	
	CL.8.2 (PR)	In compliance	
Children on Premises	CL.9	Noncompliance	Farms 32, 33, 40, 44, 52, 58
Removal and Rehabilitation of Child Laborers	CL.10.1	In compliance	
	CL.10.2 (PR)	In compliance	

Child Labor Assessment Summary

General Compliance	
<p>Benchmarks</p> <p><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></p> <p><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></p> <ul style="list-style-type: none"> • The work is not dangerous and not harmful to their health or development; • The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays; • The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral or physical development; • The child's parents provide supervision and guidance. 	<p>Noncompliance in 4 farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>The monitors gathered testimonies from four producers who reported on the participation of their family members between the ages of nine and 16 in the production work on their farms. These children would undertake all types of production work, including work considered dangerous for their age. These children are either out of school or never attended school. All these situations violate ILO Convention 138 ratified by Côte d'Ivoire, as well as national laws and decrees on education and the minimum age for access to light work.</p> <p><u>Source:</u> Observation, interviews, document review</p>
<p>Company Action Plan:</p>	<p>Forced labor is forbidden as well as child labor, therefore, Olam on yearly basis organizes training on labor practices with all the suppliers in its supply chain.</p> <p>Olam will assist the supplier through its CLMRS to reach these four producers in order to check if they have already been profiled over the season, then to understand the activities done by the children and how it could be remediated so that these children may attend school (vocational or not).</p> <p>Olam has intensified for this campaign the action of the CLMRS committees at each supplier level. More focus is put on farms inspections and remediation action and the follow up of the cases identified.</p> <p>During the current season, all the producers and their households will be profiled through a digital app.</p>
<p>Deadline Date:</p>	<p>December 2020</p>

Children on Premises	
<p>Benchmarks</p> <p><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></p>	<p>Risk of Noncompliance in 6 farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>The monitors observed that some producers live with their families in camps located within or near the farms. They told the monitors that they do not remove their families from these camps during the phytosanitary treatment periods. In addition, they do not take any other safe preventive measures.</p> <p><u>Source:</u> Interviews, observation</p>
<p>Company Action Plan:</p>	<p>Olam will assist suppliers to sensitize the producers living in the settlements on the danger of pesticides on human body mainly on children and encourage them to</p>

	<p>secure their family by sending them away from the settlement located in farms, while spraying agrochemical products.</p> <p>Olam will help all the suppliers to sensitize producers and workers on the use of agro-chemical, the management of empty containers and the use of applicators trained and equipped to treat their farm. Olam will make sure that there is more focus on this topic when doing the training in farmers' field schools. The CLMRS team at each supplier level will emphasize on this topic when doing the household sensitization.</p>
Deadline Date:	December 2020

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	Farms 2,13,15,40,41,42,48,50,52,53,54,55,57,58,59,60
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In compliance	
	HSE.3.1	In compliance	
	HSE.4 (PR)	In compliance	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	In compliance	
	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	In compliance	
	HSE.11.1	Noncompliance	Farms 13, 26,27, 28, 29, 31, 32, 47, 48, 49, 51
Protection Reproductive Health	HSE.11.2	In compliance	
	HSE.12.1	In compliance	
Infrastructure	HSE.12.2 (PR)	In compliance	
	HSE.13 (PR)	In compliance	
	HSE.17.1	In compliance	
	HSE.17.2 (PR)	In compliance	
	HSE.19 (PR)	In compliance	
	HSE.21 (PR)	In compliance	
Machinery Safety	HSE.22 (PR)	In compliance	
	HSE.14.1	In compliance	
	HSE.14.2	In compliance	
	HSE.14.3	In compliance	
Ergonomics and Medical Facilities	HSE.14.4	In compliance	
	HSE.15.2 (PR)	Not Initiated	All Farms
	HSE.16.2	Noncompliance	Farms 21 to 40

Assessment Summary

General Compliance	
<p>Benchmarks: HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.</p>	
Noncompliance in 16 farms	
<p>Findings/Noncompliance Explanation:</p>	<p>The monitors observed empty boxes of agrochemical products, ill-disposed on the farms of two of the producers visited. These boxes could constitute risks for children who use them as play tools, as well as for families since they very often end up in households as boxes for the storage of cooking salt, as the monitors have been able to observe in the families of some visited producers. The monitors also collected testimonies from 13 producers who carry out the agrochemical treatment of their farms themselves, without adequate equipment. These situations are in violation of the requirements of the supplier code of Olam in force in this cooperative, which stipulates that producers must adopt good management of empty packaging of agrochemical products and must not themselves carry out the chemical treatment of farms.</p> <p><u>Source:</u> Interview, observation</p>
<p>Company Action Plan:</p>	<p>Olam will help suppliers sensitize the producers on the danger of pesticides on children.</p> <p>Olam will help all the suppliers to sensitize producers and workers on the use of agro-chemical, the management of empty containers and the use of applicators trained and equipped to treat their farm. Olam will make sure that there is more focus on this topic when doing the training in farmer's field schools and over coaching sessions. The CLMRS team at each supplier level will emphasize this topic when doing the household sensitization. Olam will help the suppliers to increase when necessary the number of their sprayers to ensure that all the producers in need could use sprayers to treat their farms.</p>
<p>Deadline Date:</p>	December 2020

Evacuation Requirements and Procedure	
<p>Benchmarks: HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.</p>	
Noncompliance in all farms	
<p>Findings/Noncompliance Explanation:</p>	<p>Producers assessed are not trained in evacuation procedures. Even if the farms are not enclosed spaces, which require an evacuation plan, threats of bushfires and risks of poisoning, reptile bites and injuries are often recorded during farm work. It would therefore be useful for producers and workers to be aware of the basic evacuation measures to follow.</p> <p><u>Source:</u> Interviews and observation</p>
<p>Company Action Plan:</p>	<p>With the support of Olam, the cooperative will initiate the training of a team on fire-fighting system and treatment of snake bites. This team will be equipped accordingly by the cooperative. With the support of the farmers' leaders and the agronomist, the cooperative, will set up an evacuation mechanism in each of its sections to evacuate the producers, their families and workers in case of any</p>

	emergency. This mechanism will be communicated to all producers and workers of the cooperative
Deadline Date:	December 2020

Chemical Management	
<p>Benchmarks: <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>	
Noncompliance in 11 farms	
Findings/Noncompliance Explanation:	<p>The monitors note that some farmers live with members of their families, including women and children, in camps within or near their farms. No precaution is taken during the agrochemical treatments of the farms, to avoid that these people are not exposed to the harmful effects of the chemicals used. This is particularly the case in 11 of the evaluated farms.</p> <p><u>Source:</u> Interviews</p>
Company Action Plan:	<p>Olam will help suppliers sensitize the producers on the danger of pesticides on children.</p> <p>Olam will help all the suppliers to sensitize producers and workers on the use of agro-chemical, the management of empty containers and the use of applicators trained and equipped to treat their farm. Olam will make sure that there is more focus on this topic when doing the training in farmer's field schools and over coaching sessions. The CLMRS team at each supplier level will emphasize this topic when doing the household sensitization. Olam will help the suppliers to increase when necessary the number of their sprayers to ensure that all the producers in need could use sprayers to treat their farms.</p>
Deadline Date:	December 2020

Medical Facilities	
<p>Benchmarks: <i>HSE.16.2: Medical facilities shall be established and maintained as required by applicable laws. In case of no local law, the employer shall ensure that the workers are able to utilize local service providers in case of medical emergencies and have the local medical officer's contact address available to the workers. In the case of a medical emergency, e.g., injury or sudden illness, growers will not unreasonably delay allowing a worker to have access to medical treatment.</i></p>	
Noncompliance in 20 farms	
Findings/Noncompliance Explanation:	<p>None of the sections visited have a medical center. The nearest health centers are between 3 and 8 km away. For the medical care of its producers, the cooperative has equipped its sections with first aid kits except one of the three sections concerned by the evaluation. According to the representative of the IMS, this situation is explained by the fact that this section recently joined the cooperative's program.</p> <p><u>Source:</u> Interview, observation</p>
Company Action Plan:	<p>Olam will help the supplier to provide this section with a first aid kit.</p> <p>A focal point will manage this kit to avoid the misuse of the container of the kit.</p>

	The focal point will register the cases of injuries.
Deadline Date:	December 2020

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	In compliance	
Minimum Wage/Fair Compensation	C.2.1	In compliance	
	C.2.2	In compliance	
	C.2.3	In compliance	
	C.2.4 (PR)	Not to be answered by monitors. The FLA is working on analyzing the situation based on real wage data collected during IEMs.	
	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 Progress	All Farms
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	In compliance	
	C.7.2	Noncompliance	Farms 7 to 12, 14, 21,22,23,25 to 31, 33 to 36, 38,39, 40, 45,47,48,49,50,54 to 60
	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	In compliance	
	C.8.4 (PR)	In compliance	
	C.9 (PR)	In compliance	
	C.10.1	In compliance	
	C.10.1.1	In compliance	
	C.10.2	In compliance	
C.10.3	In compliance		
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	
Fringe Benefits	C.13 (PR)	In compliance	
	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

Wage Payment and Calculation	
<p>Benchmarks: <i>C.7.2: FLA-affiliates shall ensure that farmers/producers receive payments and certification premiums through a traceable and reliable payment system.</i></p>	
Noncompliance in 34 farms	
Findings/Noncompliance Explanation:	<p>The salaries of some IMS staff members are not regular. There were five months late at the time of the evaluation. In addition, the representative of the IMS reported that all the producers received the certification premium during the previous campaign, while 60% (36) testified that they had not received it. No proof of payment of that premium could be provided by the cooperative.</p> <p><u>Source:</u> Interview, documentation</p>
Company Action Plan:	<p>Olam has deeply improved the management of the salaries of the IMS members, by ensuring a direct digital payment to four of the employees at each supplier; i.e., the ADG and three lead farmers declared by the cooperative. Therefore, Olam will work with the supplier to ensure that the rest of the IMS team is regularly paid by the supplier.</p> <p>Olam has highly improved its procedure of premium payment verification at farmer level, which enables the verification of the payment of a sample of producers in a live interview with the farmers by the Olam field staff. The sample is defined as the square root of the total number of farmers by the M&E team of Olam and the survey is conducted over two months, just after the payment of the first slice of the premium to the supplier. It's only when the premium is confirmed having been paid at farmer level, that the second slice of the premium is being paid by Olam to the supplier. Therefore, Olam will intensify the requirement to each supplier to set up booklets of vouchers to confirm the premium payment to farmers, going forward. For the cases of the 36 farmers claiming a non-payment of the premium, a specific investigation will be done by Olam and if the claim is confirmed, the supplier will have to regularize the payment of the premium to the concerned farmers.</p>
Deadline Date:	December 2020

Overview - Farms vs. Non-compliances

Total number of Farms:

	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%	3%	0%	2%	15%	0%	100%	0%	60%	
Farm No. 1	12	0	0	0	0	0	1	0	0	13
Farm No. 2	12	0	0	0	0	0	2	0	0	14
Farm No. 3	12	0	0	0	2	0	1	0	0	15
Farm No. 4	9	0	0	0	0	0	1	0	0	10
Farm No. 5	12	0	0	0	0	0	1	0	0	13
Farm No. 6	9	0	0	0	0	0	1	0	0	10
Farm No. 7	12	0	0	0	0	0	1	0	1	14
Farm No. 8	12	0	0	0	0	0	1	0	1	14
Farm No. 9	9	0	0	0	0	0	1	0	1	11
Farm No. 10	9	0	0	0	0	0	1	0	1	11
Farm No. 11	9	0	0	0	0	0	1	0	1	11
Farm No. 12	9	0	0	0	0	0	1	0	1	11
Farm No. 13	12	0	0	0	0	0	3	0	0	15
Farm No. 14	9	0	0	0	0	0	1	0	1	11
Farm No. 15	9	0	0	0	0	0	2	0	0	11
Farm No. 16	9	0	0	0	0	0	1	0	0	10
Farm No. 17	9	0	0	0	0	0	1	0	0	10
Farm No. 18	12	0	0	0	0	0	1	0	0	13
Farm No. 19	9	0	0	4	0	0	1	0	0	14
Farm No. 20	9	0	0	0	0	0	1	0	0	10
Farm No. 21	9	0	0	0	0	0	2	0	1	12
Farm No. 22	12	0	0	0	0	0	2	0	1	15
Farm No. 23	12	0	0	0	0	0	2	0	1	15
Farm No. 24	12	0	0	0	0	0	2	0	0	14
Farm No. 25	9	0	0	0	0	0	2	0	1	12
Farm No. 26	9	0	0	0	0	0	3	0	1	13
Farm No. 27	9	0	0	0	0	0	3	0	1	13
Farm No. 28	9	0	0	0	0	0	3	0	1	13
Farm No. 29	9	0	0	0	0	0	3	0	1	13
Farm No. 30	9	0	0	0	0	0	2	0	1	11
Farm No. 31	9	0	0	0	0	0	3	0	1	13
Farm No. 32	12	3	0	0	3	0	3	0	0	21
Farm No. 33	9	3	0	0	1	0	2	0	1	16

Farm No. 34	9	0	0	0	0	0	2	0	1	12
Farm No. 35	9	0	0	0	0	0	2	0	1	12
Farm No. 36	9	0	0	0	0	0	2	0	1	12
Farm No. 37	12	0	0	0	0	0	2	0	0	14
Farm No. 38	12	0	0	0	0	0	2	0	1	15
Farm No. 39	12	0	0	0	2	0	2	0	1	17
Farm No. 40	12	0	0	0	1	0	3	0	1	17
Farm No. 41	12	0	0	0	0	0	2	0	0	14
Farm No. 42	9	0	0	0	0	0	2	0	0	11
Farm No. 43	9	0	0	0	0	0	1	0	0	10
Farm No. 44	9	0	0	0	1	0	1	0	0	11
Farm No. 45	9	0	0	0	0	0	1	0	1	11
Farm No. 46	9	0	0	0	0	0	1	0	0	10
Farm No. 47	9	0	0	0	0	0	2	0	1	12
Farm No. 48	9	0	0	0	0	0	3	0	1	13
Farm No. 49	12	0	0	0	0	0	2	0	1	15
Farm No. 50	12	0	0	0	0	0	2	0	1	15
Farm No. 51	9	0	0	0	2	0	2	0	0	13
Farm No. 52	9	0	0	0	1	0	2	0	0	12
Farm No. 53	9	0	0	0	0	0	2	0	0	11
Farm No. 54	9	0	0	0	0	0	2	0	1	12
Farm No. 55	9	0	0	0	0	0	2	0	1	12
Farm No. 56	12	0	0	0	0	0	1	0	1	14
Farm No. 57	9	0	0	0	0	0	2	0	1	12
Farm No. 58	9	0	0	0	1	0	2	0	1	13
Farm No. 59	9	0	0	0	0	0	2	0	1	12
Farm No. 60	9	0	0	0	0	0	2	0	1	12
TOTAL	600	6	0	4	14	0	107	0	36	767