

OLAM CAM CORRECTIVE ACTION PLAN 2019 – 2021

Summary of Findings	FLA Principles of Fair Labor and Responsible Sourcing for Agricultural Supply Chains ( <a href="#">Key available here</a> ) (Internal Management Systems Gaps )	FLA Recommendations	Olam’s Corrective Action Plan	Intended Outputs	Intended Outcomes (To be verified by FLA (2021-2022))
<p>Olam Cam staff needs capacity building training on labor standards and building an internal monitoring program.</p> <p>Upstream supply chain partners including farmers, farmers’ groups, buyers, aggregators, supplying to Olam need awareness building on Olam’s Supplier Code and labor standards.</p> <p>There is lack of any grievance mechanisms available to workers and farmers.</p>	<p><b>FLA Principle 1B: Risk Assessment and Traceability Benchmark 1B.2, KPI a</b> Evidence that company establishes progressive timebound commitment to reach full supply chain traceability and reports on the progress</p> <p><b>FLA Principle 7: Collection and Management of Compliance Information Benchmark 7.1, KPI a</b> Company ensures a complete and accurate list and profile of business partners/ supply chain actors, including location, and contact information</p>	<p>Establish internal targets on supply chain traceability for 2020-2021. Olam should consider mapping 80-90 percent of cocoa farmers into their OFIS system and bring them under an internal monitoring system.</p>	<p>In the first phase, Olam will focus on 8 sustainability program zones including Ntui, Makénéné, Mbagassina, Obala, Ayos, Ngomedzap, Ngoro, and Mvoundou. In these zones Olam has identified its Tier One suppliers composed of 54 farmers' organizations, 99 LBAs and 12 QCI. Olam will work with these suppliers to register all farmers who supply cocoa beans to them. Olam will maintain farmers register for all Tier one suppliers. Olam is aware that not all cocoa from these farmers may not be supplied to Olam given the local cocoa market organization.</p>	<p>All the farmers in Olam's cocoa sustainability program must be mapped in the OFIS system between 2019-2021</p>	<p>100 percent farmers from these eight zones are mapped in Olam's OFIS system</p>
	<p><b>FLA Principle 2: Responsible Sourcing and Procurement Benchmark 2.4, KPI a:</b> Evidence of a pre-sourcing and ongoing supplier evaluation system, which includes assessment of a business partner’s commitment to workplace labor standards and cascading the requirements upstream</p>	<p>Increase business with the mapped and loyal suppliers (LBAs, sub-byers, QCIs and traders) who are committed to adhering to Olam’s standards.</p>	<p>During the traceability process, Olam will map all LBA's and traders involved in its supply chain</p>	<p>LBAs, sub-buyers, QCIs and traders involved in Olam supply chain have been mapped</p>	<p>100% traceability of cocoa origin with OT (Olam Traceability)</p>
	<p><b>FLA Principle 4: Business Partner Training and Implementation Benchmark 4.1, KPI a:</b> Evidence that company formally conveys its labor standards to all business partners and receives documented acknowledgment and commitment to uphold and cascade them</p>	<p>Establish direct and written contracts with the GICs, Unions of GICs and Federations of GICs</p>	<p>OSC (Olam Supplier Code) is signed with 86 farmer groups engaged in Olam's sustainability program</p>	<p>All contracts have been signed by both parties</p>	<p>All signed OSC contracts are maintained and displayed in the sourcing locations and a copy is in possession with Olam and the contracted party</p>
	<p><b>FLA Principle 5: Monitoring Benchmark 5.1, KPI b:</b> Documented progress to increase (or the evidence of the increase in) the number or scope of farms monitored for labor standards over time</p>	<p>Register all cocoa farmers living in the area where assessment found high risks of child labor and force labor. Conduct a household survey and involve the cocoa</p>	<p>Depending on the willingness of the farmer, register cocoa farmers in the OFIS system. Focus is on farmers living in areas where high risks of child labor and forced labor was</p>	<p>Child labor and forced labor risk assessment is completed, household survey is completed, and discussion on the implication</p>	<p>8 units where the Olam's sustainability program has an office are tracked by OFIS and assessment</p>

		farmers in Olam's sustainability program.	identified. The same system is used for household survey. Sensitization meetings are organized in various units.	of Olam's sustainability program on farmers is held	actions and farmer dialogues are completed.
<p><b>FLA Principle 3: Company Staff Training</b>  <b>Benchmark 3.2, KPI a:</b>  Evidence for providing appropriate training or other professional development covering all areas of the FLA workplace Code of Conduct and Principles, the integration of standards into business practices, and awareness on the consequences of planning and sourcing/procurement practices on working conditions</p> <p><b>FLA Principle 4: Business Partner Training</b>  <b>Benchmark 4.1, KPI a:</b>  Evidence that company formally conveys its labor standards to all business partners and receives documented acknowledgment and commitment to uphold and cascade them</p> <p><b>FLA Principle 6: Functioning Grievance Mechanism</b>  <b>Benchmark 6.1, KPI a:</b>  Evidence that company facilitates grievance mechanism(s) for the farmers and workers (in cooperation with the employer of the workers and that such mechanism are (UNGP complaint)</p>	<p>Build the capacity of Olam internal staff and supply chain partners including the IMS staff, QCIs, Sub-buyers, traders and LBAs.</p> <p>The capacity building to focus on labor standards, developing a grievance mechanism, monitoring tools, monitoring schedule and protocols (community profiling, household surveys, farm visits, stakeholder interviews etc.).</p>	<p>Olam started the initiative to train all supply chain partners on labor standards : IMS staff, buyers. Child labor committee in implemented in various stations. For the grievance mechanism, Olam will pilot the grievance mechanism required under the certification program (UTZ/RA)</p>	<p>All Olam's staff and LBAs must be aware of labor standards, grievance mechanism, monitoring tools, monitoring schedule and protocols</p>	<p>Evidence for training and internal monitoring system document available. Olam staff is able to explain the program elements, tools, and monitoring process. At least one child labor committee is inaugurated in each unit of Olam's sustainability program</p>	
<p><b>FLA Principle 3: Company Staff Training</b>  <b>Benchmark 3.2, KPI a:</b>  Evidence for providing appropriate training or other professional development covering all areas of the FLA workplace Code of Conduct and Principles, the integration of standards into business practices, and awareness on the consequences of planning and sourcing/procurement practices on working conditions</p> <p><b>FLA Principle 4: Business Partner Training</b>  <b>Benchmark 4.1, KPI a:</b>  Evidence that company formally conveys its labor standards to all business partners and receives documented acknowledgment and commitment to uphold and cascade them</p>	<p>Develop an internal training schedule with topics for 2020-2021 and ensure that continuous training and updating of skills of local staff, LBA, QCI, sub-buyers and traders happen.</p>	<p>Olam will develop an internal training schedule with topics for 2020-2021 and organize trainings for local staff, buyers</p>	<p>Training programs and refresher trainings put in place for Olam staff, and supply chain partners etc.</p>	<p>Certificate of accomplishment delivered to Olam's local staff and LBAs who have successfully completed the training program. Training report with attendance list will be available for review.</p>	

	<p><b>FLA Principle 4: Business Partner Training</b> <b>Benchmark 4.4, KPI a:</b> Evidence that company verifies that labor standards are available in appropriate written or illustrative forms and relevant languages to ensure the access for intermediaries, farmers and workers</p> <p><b>Benchmark 4.5, KPI a:</b> Evidence that labor standards awareness-building activities and trainings are taking place for farmers, workers and family members (where applicable)</p> <ul style="list-style-type: none"> <li>• For farmers engaged for long term, once every two years</li> <li>• For workers engaged for long term, once every year</li> <li>• For farmers and workers engaged in seasonal work, every season</li> </ul>	<p>Make the labor policies visible in the communities by publishing and distributing an illustrated code of conduct.</p> <p>Conduct individual face-to-face sessions and joint community-based sensitization sessions with the producers and their communities.</p>	<p>1) Contact Olam cocoa Côte d'Ivoire to get the existing Olam's illustrated code of conduct; Update this illustrated CoC for Cameroon; publish the illustrated CoC in poster and flyers formats and ensure the distribution of the posters to all Tier One suppliers and the flyers to all the producers involved in the sustainability program.</p> <p>2) Conduct at least 2 community-based sensitizations in each community involved in the program. Conduct at least 1 household sensitization in each household involved in the program.</p>	<p>1) Olam illustrated CoC is updated and made available to 100% tier one suppliers and 100% producers involved in the sustainability program. 2) At least 2 community-based sensitizations in each of the right communities involved in the program are conducted (18 sessions); And at least 1 household sensitization in each household involved in the program is conducted (cover at least 80% of the mapped households for this sensitization)</p>	<p>All tier one suppliers are able to explain Olam's code of conduct. 80% of the farmers and their families have a good understanding of what child labor means and Olam's sustainability program. Illustrated CoC is found posted at public places including the warehouse of the Tier one suppliers in all communities; All the farmers involved in the program have the illustrated CoC. Awareness report including the list of attendees is available at the IMS level.</p>
<p>Olam Cameroon initiated a certification program within which Olam will start building an IMS program. Currently the program focuses on educating farmers on good agriculture practices and covers topics on decent work and improving working conditions only in a limited way.</p>	<p><b>FLA Principle 5: Monitoring</b> <b>Benchmark 5.1, KPI a:</b> Company implements a farm-selection process and a monitoring plan in accordance the risk assessment, goals, traceability and available resources</p>	<p>Build an internal monitoring plan (IMS).</p>	<p>Olam Cam Sustainability program will develop a monitoring plan for 2020-2021</p>	<p>Master 2021-Monthly target is updated and available to all</p>	<p>Master 2021 Monthly target is shared with all local staff and HQ Cocoa Sustainability staff</p>
	<p><b>FLA Principle 7: Collection and Management of Compliance Information</b> <b>Benchmark 7.1, KPI b</b> Company maintains and/or has access to monitoring results. This may include but is not limited to worker information, known representative structures (if any), previously known disputes, accidents, non-compliances, root causes and remedial actions take</p>	<p>Establish a documentation system (preferably online) where all IMS related data such as- internal assessment reports, training and sensitization reports, field visits training photographs, signed contracts etc. are maintained</p>	<p>Sustainability department to get a IMS office (preferably online) where internal inspections, field visits and trainings are maintained</p>	<p>IMS office is based in Ntui where all archives are filed in an online system. A person responsible for inputting the data is identified.</p>	<p>IMS office is well-maintained and is up-to date.</p>
	<p><b>FLA Principle 3: Company Staff Training</b> <b>Benchmark 3.1, KPI a:</b> Company organizational chart designating title, name and contact information of responsible individual(s)</p>	<p>Define clear roles and responsibilities and division of work between Olam Cam staff, its Tier One suppliers, LBA, traders, sub-buyers, QCI etc. on working conditions within the IMS system</p>	<p>Sustainability department to define clear roles and responsibilities and division of work on working conditions within the IMS system</p>	<p>Organization flow chart, job description and other tools are well-described within the IMS system</p>	<p>Roles and responsibilities, Org. Chart for the program and division of work is well-known within the IMS</p>

	<p><b>Benchmark 3.1, KPI b:</b> Job description(s) or other equivalent to demonstrate relevant responsibilities for implementing labor standards</p> <p><b>FLA Principle 4: Business Partner Training</b> <b>Benchmark 4.2, KPI a:</b> Evidence that company formally conveys its requirements for its business partners to facilitate assessments and remediation and receives documented acknowledgment and commitment from them</p>				system and available for review
	<p><b>FLA Principle 8: Timely and Preventive Remediation</b> <b>Benchmark 8.1, KPI a:</b> Evidence that company supports the remediation process at the country level and has a documented process of follow up at a higher level as determined by the headquarters</p>	Work closely with villages' notability to establish community level child labor protection committee, to foster community members' involvement in the sustainability effort and support the work of the internal staff.	Olam Cam to take the responsibility to establish Child Labor Protection Committee (CLPC) at the community level to foster community members involvement in the sustainability effort	CLPC established in various stations with a clear action plan and monitoring system	8 units where Olam sustainability program is executed have dedicated CLPC
There is a need for chemical management in the farms with high risks to family members, including children. Farmers and esp. family members engaged in tasks that are inappropriate to their age such as carrying heavy loads, exposure to pesticides, and snake, and insect bites.	<p><b>FLA Principle 8: Timely and Preventive Remediation</b> <b>Benchmark 8.1, KPI a:</b> Evidence that company supports the remediation process at the country level and has a documented process of follow up at a higher level as determined by the headquarters</p>	Identify agro-chemical companies active in the region to explore collaboration for building awareness at the community and farm level. These companies have local staff who while delivering chemicals can conduct awareness about its use and disposal.	Olam Cam to take initiative to sign MoU with some agro-chemicals companies for building awareness at the community and farm level	MoU signed with some agro-chemicals companies to strengthen awareness	Agro-chemicals suppliers have a MoU with Olam by 2021 and training for farmers on chemical management have initiated.

<p>Visited communities had a high prevalence of children (55%) working on family farms.</p> <p>Of all the children mapped (250), 20% were below the legal minimum age of working (12 years).</p> <p>Forty four (44%) children were involved in conducting hazardous activities.</p> <p>There is lack of understanding amongst the families on what constitutes light work and hazardous work</p>	<p><b>FLA Principle 8: Timely and Preventive Remediation Benchmark 8.1, KPI a:</b> Evidence that company supports the remediation process at the country level and has a documented process of follow up at a higher level as determined by the headquarters</p>	<p>Use innovative means of social communication such as scenarios, film projection followed by explanations, life stories, experience sharing, street plays, broadcasting messages through local radio channels in the local language etc. as opposed to purely having a classroom training</p>	<p>Sustainability department to innovate on social communication</p>	<p>Social media, broadcasting messages, digital tools used to spray some information</p>	<p>Social communication and classroom training both are used as communication channel for household, producer, communities level training. Evidence of innovative materials available for review</p>
	<p><b>FLA Principle 8: Timely and Preventive Remediation Benchmark 8.2, KPI b:</b> Evidence of root-cause analysis and implementation of actions to address the root causes to prevent future risks</p>	<p>Profile all applicable farms to assess the potential risks to plan a suitable action for each household. The IMS should identify within the communities all children of applicable households who are involved in hazardous tasks and/or at risk.</p>	<p>Olam Cam to identify within the communities all children of applicable households involved in hazardous tasks and/or at risk</p>	<p>OFIS App is used to identify, monitor and remediate such hazardous tasks</p>	<p>The Child Labor Monitoring and Remediation System (CLRMS) is installed in the 8 units where Olam will have its sustainability efforts</p>
	<p><b>FLA Principle 8: Timely and Preventive Remediation Benchmark 8.2, KPI b:</b> Evidence of root-cause analysis and implementation of actions to address the root causes to prevent future risks</p>	<p>Develop and communicate a procedure for removal and rehabilitation of child workers, identifying clear steps to undertake in case of occurrence of worst form of child labor or victim of trafficking within the applicable communities.</p>	<p>Olam Cam to develop and communicate a procedure for removal and rehabilitation of child workers and remediation actions in case of worst form</p>	<p>OFIS App with CLMRS will be used for that purpose</p>	<p>The CLMRS is installed in our 8 units</p>
	<p><b>FLA Principle 8: Timely and Preventive Remediation Benchmark 8.2, KPI c:</b> The company should supplement remediation efforts by engaging with appropriate stakeholders to address systemic issues and find solutions in a way that is consistent with the FLA standards</p>	<p>Encourage initiatives to establish community-service groups or self-help groups to overcome the issue of lack of labor force in the communities and so that children are not employed</p>	<p>Olam Cam to take initiative to implement Youth-service groups inside communities where cocoa is sourced.</p>	<p>Youth-services group or self-help groups used to mitigate the lack of labor force</p>	<p>Youth-services groups implemented in 4-6 units for a trial then progressively in our entire stations</p>
<p>Low farmer income was a systemic issue reported by farmers. The low yields and low income does not cover basic needs. Farmers were unable hire labor and hence relied on family members including children</p>	<p><b>FLA Principle 8: Collection and Management of Compliance Information Benchmark 7.2, KPI a:</b> Documented analysis of systemic issues and trends</p>	<p>Collect concrete data on farmer income from cocoa and other crops they produce throughout the year, and information on their spending pattern, expenses and debt situation, so that the actual deficits can be realized.</p>	<p>Olam Cam to collect concrete data on farmer income from cocoa and other crops</p>	<p>Farm development plan FDP from OFIS used to give more explanations to farmers about income diversification and farm management</p>	<p>OFIS system is used in all our units to get more information about concrete data on farmer income from cocoa and other crops</p>
	<p><b>FLA Principle 8: Timely and Preventive Remediation Benchmark 8.2, KPI b:</b> Evidence of root-cause analysis and implementation of actions to address the root causes to prevent future risks</p>	<p>Start developing a strategy and consider implementing a program to support the farmers' households to increase their income</p>	<p>Olam Cam to come out and support income diversification activities</p>	<p>Farm development plan FDP from OFIS used to give more explanations to farmers about income diversification and farm management</p>	<p>Olam FDP is explained to all farmers in our sustainability program</p>

<p>for production. They need to take debt to cover basic needs.</p>	<p><b>FLA Principle 8: Timely and Preventive Remediation</b>  <b>Benchmark 8.2, KPI c:</b>  The company should supplement remediation efforts by engaging with appropriate stakeholders to address systemic issues and find solutions in a way that is consistent with the FLA standards</p>	<p>Include the agenda of labor standards, pricing etc. in Olam meetings with the National Cocoa and Coffee Board (NCCB) and Interprofessional Council for Cocoa and Coffee (CICC) along with two other main buyers.</p>	<p>Olam Cam to interact with CICC and two main buyers about labor standards, pricing etc.</p>	<p>Olam meetings with CICC and two main buyers in the regular basis based on their willingness and availability</p>	<p>Concerted action put in place by the main actors of cocoa chain in Cameroon</p>
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