Independent External Monitoring Agriculture Report, 2025

Fair Labor Association conducts an Independent External Monitoring (IEM) assessment when a company has begun implementation of its internal monitoring and remediation program. An IEM allows the assessment of labor conditions at the farm level and first level processing if it overlaps with the farms based on the FLA Agriculture Workplace Code of Conduct and Monitoring Benchmarks for the Agriculture Sector**.** FLA gathers further data through community stakeholder interviews with civil society organizations, government officials, community leaders, and supply chain actors. FLA examines internal monitoring systems at the country level against FLA's Principles of Fair Labor and Responsible Sourcing for Agricultural Supply Chains.

Company	L'Oreal S.A.
Country	Philippines
Crop	Coconut
Production process	Harvesting Coconuts (climbing and cutting the bunch of coconuts), Husking (removing coconut husk), De-shelling and Splitting Nuts, Drying Copra (coconut meat)
Assessment location	Negros Oriental (Basay, Lazi, Pamplona, Santa Catalina, Siquijor)
Monitor	Chi Cuong Le
Assessment dates	March 23 - 30, 2025
Number of assessed farms	163
Total area covered	142.68 acre
Number of farmers interviewed	163
Total number of workers	NA
Number of workers interviewed	9

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	Noncompliance	All Farms
Recruitment and Hiring	ER.3.1	Noncompliance	All Farms
	ER.3.1.1	Noncompliance	All Farms
	ER.3.1.2	Noncompliance	All Farms
	ER.4	In compliance	
	ER.5.1	In compliance	
	ER.5.2	In compliance	
	ER.5.3	In compliance	
	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	Noncompliance	All Farms
	ER.7.7	In compliance	
	ER.7.8	In compliance	
Terms and Conditions	ER.9.1	Noncompliance	All Farms
	ER.9.2.1	Noncompliance	All Farms
	ER.9.2.2	Noncompliance	All Farms
	ER.9.2.3	Noncompliance	All Farms
	ER.9.3.1	Noncompliance	All Farms
	ER.9.3.2	Noncompliance	All Farms
	ER.9.3.3	Noncompliance	All Farms
	ER.10	Not Applicable	
	ER.11	Noncompliance	All Farms
	ER.12.1	Noncompliance	All Farms
	ER.12.1.1	Noncompliance	All Farms
	ER.12.2	Not Applicable	
	ER.13.1	Noncompliance	All Farms
Administration	ER.15.1	Not Applicable	
	ER.15.2	Not Applicable	
	ER.15.2.1	Not Applicable	
	ER.16.1	In compliance	
	ER.16.2	In compliance	
Worker Involvement	ER.18.1	In compliance	
Right to Organize and Bargain	ER.19	Not Applicable	
Work Rules and Discipline	ER.20.1	Noncompliance	All Farms
	ER.20.2	Noncompliance	All Farms
	ER.20.4	Noncompliance	All Farms
	ER.20.6	Noncompliance	All Farms
	ER.20.7	Not Applicable	
	ER.20.8	Not Applicable	
	ER.20.11	Noncompliance	All Farms
Access to Training for Family Members	ER.21	In compliance	
HSE Management System	ER.24.1.	Noncompliance	All Farms
	ER.24.3	Noncompliance	All Farms
Grievance Procedures	ER.25.3	Noncompliance	All Farms
	ER.25.4	Noncompliance	All Farms

Employment Relationship Assessment Summary

Human Resource Management System	
Benchmarks	**Compliance Status**
ER.1.1: Employer shall have written terms and conditions of employment, job descriptions, rules of compensation, and working hours for all positions. In the case of workplaces with informal labor structures, employers should be able to describe verbally all of the above terms and conditions and clearly communicate them to workers.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Farmers (employers) often lack written terms and conditions of employment, job descriptions, rules of compensation, and guidelines for working hours for their workers. As farmers also employ seasonal workers (through informal labor structures), they need to describe all the above terms and conditions verbally and communicate them clearly to all workers, which farmers have failed to do. Family member workers and labor exchanges with neighboring farmers may not require contracts; however, the terms should be clearly explained and agreed. Source: Interview
Company Action Plan	
Activity	1. Conduct Farmer Orientation & Training on how to verbally communicate terms and conditions of employment to seasonal and informal workers. 2. Conduct workshops (community awareness sessions) for farmers, family workers, and farmworkers to highlight the importance of clear agreements.
Output indicators (targeted results)	1. 100% of farmers trained and provided with job description and verbal agreement guide. 2. At least 80% of seasonal workers report clear understanding of employment terms. 3. Minimum of one (1) community awareness session conducted per month.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement Training of the Trainer (ToT) sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation (by profit-sharing), legal age for hiring workers, scope of work). Modules provided to all attendees. b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and

	farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Recruitment and Hiring	
Benchmarks	**Compliance Status**
ER.3.1: Employers shall verify proof of age documentation for all young workers in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers. *ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.* *ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.* *ER.7: Employers may hire temporary, casual, daily, seasonal or migrant workers only when:* *ER.7.6: contract, temporary, casual, daily, seasonal or migrant workers receive at least the minimum wage or the prevailing industry wage whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave and holiday pay;*	**Noncompliance in all farms**
Findings/Noncompliance Explanation	There are no written procedures or policies for the recruitment process; hiring is primarily conducted through verbal requests by farmers. Even when farmers are exchanging labor (working days) or asking family members to work on coconut farms, the ages should be checked for young workers unless the farmers are certain of their ages and the conditions under which these young workers can work. Nine farmworkers reported working between 7 and 12 hours per day during the harvest season, between 3 to 6 days per week. Wages were based on output rather than fixed daily rates; workers usually received a portion of the farmer's total income, typically ranging from one-third to one-half, depending on regional practices. The minimum wage payments to any workers could not be fully verified without the records, however, reported earnings suggests the gap. The reported earnings varied from PHP 1,500 (USD 27) to PHP 3,000 (USD 54) per harvest season, which translates to approximately PHP 250 (USD 4.50) to PHP 500 (USD 9.00) per day. Comparing these figures to the statutory daily minimum wage of PHP 453 (USD 8.16) for an 8-hour workday in the region reveals a significant compliance gap in labor remuneration during peak agricultural periods. Additionally, farmers are not aware of the legal minimum wage. There are no different wages or benefits based on the type of worker or activity. Source: Interview
Company Action Plan	
Activity	1. Conduct farmer orientation and training on legal hiring practices, age verification, and wage compliance based on local and national laws, which set minimum age thresholds, and regulate working conditions. Training materials will incorporate a practical calculation tool that enables farmers to compute and cross-check wages under different schemes—unit-based, output-based, and revenue-sharing—to ensure compliance with legal minimum wage requirements.
Output indicators (targeted results)	1. 100% of farmers trained and provided with recruitment checklist, ID verification guide, and guidance on legal minimum wage computation from various pay schemes.
Timeline and Deadline Date	Next Steps (2026):

	- Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Printing of training materials Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation (by profit-sharing), legal age for hiring workers, scope of work). Modules provided to all attendees b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement c. Prevailing practice for compensation is thru profit-share, with different set-up per barangay (50/50, 2/3-1/3), documented thru "pisada", however documentation is inconsistent at farm level. Meals are provided per agreement of farmer and farmworker and this is not deducted in the total profit share due the farmworker/s. d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Terms and Conditions

Benchmarks	Compliance Status
ER.9.1: Workers should be made aware of the employment terms under which they are engaged. *ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:* *ER.9.2.1: provisions of national laws;* *ER.9.2.2: freely negotiated and valid collective bargaining agreements; or* *ER.9.2.3: the FLA Workplace Code.* *ER.9.3: There can be no employment terms (including in written or verbal contracts or any other instruments or in any formal or informal recruitment arrangements) which allow employers:* *ER.9.3.1: to hold wages already earned; or* *ER.9.3.2: use earned back wages as penalties; and* *ER.9.3.3: in any way punishes workers for terminating employment.* *ER.11: Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant or disabled workers, are implemented.*	**Noncompliance in all farms**

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. *ER.12.1.1: Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.* *ER.13.1: Farmer, sharecropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.*	
Findings/Noncompliance Explanation	ER.9.1: Farmers do not provide any training or communication to ensure that workers are aware of the relevant terms and conditions of their employment, such as length of service, responsibilities, hours of work, and compensation. Given the specialized skills of harvesters (climbers), farmers rely on the existing relationship/ previously-hired climbers, leading to neglect to communicate the terms and conditions. ER.9.2.1, 9.2.2, 9.2.3, ER.9.3.1, 9.3.2, 9.3.3: Farmers do not have written terms and conditions of employment, job descriptions, rules of compensation, or working hours for all positions because they rely on hiring the workers with long-standing employment relationships although the work is seasonal. Thus, they fail to verbally communicate all of the above terms and conditions to workers, as required by law and FLA benchmarks. *Note: The finding above only pertains to farms that reported using seasonal and family workers.* ER.11: All farmers are unaware of the legally mandated requirements for special categories of workers. No special workers were observed or reported during the onsite visit. ER.12.1: Workplace rules and labor standards and associated disciplinary policies, such as training and informational materials, are not in place. ER.12.2: Workers are not informed about the disciplinary policies and how they apply to harassment or abuse by farmers. *Note: A few farmers employ seasonal workers and family workers.* ER.13.1: Farmers lack awareness of applicable local laws on employment and labor standards. Their primary focus is on improving coconut production and quality. Source: Interview
Company Action Plan	
Activity	1. Conduct farmer workshop and awareness training on legal employment terms, wage protection, and worker rights, and the importance of communicating these to workers. The workshop shall provide role-play and participatory exercises to facilitate better communication and confidence building for farmers. 2. Assist farmers in conducting orientation and onboarding of farmworkers during harvest season. Written handouts to supplement verbal explanation. 3. Posters (place in common areas) and flyers (distributed to farmers and farmworkers)in local languages (Bisaya/Filipino) covering workplace rules, health & safety, compensation, working hours, freedom of association, and applicable FLA Code basics shall be disseminated to the supply base.
Output indicators (targeted results)	1. 100% of farmers attend workshop and awareness training and equipped. 2. Posters and flyers placed and distributed to 100% of workplaces/farms, cooperatives and traders. 3. Process in place to systemically repeat training and awareness-raising material dissemination, as needed
Timeline and Deadline Date	Next Steps (2026):

	- Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Printing of training materials Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation (by profit-sharing), legal age for hiring workers, scope of work). Modules provided to all attendees. b.During interview of farmers and farmworkers, noted information that Working hours varies based on verbal agreement between farm owner and farmer/s, payment scheme is also verbally agreed before start of harvest. No documented agreement on work arrangement and payment scheme but the total price of coconut sold is being documented thru use of "pisada", issued by the traders/buyer which is presented to both farm owner and farmer/s, though not consistently being kept by both parties c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Work Rules and Discipline	
Benchmarks	**Compliance Status**
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). *ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.* *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.* *ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.* *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.*	**Noncompliance in all farms**

Findings/Noncompliance Explanation	ER.20.1, 20.2, 20.4, 20.6, and 20.11: There is no disciplinary rules at farm level for the workers. No training and communication about the disciplinary rules are carried out by farmers. Source: Interview
Company Action Plan	
Activity	1. Conduct workshops on fair disciplinary practices, grievance handling, and worker rights. 2. Develop a simple, farmer-friendly disciplinary rules document aligned with FLA standards and local labor law. Ensure rules prohibit discrimination, harassment, and abusive practices, and emphasize progressive discipline (warnings before termination). 3. Integrate disciplinary rules into worker orientation and onboarding sessions.
Output indicators (targeted results)	1. All farmers are trained on fair disciplinary practices, grievance handling, and worker rights. 2. Farmer-friendly disciplinary rules developed in line with FLA standards and local labor law. 3. Disciplinary rules integrated into worker orientation and onboarding.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Printing of training materials Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. Grievance process included in the RGI training module delivered by DUCOM, framework based on the internal grievance mechanism of DUCOM, There is no defined grievance/disciplinary process at the farm level. However, during interview it was noted that there are local peace and order committee at the community (barangay) level where investigation and intervention of the community leaders are made. b. Addition in the training module is the local emergency and helpline numbers (Emergency services, PNP WCPC, InterAgency Council on VAWC, Safe spaces assistance, Anti-cybercrime group), shared during the training and copies provided to attendees.

	c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

HSE Management System	
Benchmarks	**Compliance Status**
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. *ER.24.3: Employers shall have a designated responsible person for HSE issues on the farm. For small farms, this could be the responsibility of the farmer directly.*	**Noncompliance in all farms**
Findings/Noncompliance Explanation	ER.24.1: The HSE rules are not communicated to all workers by farmers. ER.24.3: There is no designated person responsible for the HSE issue at the farm, as most farmers manage their own farms. Farmers should be aware of his/her responsibilities. Source: Interview
Company Action Plan	
Activity	1. Develop HSE guidelines covering topics such as safe climbing/harvesting practices, use of tools, hydration, first aid, and emergency response. 2. Train Cooperative and community-based farmer association leaders/volunteers as HSE officers and trained trainers to deliver trainings and provide shared support to the farmers. 3. Conduct seasonal (harvest season) HSE awareness briefings for workers and integrate this in onboarding for new workers.
Output indicators (targeted results)	1. 100% of Cooperatives and traders in the L'Oreal supply base with posted HSE guidelines. 2. 50% of farms with designated HSE Officers cum Trained Trainers 3. At least 50% of workers undergone HSE awareness briefings
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer

Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH
Status	Progress as of 18 September 2026 a. Updated the RGI and ECOREAP training modules to cover other Health, Safety and Environment aspects such as identification of common workplace accidents and emergencies, chemical handling and storage, tools handling and emergency response. Emergency contact numbers for each barangay(the smallest administrative division and basic local government unit in the Philippines) included in the training module provided to all attendees b. Common to all farmers/farmworkers interviewed, no HSE program at farm level. Health and safety programs , including handling of incidents and accidents, are managed by the community (barangay) health workers (BHW) once reported. c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Grievance Procedures	
Benchmarks	**Compliance Status**
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 in the event that the local and farm level grievance redress mechanisms fail to sufficiently address the issue. *ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service providers and suppliers.*	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Formal grievance procedures are absent at farm-level. The grievance procedure of the coconut oil processing company was not shared with or made available for farmers and farmworkers. As a result, no one could articulate how or where to raise a grievance if needed. There is a need for grievance mechanisms at farm-level, which needs to be developed, disseminated, and supported (e.g., guidance on how to submit grievances, either through physical channels or any communication platforms). Source: Interview
Company Action Plan	
Activity	1. Revise DUCOM Grievance Policy to integrate upstream supply chain, which would include farmers and farmworkers. A grievance flowchart/reporting guide shall include multiple channels (grievance boxes, hotline number and SMS channels, verbal) with anonymity and non-retaliatory guarantees. 2. Conduct workshops on how to use the grievance mechanism. 3. Train cooperative & association leaders as trainers and grievance focal points
Output indicators (targeted results)	1. Revised DUCOM Grievance Policy 2. Workshops conducted on using the grievance mechanism. 3. Cooperative and association leaders are trained as grievance focal points and trainers.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship module, revised the grievance policy, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops.

	- May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, posters and flyers Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Grievance Committee Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. Grievance process included in the RGI training module delivered by DUCOM, framework based on the internal grievance mechanism of DUCOM, There is no defined grievance/disciplinary process at the farm level. However, during interview it was noted that there are local peace and order committee at the community (barangay) level where investigation and intervention of the community leaders are made. b. Addition in the training module is the local emergency and helpline numbers (Emergency services, PNP WCPC, InterAgency Council on VAWC, Safe spaces assistance, Anti-cybercrime group), shared during the training and copies provided to attendees. c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Non-discrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Risk of Noncompliance	All Farms
Recruitment and Employment Practices	ND.2.1	Risk of Noncompliance	All Farms
	ND.2.2	Risk of Noncompliance	All Farms
	ND.2.3	Risk of Noncompliance	All Farms
Compensation Discrimination	ND. 3	In compliance	
Discrimination in Training and Communication	ND. 4	In compliance	

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	
Benchmarks	**Compliance Status**
ND.1: Employers shall comply with all national laws, regulations and procedures concerning non-discrimination.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Not all farmers are fully aware of local laws, regulations, legal procedures related to harassment and abuse. In addition, their understanding of what constitutes harassment and abuse (e.g., verbal threats, physical punishment, or other harsh actions used to enforce labor discipline) is minimal. This lack of awareness may contribute to a normalization of inappropriate behavior in the workplace and hinder the promotion of a safe and respectful working environment. Source: Interview
Company Action Plan	
Activity	1. Conduct farmer training on Philippine laws on non-discrimination - Anti-Sexual Harassment Act, Safe Spaces Act, Labor Code provisions) and FLA standards.
Output indicators (targeted results)	100% participating farmers were trained on Philippine laws and FLA standards on non-discrimination, including the Anti-Sexual Harassment Act, Safe Spaces Act, and relevant Labor Code provisions.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Gender Sensitivity module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team

	Cooperative/Farmer Association Trained Trainer Legal Compliance Advisor / Labor Standards Specialist (external resource person like)
Status	Progress as of 18 September 2026 a. Grievance process should any parties (farmer/farmworker) experience or be subjected to any incident of harassment, abuse or discrimination included in the RGI training module delivered by DUCOM, framework based on the internal grievance mechanism of DUCOM, There is no defined grievance/disciplinary process at the farm level. However, during interview it was noted that there are local peace and order committee at the community (barangay) level where investigation and intervention of the community leaders are made. b. During the interviews, no actual case of harassment or abuse reported by any farmers and farmworkers, with no recollection if there had been any incident in recent times. As farmers and farmworkers live within the same community, good working relationships are ensured by both parties. c. Addition in the training module is the local emergency and helpline numbers (Emergency services, PNP WCPC, InterAgency Council on VAWC, Safe spaces assistance, Anti-cybercrime group), shared during the training and copies provided to attendees. d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Recruitment and Employment Practices	
Benchmarks:	**Compliance Status**
ND.2.1: Recruitment and employment practices shall be free from any type of discrimination. *ND.2.2: Employment policies and practices, including job advertisements, job descriptions, and job performance/evaluation policies and practices shall be free from any type of discriminatory bias.* *ND.2.3: If not provided by law, employers must provide protection to workers who allege any type of discrimination in recruitment and employment practices.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Farmers often lack a non-discrimination policy and struggle to understand the concept of non-discrimination in recruitment and employment. Due to the physical demands and special skills of the work on the coconut farm, particularly tasks such as climbing to harvest coconuts, the majority of seasonal job seekers and hires are male. Compensation for seasonal workers is determined by the nature of the tasks performed and the number of hours worked, irrespective of gender or migration status. Furthermore, no evidence of discriminatory practices was observed or reported by workers during the assessment. Source: Interview
Company Action Plan	
Activity	1. Conduct training on Gender Sensitivity to equip farmers with the understanding and mindset to foster respect, inclusivity, and dignity at work.
Output indicators (targeted results)	100% participating farmers were trained on Gender Sensitivity, fostering awareness and commitment to respect, inclusivity, and dignity at work.
Timeline and Deadline Date	Next Steps (2026):

	- Jan–Apr: Finalize the Employment Relationship and Gender Sensitivity module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer Legal Compliance Advisor / Labor Standards Specialist (external resource person like)
Status	Progress as of 18 September 2026 a. Grievance process should any parties (farmer/farmworker) experience or be subjected to any incident of harassment, abuse, or discrimination included in the RGI training module delivered by DUCOM, framework based on the internal grievance mechanism of DUCOM, There is no defined grievance/disciplinary process at the farm level. However, during interview it was noted that there are local peace and order committee at the community (barangay) level where investigation and intervention of the community leaders are made. b. During the interviews, no actual case of harassment or abuse reported by any farmers and farmworkers, with no recollection if there had been any incident in recent times. As farmers and farmworkers live within the same community, good working relationships are ensured by both parties. c. Addition in the training module is the local emergency and helpline numbers (Emergency services, PNP WCPC, InterAgency Council on VAWC, Safe spaces assistance, Anti-cybercrime group), shared during the training and copies provided to attendees. d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Risk of Noncompliance	All Farms
	H/A.1.2	In Compliance	
Discipline	H/A.2	Risk of Noncompliance	All Farms
	H/A.3	Risk of Noncompliance	All Farms
	H/A.4	Risk of Noncompliance	All Farms
	H/A.5	Risk of Noncompliance	All Farms
	H/A.6	Risk of Noncompliance	All Farms
	H/A.7	Risk of Noncompliance	All Farms
	H/A.13	Risk of Noncompliance	All Farms
Violence	H/A.8.1	In Compliance	
	H/A.8.2	In Compliance	
	H/A.8.3	In Compliance	
Sexual Harassment	H/A.9.1	In Compliance	
	H/A.9.2	In Compliance	
	H/A.9.3	In Compliance	
	H/A.9.4	In Compliance	
Security Practices	H/A.10	Not Applicable	
	H/A.10.1	Not Applicable	
	H/A.10.2	Not Applicable	

Harassment or Abuse Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
H/A.1.1: Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment or abuse.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	The assessment showed that farmers have a limited understanding of local laws, regulations, and legal procedures related to harassment and abuse. Additionally, their awareness of what constitutes harassment and abuse, such as verbal threats, physical punishment, or other harsh actions used to enforce labor discipline, is minimal. This lack of knowledge may contribute to a normalization of inappropriate behavior in the workplace and hinder the creation of a safe and respectful working environment. Source: Interviews
Company Action Plan	
Activity	1. Conduct farmer training on national laws and FLA standards regarding harassment and abuse, and a module that introduces positive discipline practices that focus on improvement in creating a safe and respectful working environment. 2. Conduct Gender Sensitivity Orientation for Farmers
Output indicators (targeted results)	1. Farmers trained on national laws, FLA standards, and positive discipline, with a training module created to promote a safe and respectful working environment. 2. Farmers oriented on gender sensitivity, with improved awareness of harassment and abuse in all settings.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Gender Sensitivity module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops.

	- May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. Grievance process should any parties (farmer/farmworker) experience or be subjected to any incident of harassment, abuse or discrimination included in the RGI training module delivered by DUCOM, framework based on the internal grievance mechanism of DUCOM, There is no defined grievance/disciplinary process at the farm level. However, during interview it was noted that there are local peace and order committee at the community (barangay) level where investigation and intervention of the community leaders are made. b. During the interviews, no actual case of harassment or abuse reported by any farmers and farmworkers, with no recollection if there had been any incident in recent times. As farmers and farmworkers live within the same community, good working relationships are ensured by both parties. c. Addition in the training module is the local emergency and helpline numbers (Emergency services, PNP WCPC, InterAgency Council on VAWC, Safe spaces assistance, Anti-cybercrime group), shared during the training and copies provided to attendees. d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Discipline	
Benchmarks	**Compliance Status**
H/A.2: Employers shall not use monetary fines and penalties as a means to maintain labor discipline, including for poor performance or for violating employer rules, regulations, and policies. *H/A.3: Access to food, water, toilets, medical care or health clinics or other basic necessities shall not be used as either reward or as a means to maintain labor discipline.* *H/A.4: Employers shall not use any form of – or threat of – physical violence, including slaps, pushes or other forms of physical contact as a means to maintain discipline of workers, disregarding whether they are family members without a formal contract or hired staff.* *H/A.5: Employers shall not use any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain discipline, disregarding whether they are family members without a formal contract or hired staff.* *H/A.6: Employers shall not use any form – or threat – of psychological abuse, such as forcing workers to sign letters of self-criticism or posting names of workers subject to disciplinary measures as a means to maintain discipline, disregarding whether they are family members without a formal contract or hired staff.*	**Risk of Noncompliance in all farms**

H/A.7: Employers shall not unreasonably restrain the freedom of movement of workers, including movement in canteens, during breaks, using toilets, accessing water, or accessing necessary medical attention, as a means to maintain discipline. *H/A.13: Employers shall only apply corrective measures and discipline which are well explained to workers and are with the intention of continuous improvement*	
Findings/Noncompliance Explanation	The farmers do not understand what constitutes harassment and abuse, including any kind of restriction or prohibition applied to maintain labor discipline. No kind of restriction on the use of facilities, reduction of salaries, or any physical/verbal/psychological abuse has been applied as disciplinary measures reported by workers during the assessment. Source: Interviews
Company Action Plan	
Activity	1. Conduct farmer training on national laws and FLA standards regarding harassment and abuse, and a module that introduces positive discipline practices that focus on improvement in creating a safe and respectful working environment. 2. Conduct Gender Sensitivity Orientation for Farmers
Output indicators (targeted results)	1. Farmers trained on national laws, FLA standards, and positive discipline, with a training module created to promote a safe and respectful working environment. 2. Farmers oriented on gender sensitivity, with improved awareness of harassment and abuse in all settings.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Gender Sensitivity module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. Grievance process should any parties (farmer/farmworker) experience or be subjected to any incident of harassment, abuse or discrimination included in the RGI training module delivered by DUCOM, framework based on the internal grievance mechanism of DUCOM, There is no defined grievance/disciplinary process at the farm level. However, during interview it was noted that there are local peace and order committee at the community (barangay) level where investigation and intervention of the community leaders are made. b. During the interviews, no actual case of harassment or abuse reported by any farmers and farmworkers, with no recollection if there had been any incident in

	recent times. As farmers and farmworkers live within the same community, good working relationships are ensured by both parties. c. Addition in the training module is the local emergency and helpline numbers (Emergency services, PNP WCPC, InterAgency Council on VAWC, Safe spaces assistance, Anti-cybercrime group), shared during the training and copies provided to attendees. d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Forced Labor

Compliance Status

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

Forced Labor Assessment Summary

Work of Family Members	
Benchmarks	**Compliance Status**
F.6.1: Spouses and adult children of hired workers are not required to work, unless voluntarily contracted. *F.6.2: Employers shall not make the employment of a worker or an offer of housing conditional on the employment or their spouses.* *F.6.3: If more than one member from the same family/household is hired by the employer/producer on the same farm, each one should have separate contract with no linkage to other members.* *F.6.4: Farm owners' spouses and adult children have the right to work elsewhere.*	**Risk of Noncompliance in all farms**

Findings/Noncompliance Explanation	The farmers and their family workers do not have any kind of contract, they mostly negotiate on salary for the tasks to be completed. In addition, some workers are hired as a group (e.g., a climber and a few workers to remove husk and load and transport coconuts) and their wage distribution arrangement is unclear. Source: Interview
Company Action Plan	
Activity	1. Conduct training and orientation on voluntary work principles, rights of family members (work is a choice, not an obligation) in line with FLA standards and Philippine Labor Law. The training will also incorporate a simple calculation tool to enable farmers to record how wages are divided (group-based arrangements) among climbers, huskers, loaders, etc. under different schemes—unit-based, output-based, and revenue-sharing.
Output indicators (targeted results)	1. 100% of farmers trained and provided with guides (wage distribution) and flyers on 'Fair work for families'.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module on Fair work for families Posters and flyers Wage distribution guide for group-based arrangements
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. Per interviews conducted, there is no formal documentation of the pricing and payment process. Information on the total weight of harvested copra and the corresponding total price and profit share is exchanged verbally (either 50/50 or 2/3-1/3). The current practice of documenting involves the use of a piece of paper (pisada) provided by the traders, detailing this information and serving as proof of payment acknowledged by all parties. It was noted during interviews that not all the farmer nor the farmworker retains copies of all these slips as records are with the traders/cooperatives. b. Other arrangements such as meals are verbally agreed as well by the farmers and farmworkers before work starts. Potable water is readily available and provided by the farmers. These are not deducted to the farmworkers' final pay share c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each

	community. Revised training delivery program to be implemented starting October scheduled training

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	All Farms
Minimum Age	CL.2	Risk of Noncompliance	All Farms
Light Work	CL.3	Risk of Noncompliance	All Farms
Young Workers	CL.5	Risk of Noncompliance	All Farms
	CL.6.1	Risk of Noncompliance	All Farms
	CL.6.2	Risk of Noncompliance	All Farms
	CL.7	Risk of Noncompliance	All Farms
Children on Premises	CL.9	In compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	Risk of Noncompliance	All Farms

Child Labor Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
Cl.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	All farmers do not clearly know the national laws and international conventions on child labor that are applicable to the farms. Source: Interviews
Company Action Plan	
Activity	1. Develop and Disseminate Child Labor Awareness Materials on national laws RA 9231 and international conventions ILO 138 & 182) 2. Conduct Training and Community Awareness Sessions
Output indicators (targeted results)	1. 100% of farmers receive materials (guides, flyers) 2. Farmer Training and awareness sessions (Jan 2026 -Dec 2026) 12 Trained Trainers conduct 4 trainings monthly (30 trainees/session) to 1,000 farmers (66 sessions)
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance).

	- Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module on Child Labor Law, Posters and flyers Child Labor Remediation Protocol guide Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. During the interviews, No children of minor age being employed as farmworkers for all the farmers and farmworkers interviewed. The farmers and farmworkers were able to demonstrate understanding the reason why child labor is discouraged, even for family members. Also, since school has already started , no children or minors present at the farms visited doing work. b. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes c. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Minimum Age	
Benchmarks	**Compliance Status**
CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to progressively raise the minimum age to 15 years.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	While not observed, twelve farmers said during peak harvesting periods, their children aged 14 years old and below, and some between 15 and 17 years old are involved in coconut farming activities. Source: Interviews
Company Action Plan	
Activity	1. Conduct farmer orientation sessions on minimum age laws, safe engagement of young workers, and progressive compliance goals in line with RA 9231 (An Act Providing for the Elimination of the Worst Forms of Child Labor and Affording Stronger Protection for the Working Child) and ILO Conventions 138 (Minimum Age Convention) & 182 (Worst Forms of Child Labour Convention), and the UN Convention on the Rights of the Child.
Output indicators (targeted results)	1. 100% of farmers received materials (guides, flyers) 2. All farmers are oriented on minimum age laws, safe engagement of young workers, and progressive compliance requirements in line with RA 9231, ILO Conventions 138 and 182, and the UN Convention on the Rights of the Child.

Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module on Child Labor Law, Posters and flyers Child Labor Remediation Protocol guide Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. During the interviews, No children of minor age being employed as farmworkers for all the farmers and farmworkers interviewed. The farmers and farmworkers were able to demonstrate understanding the reason why child labor is discouraged, even for family members. Also, since school has already started , no children or minors present at the farms visited doing work. b. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes c. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Immediate Family Members	
Benchmarks	**Compliance Status**
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, and specifically* • *should not involve use of or exposure to chemicals,* • *should not involve carrying heavy loads (children should not lift loads more than 15% of their body weight at any time),* • *should not involve the use of farm equipment, dangerous tools, ploughs, tractors, machetes, sharp tools, saws, or power engines,* • *should not involve working on heights (not more than 6 feet) such as in trees or on ladders, or in confined places such as silos or storage areas, and* • *should not involve strenuous work and extreme conditions such as standing or bending for several hours, working in high temperatures, and not having breaks.* *The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays. Specifically:* • *working hours should not exceed 14 hours per week,* • *no work should take place before 6:00 am and after 8:00 pm, and*	**Risk of Noncompliance in all farms**

• *there should be at least one full day (24 hours) rest per week.* *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 and maintain all documents as required by the law.* *Other criteria specific to in-scope commodities or as defined by the national government in the country, that are not lower that the ILO standard on light work.*	
Findings/Noncompliance Explanation	The farmers, family workers, and child laborers do not understand the concept of light work. There is no child found during the assessment day, the historical child labor is reported during the farmer interview. Source: Interviews
Company Action Plan	
Activity	1. Conduct farmer orientation sessions on minimum age laws, safe engagement of young workers, and progressive compliance goals in line with RA 9231 (An Act Providing for the Elimination of the Worst Forms of Child Labor and Affording Stronger Protection for the Working Child) and ILO Conventions 138 (Minimum Age Convention) & 182 (Worst Forms of Child Labour Convention), and the UN Convention on the Rights of the Child.
Output indicators (targeted results)	1. 100% of farmers received materials (guides, flyers) 2. All farmers are oriented on minimum age laws, safe engagement of young workers, and progressive compliance requirements in line with RA 9231, ILO Conventions 138 and 182, and the UN Convention on the Rights of the Child.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module on Child Labor Law, Posters and flyers Child Labor Remediation Protocol guide Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. During the interviews, No children of minor age being employed as farmworkers for all the farmers and farmworkers interviewed. The farmers and farmworkers were able to demonstrate understanding the reason why child labor is discouraged, even for family members. Also, since school has already started , no children or minors present at the farms visited doing work.

	b. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes c. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Young Workers	
Benchmarks	**Compliance Status**
CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. *CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.* *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.* *CL.5: Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment of young workers.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	CL.6.1, CL.6.2. and CL.7. : There is no child found during the assessment day. However, historical child/young labor is reported during farmer interviews: the young workers (ages 15–17) and aged 14 were found to be involved in hazardous and/or heavy work on coconut farms. The young workers were said to be engaged in lifting and carrying heavy loads (e.g., sacks of copra); exposure to physical risks, including sharp tools and falling coconuts; long hours under extreme heat without adequate rest or protection. Source: Interviews
Company Action Plan	
Activity	1. Conduct farmer orientation sessions on minimum age laws, safe engagement of young workers, and progressive compliance goals in line with RA 9231 (An Act Providing for the Elimination of the Worst Forms of Child Labor and Affording Stronger Protection for the Working Child) and ILO Conventions 138 (Minimum Age Convention) & 182 (Worst Forms of Child Labour Convention), and the UN Convention on the Rights of the Child.
Output indicators (targeted results)	1. 100% of farmers received materials (guides, flyers) 2. All farmers are oriented on minimum age laws, safe engagement of young workers, and progressive compliance requirements in line with RA 9231, ILO Conventions 138 and 182, and the UN Convention on the Rights of the Child.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.

Input (budget/resources)	Training Module on Child Labor Law, Posters and flyers Child Labor Remediation Protocol guide Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. During the interviews, No children of minor age being employed as farmworkers for all the farmers and farmworkers interviewed. The farmers and farmworkers were able to demonstrate understanding the reason why child labor is discouraged, even for family members. Also, since school has already started , no children or minors present at the farms visited doing work. b. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes c. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Removal and Rehabilitation of Child Laborers	
Benchmarks	**Compliance Status**
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.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	While there is no cases are found, there is no formal mechanism in place to address or remediate instances of child labor on the farms. While the coconut oil processing company has established a Responsible Sourcing Policy and Supplier Code of Conduct, it does not define a process for removal and rehabilitation of child in the supply chain. Source: Interviews
Company Action Plan	
Activity	1. Develop and Formalize a Child Labor Remediation Protocol - Draft a clear, written procedure aligned with FLA standards and RA 9231/ILO Conventions. - Define steps for immediate removal of the child from hazardous work, referral to education, and family support. 2. - Train Farmers, Cooperatives, and Supply Chain Intermediaries - Conduct workshops on identifying child labor risks and applying the remediation protocol. - Train cooperative leaders as focal persons to handle cases and coordinate with local authorities, schools, and NGOs. - Provide guidance on non-retaliation and confidentiality.
Output indicators (targeted results)	1. A formal, written Child Labor Remediation Protocol is developed and adopted. The protocol clearly outlines procedures for child removal, education referral, and family support. It is validated and distributed to relevant stakeholders.

	2. 20 Representatives from Farmers, Cooperative Leaders, and Supply Chain Intermediaries are trained on Identifying Child Labor Risks and Applying the remediation Protocol (May 2026 -August 2026) 3. 100% of farmers, cooperatives, and Supply Chain Intermediaries are oriented and provided with guides and flyers on Child Labor Remediation Protocol. - 12 Trained Trainers conduct 4 trainings monthly (30 trainees/session) to 1,000 farmers (66 sessions) - Cooperative leaders designated as focal persons to handle cases.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Child Labor module, Development of Child Labor Remediation Protocol , refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance), and Adaptation of Child Labor Remediation Protocol. - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module on Child Labor Law, Posters and flyers Child Labor Remediation Protocol guide Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. During the interviews, No children of minor age being employed as farmworkers for all the farmers and farmworkers interviewed. The farmers and farmworkers were able to demonstrate understanding the reason why child labor is discouraged, even for family members. Also, since school has already started , no children or minors present at the farms visited doing work. b. However, there is no defined child remediation policy defined as of the last field visit. Applicable requirements are mostly cascaded thru the trainings conducted by DUCOM. c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Freedom of Association and Collective Bargaining

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	FOA.1	Noncompliance	All Farms
Right to Freely Associate	FOA.2	In compliance	
	FOA.3	Not Applicable	
	FOA.8	In compliance	
	FOA.20	Not Applicable	
Anti-Union Behaviour	FOA.4	In compliance	
	FOA.5.1	In compliance	
	FOA.5.1.1	In compliance	
	FOA.6	In compliance	
Union Representatives	FOA.7	Not Applicable	
Employer Interference	FOA.9.1	In compliance	
	FOA.9.2	In compliance	
	FOA.9.3	In compliance	
	FOA.9.4	In compliance	
	FOA.10	In compliance	
Collective Bargaining	FOA.12.1	In compliance	
	FOA.12.2	In compliance	
	FOA.13.2	In compliance	
	FOA.13.3	In compliance	
	FOA.14	In compliance	
	FOA.15	In compliance	
	FOA.16.1	In compliance	
	FOA.16.2	In compliance	
Right to Strike	FOA.18	In compliance	
	FOA.19	In compliance	

Freedom of Association and Collective Bargaining Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
FOA.1: Employers shall comply with all national laws, regulations and procedures concerning freedom of association and collective bargaining. In countries where no formal union exist, employers shall respect freedom of association and collective bargaining which apply to representative worker organizations elected and recognized by workers working on the farm or in the region.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	All farmers and workers are lack of awareness regarding labor rights, relevant national laws, and collective bargaining agreements (CBAs) related to compensation and employment conditions. No independent labor unions or farmers' associations were found among the evaluated farms. All workers interviewed were engaged as seasonal laborers, a condition that significantly hinders unionization efforts due to the transient nature of their employment. Source: Interview
Company Action Plan	
Activity	1. Develop training module covering Freedom of Association & Collective Bargaining Basics, awareness materials (leaflets and posters) 2. Conduct training sessions on labor rights, freedom of association, and collective bargaining agreements (CBAs). 3. Develop cooperative/association level representation of seasonal workers
Output indicators (targeted results)	100% of participating farmers were trained on labor rights, freedom of association, and collective bargaining basics, with awareness materials distributed and cooperative-level representation for seasonal workers established.

Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. During the interviews, No children of minor age being employed as farmworkers for all the farmers and farmworkers interviewed. The farmers and farmworkers were able to demonstrate understanding the reason why child labor is discouraged, even for family members. Also, since school has already started , no children or minors present at the farms visited doing work. b. However, there is no defined child remediation policy defined as of the last field visit. Applicable requirements are mostly cascaded thru the trainings conducted by DUCOM. c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	All Farms
Document Maintenance, Permits and Certificates	HSE.3.1	Noncompliance	All Farms
Evacuation Requirements and Procedure	HSE.5.2	Risk of Noncompliance	All Farms

Personal Protective Equipment	HSE.8	Risk of Noncompliance	All Farms
Chemical Management	HSE.9.1	Risk of Noncompliance	All Farms
	HSE.9.2	In compliance	
	HSE.9.2.1	In compliance	
	HSE.10	Risk of Noncompliance	All Farms
	HSE.11.1	Risk of Noncompliance	All Farms
	HSE.11.2	Risk of Noncompliance	All Farms
Protection Reproductive Health	HSE.12.1	Risk of Noncompliance	All Farms
Infrastructure	HSE.17.1	In compliance	
Machinery Safety	HSE.14.1	Risk of Noncompliance	All Farms
	HSE.14.2	Risk of Noncompliance	All Farms
	HSE.14.3	Risk of Noncompliance	All Farms
	HSE.14.4	Risk of Noncompliance	All Farms
Ergonomics and Medical Facilities	HSE.16.2	Noncompliance	All Farms

Health Safety and Environment Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Farmers lack knowledge of the legal requirements for health, safety, and the environment, as mandated under the Philippines' occupational safety and health laws. Source: Interviews.
Company Action Plan	
Activity	1.Conduct literacy and awareness training on Philippine Occupational, Safety, and Health (OSH) laws and environmental standards. 2. Develop simplified HSE guide, including checklist for safety practices (safe climbing, PPE use, chemical handling), and protective accommodations for vulnerable groups like pregnant women and children under 18 years old on hazardous chemicals and substances. 3. Assign cooperative and smallholder coconut farmer association (community-level) HSE focal point and trained trainer. 4. Integrate HSE into grievance channels
Output indicators (targeted results)	1. All farmers are trained on OSH laws, environmental standards, and safe practices. 2. Simplified HSE guide and checklist developed, including protections for vulnerable groups. 3. HSE focal points assigned and trained in cooperatives and farmer associations. 4. HSE integrated into grievance channels for reporting hazards and unsafe practices.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops.

	- May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,
Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. Includes topics on women and children's rights regarding doing work, chemical handling, emergency preparedness. b. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes c. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Document Maintenance, Permits and Certificates	
Benchmarks	**Compliance Status**
HSE.3.1: Employers shall notify the relevant national and/or local authorities of all illnesses and accidents and environmental emergencies as required by applicable laws	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Farmers do not have a system that maintains and reports illnesses and accidents. Source: Interviews.
Company Action Plan	
Activity	1. Train farmers and cooperative/association leaders on incident reporting (Incident reporting module). 2. Establish cooperative/association level recordkeeping system. HSE focal point to be responsible for incident reporting (incident reporting form), and cooperative level log-book.
Output indicators (targeted results)	1. Farmers and cooperative/association leaders trained on incident reporting using the Incident Reporting Module. 2. Cooperative/association-level recordkeeping system established, including incident reporting forms and logbooks.

	- HSE focal points designated and capable of managing incident reporting and maintaining records.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,
Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. Includes topics on women and children's rights regarding doing work, chemical handling, emergency preparedness. b. Reporting of illness and accidents at farm level is informal, as for such instances, individuals who suffered are advised to report it to the barangay health centers for treatment, and in some cases, endorsement to local hospitals. c. Interviewed Barangay Health Workers to establish health, safety and wellbeing program being offered by the local communities to its residents. Noted presence of first aid kits and over the counter medications at the health centers, with logbook for monitoring of reported cases. One barangay interviewed also has their own ambulance vehicle. Nurses and First aiders are also appointed at each barangay and have designated zones to monitor for incidents of accidents and injuries d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Evacuation Requirements and Procedure	
Benchmarks	**Compliance Status**

HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Farms do not have formal emergency or evacuation plans in place; and both farmers and workers are unfamiliar with the appropriate emergency response procedures. No training on emergency evacuation and procedure has been conducted for both farmers and workers. Additionally, basic safety provisions such as first aid kits were not available on any of the farms visited. Source: Interviews.
Company Action Plan	
Activity	1. Develop Farm-Level Evacuation Plans to include clear steps for fire, chemical spill, severe weather, or medical emergencies. 2. Conduct training on evacuation plan and drill to cooperative/association HSE focal points/trainers. 3. Conduct training on evacuation plan and drill to farmers and farmworkers.
Output indicators (targeted results)	1. Farm-level evacuation plans developed. 2. HSE focal points/trainers trained and able to conduct evacuation drills. 3. All farmers and farmworkers trained and participated in evacuation drills.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,
Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. Includes topics on women and children's rights regarding doing work, chemical handling, emergency preparedness. b. At farm level, provisions for first aid is mainly made of medicines used by the household, typically over the counter medications (e.g. paracetamol, band-aid, etc). For illness or accidents which cannot be managed by these, persons go to the barangay health center, or nearest hospital.

	c. Interviewed Barangay Health Workers to establish health, safety and wellbeing program being offered by the local communities to its residents. Noted presence of first aid kits and over the counter medications at the health centers, with logbook for monitoring of reported cases. One barangay interviewed also has their own ambulance vehicle. Nurses and First aiders are also appointed at each barangay and have designated zones to monitor for incidents of accidents and injuries d. There is also a barangay disaster risk reduction management office (BDRRMO), as mandated by the government, who oversees programs on disaster preparedness and response at barangay level. They are also the one who established emergency evacuation protocols at the barangay level based on the hazard mapping. Education of all barangay residents is also being done by the office such as posters, information dissemination e. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes f. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Personal Protective Equipment	
Benchmarks	**Compliance Status**
HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	All workers reported that they had never received any formal training on the proper use and importance of personal protective equipment (PPE), which poses heightened risks of injury and illness during daily operations. This lack of training and equipment undermines efforts to create a safe and compliant working environment. Safety risk assessment may be warranted (e.g., conduct one for the sector or community to reduce the costs). Source: Interviews.
Company Action Plan	
Activity	1.Conduct literacy and awareness training on Philippine Occupational, Safety, and Health (OSH) laws and environmental standards. 2. Develop simplified HSE guide, including checklist for safety practices (safe climbing, PPE use, chemical handling) 3. Conduct safety risk assessment. A risk assessment checklist can be added to the farm internal inspection/assessment conducted for the organic and SCC Origin Std.
Output indicators (targeted results)	1. All farmers are trained on Philippine OSH laws and environmental standards, and safe practices. 2. Simplified HSE guide and checklist developed, covering safe climbing, PPE use, and chemical handling. 3. Safety risk assessment conducted on farms, with checklist integrated into internal inspections for organic and SCC Origin standards.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops.

	- May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,
Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. Includes topics on women and children's rights regarding doing work, chemical handling, emergency preparedness. b. At farm level, farmers are expecting farmworkers to already know safe work practices and are practicing it during harvest activities. During interview, it was noted that there is no PPE issued by the farmers to the farmworkers. This is prevalent on all farms visited c. Farmworkers also noted that certain PPE items (such as safety boots/footwear, helmet and harness) may impede their movement during tasks such as tree climbing. In cases of work-related accidents or injuries, the practice is to seek assistance at the nearest barangay health center. d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Chemical Management	
Benchmarks	**Compliance Status**
HSE.9.1: Chemicals and hazardous substances in use must be allowed by local law or by international standards. *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.* *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.* *HSE.11.2: If not provided by law, employers must provide protection to workers who allege violations of accommodations to prevent unsafe exposure to hazardous chemicals and hazardous substances for pregnant women and workers under age 18.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	**HSE.9.1:** Farmers do not clearly know about the banned pesticides, fertilizers, and other agrochemical. All farmers reported that no pesticides, fertilizers, or

	other agrochemicals are needed to be applied on their farms, as they practice organic coconut farming. **HSE.10.:** The farmers do not provide chemical safety training for workers who apply chemicals or other hazardous substances. **HSE.11.1, HSE.11.2.:** There are no precautions taken to ensure that pregnant women and young workers are not unsafely exposed to hazardous chemicals and substances. Source: Interviews.
Company Action Plan	
Activity	1. Conduct Chemical Awareness & Compliance Training on banned/restricted chemicals under Philippine law and FLA standards. Include Training modules on safe handling, storage, and disposal of chemicals. 2. Establish clear rules prohibiting pregnant women and workers under 18 from handling chemicals. This is incorporated in the training and guides provided in CAP12.
Output indicators (targeted results)	1. All farmers are trained on banned/restricted chemicals and safe handling, storage, and disposal practices. 2. Rules prohibiting pregnant women and workers under 18 from handling chemicals are established.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,
Status	Progress as of 18 September 2026 a. DUCOM provided an updated course module for both RGI and ECOREAP trainings providing a more detailed, reader-friendly and simple to understand discussion on occupational health and safety. Additional content such as color coding/ pictogram interpretation of agrochemicals, examples of common workplace accidents, and updated listings of approved chemicals (grouped into insecticides, pesticides, herbicides, fungicides). b. During interview , noted most farms are under DUCOM's organic program. As such, no chemicals being stored at the premises. For the farms visited under the conventional type, they also do not store agrochemicals within the farm premises.

	Pest control measures are through use of pheromone trap or through housekeeping and cleaning of farm premises. c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Protection Reproductive Health	
Benchmarks	**Compliance Status**
HSE.12.1: Employers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	There are no any policy, procedures, or efforts in the assessed farms to ensure that female workers are not engaged in activities that could be harmful to their reproductive health. No female workers have been found working with hazardous materials that could put their reproductive health at risk on the assessment days. Source: Interviews.
Company Action Plan	
Activity	1. Conduct training for farmers and workers on reproductive health risks and safe work practices.
Output indicators (targeted results)	All farmers and workers are trained on reproductive health risks and safe work practices
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,

Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. Includes topics on women and children's rights regarding doing work, chemical handling, emergency preparedness. b. Role of women for farm operations are covered in the RGI training , discussing what is and are not allowed for them to do, particularly for pregnant women. No pregnant and nursing women hired as farmworkers for the farms visited and farmers and farmworkers interviewed c. Further, the local barangay monitors pregnancy at their respective communities and offers prenatal education and care at the barangay health centers, as mandated by the Department of Health d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Machinery Safety	
Benchmarks	**Compliance Status**
HSE.14.1: All production machinery, equipment and tools shall be properly guarded and regularly maintained. *HSE.14.2: Where appropriate, workers shall receive training in the proper use and safe operation of machinery, tractors, equipment and tools they use.* *HSE.14.3: Employers shall ensure safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers. Where workers are illiterate, the instructions should be depicted by pictograms.* *HSE.14.4: Workers shall not suffer any negative consequences for refusing to work with machinery, equipment or tools that are not properly guarded or reasonably considered unsafe.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Hoes, shovels, machetes, watering cans, pruning knives, sprayers, hand hoes, harvesting knives (on long poles), poles, ropes, and baskets or sacks are used by farmers and workers. However, there is no specific training or guidance on the use of sharp and hazardous tools. There are no safety warning signs on the farms. Source: Interviews.
Company Action Plan	
Activity	1. Tool Safety Training on safe use of sharp tools (machetes, knives, sprayers, poles).
Output indicators (targeted results)	All farmers and workers are trained on the safe use of sharp tools (machetes, knives, sprayers, poles),
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance).

	- Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,
Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. b. ECOREAP training specifically covers topics on tool identification and management b. Same observation noted with the interviewed farmworkers from previous visits. All tools needed to perform work are brought by the farmworkers during conduct of harvesting. Some farmers have their own in case needed but this is not a common practice to all farms visited. Cleaning, maintenance and storage of these tools are the responsibilities of the owners. c. No new farmworkers were interviewed on the sampled farms as most have been doing the work for quite some time. Farmworkers shared that in cases where there are new farmworkers, it is more of a verbal guidance from the other farmworkers on how to use the tools d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Ergonomics and Medical Facilities	
Benchmarks	**Compliance Status**
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.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	Medical emergency preparedness was also found to be inadequate. There are no clear procedures for responding to injuries or medical incidents, and farms lack designated personnel or protocols to coordinate with nearby health facilities in the event of an emergency. This gap in preparedness significantly endangers the health and safety of workers. Source: Interviews.
Company Action Plan	

Activity	1. Develop an Emergency Response Protocol that includes instructions for immediate first aid, contacting medical services, and transporting injured workers. Distribute a directory or contact list of the barangay health office, nearby hospitals, clinics, Philippine Red Cross, cooperative/association emergency focal points. 2. Conduct training on Farm Emergency Preparedness to Identified and/or designated Emergency Focal Points at the cooperative and association (barangay) level. 3. Ensure supply of first aid kits to farms
Output indicators (targeted results)	1. Emergency Response Protocol developed and distributed, including first aid procedures, emergency contacts, and transport arrangements. 2. Emergency focal points trained on farm emergency preparedness at the cooperative/association (barangay) level. 3. First aid kits supplied and available on farms.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the HSE module and guidelines, develop incident report forms and setup logbooks, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training Module Posters and flyers, HSE guide and checklists Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trainer Safety Officer/EHO/OSH,
Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. b. At farm level, provisions for first aid is mainly made of medicines used by the household, typically over the counter medications (e.g. paracetamol, band-aid, etc). For illness or accidents which cannot be managed by these, persons go to the barangay health center, or nearest hospital. c. Interviewed Barangay Health Workers to establish health, safety and wellbeing program being offered by the local communities to its residents. Noted presence of first aid kits and over the counter medications at the health centers, with logbook for monitoring of reported cases. One barangay interviewed also has their own ambulance vehicle. Nurses and First aiders are also appointed at each barangay and have designated zones to monitor for incidents of accidents and injuries d. There is also a barangay disaster risk reduction management office (BDRRMO), as mandated by the government, who oversees programs on disaster preparedness and response at barangay level. They are also the one who established emergency evacuation protocols at the barangay level based on the hazard mapping. Education

	of all barangay residents is also being done by the office such as posters, information dissemination e. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes f. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All Farms
	HOW.1.2	In compliance	All Farms
	HOW.1.3	Risk of noncompliance	All Farms
	HOW.1.4	In compliance	All Farms
Rest Day	HOW.2	Noncompliance	All Farms
Meal and Rest Breaks	HOW.3	Risk of Noncompliance	All Farms
Protected Workers	HOW.4.1	Risk of noncompliance	All Farms
	HOW.4.3	Risk of noncompliance	All Farms
Overtime	HOW.5.1	Risk of noncompliance	All Farms
	HOW.6.1	Noncompliance	All Farms
	HOW.6.2	In compliance	
	HOW.7	Not Applicable	
Public Holidays and Leave	HOW.8.1	In compliance	All Farms
	HOW.8.2	In compliance	All Farms
	HOW.9	In compliance	
	HOW.10.1	In compliance	All Farms
	HOW.13	In compliance	
	HOW.14	In compliance	

Hours of Work Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
HOW.1.1: Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.	**Noncompliance in all farms**
How.1.3: Other than in exceptional circumstances or during short-term seasonal work as described under HOW.2, the total weekly work hours (regular work hours plus overtime) shall not exceed 60 hours per week or the legal limit, whichever is lower. The upper limit during a working day shall not exceed 12 hours.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	HOW.1.1.: The farmers are not aware of the relevant national laws, regulations, and procedures concerning hours of work, public holidays, and leave.

	HOW.1.3.: There were no records or observations of overtime during the assessment. However, risks of overtime may occur during peak coconut harvest seasons. Remark: This finding description only covers farms that reported using seasonal workers and family workers. Source: Interviews
Company Action Plan	
Activity	1. Conduct awareness training on Article 91 of the Labor Code and FLA standards, emphasizing workers' entitlement to rest days and conditions for voluntary agreements. 2. Conduct farmer awareness training on Philippine Labor Code provisions for meal and rest breaks, and the minimum requirements (e.g., one-hour meal break, short rest breaks during the day).
Output indicators (targeted results)	1. 100% of participating farmers trained on Philippine labor laws. 2. Standardized work-hour guidelines fully developed and adopted by farmer groups. 3. Recordkeeping system (logbook/timesheet) introduced and implemented in every municipality where the participating farmers live 4. All participating farmers were trained on Labor Code provisions for meal and rest breaks, including the required one-hour meal break and short rest periods.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Recordkeeping forms Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer AssociationTrained Trainer
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation (by profit-sharing), legal age for hiring workers, scope of work). Modules provided to all attendees. b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement. Farmworkers are allowed to work in groups (around 3-4 members) to be able to finish faster. No overtime (beyond 8 hours) work reported.

	c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Rest Day	
Benchmarks	**Compliance Status**
HOW.2: Pursuant to any permanent or temporary contract, workers shall be entitled to at least 24 consecutive hours of rest in every seven-day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following. For short-term seasonal work during peak activities (2-3 weeks), workers have the option to work more than seven days without a day off if they voluntarily agree with it, unless local law prohibits it. When the peak activity period exceeds 3 weeks, and the employer has control over the workers' schedule, the rest day provision must apply.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	The typical working arrangement in coconut farms in the Philippines varies slightly depending on whether the worker is hired on a seasonal basis. Farmers hired no permanent workers. Seasonal workers are commonly engaged for short periods ranging from 2 to 4 weeks, especially during peak harvest or copra production months (usually between December and May). **Reference law:** Agricultural workers in the Philippines fall under the coverage of the Labor Code of the Philippines. Article 91 mandates at least 24 consecutive hours of rest after every six consecutive workdays unless otherwise agreed upon voluntarily and with fair compensation. Typically, the seasonal contracts last no more than 2–4 weeks, and workers agree to work continuous days without rest. All interviewed workers said that they voluntarily accepted the arrangement due to its short duration. No signs of coercion or undue pressure were observed. Workers confirmed that they were informed of the option to rest but chose to work continuously to maximize their income. Remark: This finding description only covers the farms that reported that they use seasonal workers and family workers. Source: Interviews
Company Action Plan	
Activity	1. Conduct awareness training on Article 91 of the Labor Code and FLA standards, emphasizing workers' entitlement to rest days and conditions for voluntary agreements.
Output indicators (targeted results)	1. 100% of participating farmers were trained on Article 91 of the Labor Code and FLA standards, focusing on rest day entitlements and voluntary agreements.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices.

	- By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Recordkeeping forms Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation (by profit-sharing), legal age for hiring workers, scope of work). Modules provided to all attendees. b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement. Farmworkers are allowed to work in groups (around 3-4 members) to be able to finish faster. No overtime (beyond 8 hours) work reported as farmworkers are allowed to manage their time in doing the work per day. c. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes d. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Meal and Rest Breaks	
Benchmarks	**Compliance Status**
HOW.3: Employers shall provide reasonable meal and rest breaks which, at a minimum, must comply with national laws. In the absence of a local law, the meal and rest breaks will be provided as agreed upon between employers and workers.	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Typical working hours on the farm are from 6 to 8 hours, with a starting time usually between 5 and 6 am to avoid harsh sunlight. Lunch break or break time is flexible, depending on needs, weather, and workload. Usually, the seasonal contracts last no more than 2–4 weeks, and workers agree to work continuous days without rest. All workers stated that they had voluntarily accepted the arrangement due to its short duration. No signs of coercion or undue pressure were observed. Workers confirmed that they were informed of the option to rest but chose to work continuously to maximize their income. Remark: This finding description only covers the farms that reported that they use seasonal workers and family workers. Source: Interviews
Company Action Plan	
Activity	1. Conduct farmer awareness training on Philippine Labor Code provisions for meal and rest breaks, and the minimum requirements (e.g., one-hour meal break, short rest breaks during the day).

Output indicators (targeted results)	1. All participating farmers were trained on Labor Code provisions for meal and rest breaks, including the required one-hour meal break and short rest periods.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Recordkeeping forms Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation (by profit-sharing), legal age for hiring workers, scope of work). Modules provided to all attendees. b. Based on the verbal agreement between farmer and farmworker, the number of farmworkers' team sent is already clear. This arrangement is mainly used to minimize total harvest time for the farm lot (during interview it usually range from 3-4 hrs each farm depending on number of farmworkers), no overtime work is being done since a group of farmworkers usually conducts the activities. The payment for all workers is split among them based on the total share of the farmworker and their arrangement with the farmers (e.g. 50/50, 2/3-1/3) c. Meals are provided per agreement of farmer and farmworker and this is not deducted in the total profit share due the farmworker/s. Access to potable water, toilet facilities, etc are provided by the farmers to the farmworkers. d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Protected Workers (pregnant or nursing women, young workers)	
Benchmarks	**Compliance Status**
HOW.4.1: The workplace shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers. *HOW.4.3: If not provided by law, employers must provide protection to workers who allege violations of laws governing work hours limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers.*	**Risk of Noncompliance in all farms**

Findings/Noncompliance Explanation	There are laws to protect pregnant and nursing women; however, they may not apply in the coconut farming because of the short-term work and because of no presence of female seasonal workers.[1] All farms have a risk of noncompliance regarding young workers as some farmers claimed to use them from time to time. As stated in Republic Act No. 9231, minors aged 15 to 17 may be employed only under the following conditions: * Maximum of 8 working hours per day and 40 hours per week. * Not allowed to work between 10:00 PM and 6:00 AM. * Prohibited from engaging in hazardous, strenuous, or morally harmful work environments. During the assessment, no pregnant women, breastfeeding mothers, or young workers were observed or reported working in the coconut farms. However, in the absence of a formal monitoring mechanism, there remains a potential risk of non-compliance with labor regulations concerning vulnerable workers. Source: Interviews
Company Action Plan	
Activity	1. Conduct farmer awareness training on the provisions of RA 9231 on rules for minors (15–17 years) - Max 8 hours/day, 40 hours/week; No work between 10:00 PM–6:00 AM.; No hazardous, strenuous, or morally harmful work, and applicable laws on protections for pregnant/nursing women - Republic Act No. 10028 (Expanded Breastfeeding Promotion Act).
Output indicators (targeted results)	1. 100% of participating farmers were trained on the provisions of RA 9231 for minors and RA 10028 for women, ensuring awareness of legal limits on work hours, prohibited tasks, and protections for pregnant and nursing workers.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Recordkeeping forms Venue, logistics & meals

[1] Under Republic Act No. 11210 (105-Day Expanded Maternity Leave Law), pregnant women, including those in agriculture and informal work, are entitled to 105 days of paid maternity leave, with an option to extend for an additional 30 days without pay.
While there is no specific provision on daily reduced working hours for pregnant women, the Philippine Labor Code prohibits women from working at night in agriculture unless they are given at least nine consecutive hours of rest.
According to Republic Act No. 10028 (Expanded Breastfeeding Promotion Act), breastfeeding mothers are entitled to at least 40 minutes of paid lactation break for every eight hours worked.
While the law does not explicitly prohibit night work or overtime for breastfeeding women, employers are encouraged to provide flexible arrangements and supportive environments.

	Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. Training on Health and Safety, aligned to local national labor laws, are included in the RGI and ECOREAP trainings provided by DUCOM, using the relevant local labor law as reference. Covers list of workers' rights regarding occupational health and safety. Includes topics on women and children's rights regarding doing work, chemical handling, emergency preparedness. b. In the RGI training, role of women for farm operations are covered with topics on what is and are not allowed for them to do, particularly for pregnant women. No pregnant and nursing women hired as farmworkers for the farms visited and farmers and farmworkers interviewed c. Further, the local barangay monitors pregnancy at their respective communities and offers prenatal education and care at the barangay health centers, as mandated by the Department of Health d. During the interviews, No children of minor age being employed as farmworkers for all the farmers and farmworkers interviewed. The farmers and farmworkers were able to demonstrate understanding the reason why child labor is discouraged, even for family members. Also, since school has already started , no children or minors present at the farms visited doing work. e. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes f. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Overtime	
Benchmarks	**Compliance Status**
HOW.5.1: Where national laws, regulations and procedures allow it, employers may calculate regular hours of work as an average over a period of longer than one week, provided all formal and procedural requirements attached to such calculation are met (for instance, obtaining official permission from the relevant authorities or observing limits to the period during which such calculations can be made). However, for the purpose of overtime calculation, regular hours of work may not exceed 48 hours per week, irrespective of whether national law provides or not a limitation.	**Risk of Noncompliance in all farms**
HOW.6.1: Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	HOW.5.1.: No workers reported of working more than 12 hours a day or more than 60 hours a week. However, the risk of non-compliance still exists, especially during peak harvest season. HOW.6.1: Under the Philippine Labor Code, specifically Article 87, overtime work is defined as work performed beyond the normal eight-hour workday. Employees who render overtime are entitled to additional compensation. The standard overtime pay is an additional 25% of the employee's regular hourly wage. If the overtime work is performed on a rest day or holiday, the rate increases to an additional 30%. Farmers and workers are often unaware of this law article regarding working hours. Source: Interviews

Company Action Plan	
Activity	1. Conduct awareness training on Philippine Labor Code provisions for overtime (48-hour weekly limit for regular hours and 12-hour daily maximum). 2. Conduct farmer literacy/awareness training on Article 87 of the Labor Code covering overtime definitions, limits, and pay entitlements.
Output indicators (targeted results)	100% of participating farmers were trained on Philippine Labor Code provisions for overtime, ensuring awareness of the 48-hour weekly limit for regular hours and the 12-hour daily maximum. 100% of participating farmers were trained on Article 87 of the Labor Code, ensuring awareness of overtime definitions, limits, and pay entitlements.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship and Child Labor module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Recordkeeping forms Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation (by profit-sharing), legal age for hiring workers, scope of work). Modules provided to all attendees. b. Based on the verbal agreement between farmer and farmworker, the number of farmworkers' team sent is already clear. This arrangement is mainly used to minimize total harvest time for the farm lot (during interview it usually range from 3-4 hrs each farm depending on number of farmworkers), no overtime work is being done since a group of farmworkers usually conducts the activities. The payment for all workers is split among them based on the total share of the farmworker and their arrangement with the farmers (e.g. 50/50, 2/3-1/3) e. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes f. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Noncompliance	All Farms
	C.1.2	In compliance	
	C.1.3	Not Applicable	
	C.1.4	Not Applicable	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	All Farms
	C.2.2	Noncompliance	All Farms
	C.2.3	Noncompliance	All Farms
	C.3	Noncompliance	All Farms
Wage Payment and Calculation	C.6	Risk of Noncompliance	All Farms
	C.7.1	Risk of Noncompliance	All Farms
	C.7.2	Not Applicable	
	C.7.5	Risk of Noncompliance	All Farms
	C.8.1	Noncompliance	All Farms
	C.8.2	Noncompliance	All Farms
	C.8.3	Noncompliance	All Farms
	C.10.1	Not Applicable	
	C.10.1.1	Not Applicable	
	C.10.2	Not Applicable	
	C.10.3	Not Applicable	
Workers Awareness	C.11.1.1	Risk of Noncompliance	All Farms
	C.11.1.2	Risk of Noncompliance	All Farms
	C.11.1.3	Risk of Noncompliance	All Farms
	C.11.1.4	Risk of Noncompliance	All Farms
	C.11.1.5	Risk of Noncompliance	All Farms
Fringe Benefits	C.12.1	Not Applicable	
	C.12.3	Not Applicable	
	C.12.4	Not Applicable	
	C.12.5	Not Applicable	

Compensation Assessment Summary

General Compliance	
Benchmarks	**Compliance Status**
C.1.1: Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations and procedures concerning the payment of compensation to workers.	**Noncompliance in all farms**
Findings/Noncompliance Explanation	The farmers do not know of any regulations and procedures concerning the payment of compensation to workers. Source: Interview
Company Action Plan	
Activity	1. Conduct farmer awareness training on Philippine Labor Code provisions for compensation (minimum wage, overtime pay, holiday pay, rest day pay), and awareness of CBAs where applicable.
Output indicators (targeted results)	100% participating farmers were trained on Labor Code provisions for compensation—including minimum wage, overtime, holiday, and rest day pay—with added awareness of collective bargaining agreements where applicable.
Timeline and Deadline Date	Next Steps (2026):

	- Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Wage Information Sheet template Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer Legal Compliance Advisor / Labor Standards Specialist (external resource person like DOLE Labor Law Compliance Officer (LLCO) or Municipal/City Legal Officer)
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation arrangement, legal age for hiring workers, scope of work). Modules provided to all attendees. b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement c. DUCOM has developed a new document , the Copra Purchase Receipt (CPR), which works the same as the pisada system, but is now controlled and traceable within the farmer/farmworker supply chain. This is due for rollout this year d. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes e. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Minimum Wage/Fair Compensation	
Benchmarks	**Compliance Status**
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 legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them. *C.2.2: Employers shall provide all legally required benefits to all workers.* *C.2.3: Employers shall not set production targets at such a level that workers need to work beyond regular working hours as set under the FLA Workplace Code, excluding overtime, in order to achieve at least the minimum wage.* *C.3: Employers shall ensure that the wages for daily, casual, long term, task specific or contract workers are paid in accordance with the national laws applied to regular workers. For work based on production quotas and piecework performed during normal working hours, workers must get paid the proportionate minimum wage or the relevant industry average wage, whichever is higher.*	**Noncompliance in all farms**

Findings/Noncompliance Explanation	Wages were based on output rather than fixed daily rates, with workers typically receiving a portion equivalent to one-third to one-half of the farmer's total income, depending on regional practices and customs. Reported worker earnings ranged from PHP 1,500 (approximately USD 27) to PHP 3,000 (approximately USD 54) per harvest season—approximately PHP 250 (approximately USD 4.50) to PHP 500 (approximately USD 9.00) per day. When compared to the statutory daily minimum wage of PHP 453 (USD 8.16) for an 8-hour workday in the region, these wages fall short of the legal standard, highlighting a significant compliance gap in labor remuneration during peak agricultural periods. Source: Interview
Company Action Plan	
Activity	1. Conduct farmer orientation and training on wage compliance based on minimum wage laws and benefits. Training materials will incorporate a practical calculation tool that enables farmers to compute and cross-check wages under different schemes—unit-based, output-based, and revenue-sharing—to ensure compliance with legal minimum wage requirements. 2. Introduce simple payroll logbooks to record daily wages, benefits, and deductions, and conduct initial pilot in one municipality through a cooperative and a federation of small coconut farmer associations (barangay/community-based).
Output indicators (targeted results)	100% participating farmers trained on wage compliance and use of practical calculation tools. Payroll logbooks introduced and piloted in one municipality through cooperatives/associations.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Wage Information Sheet template Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer Legal Compliance Advisor / Labor Standards Specialist (external resource person like DOLE Labor Law Compliance Officer (LLCO) or Municipal/City Legal Officer)
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation arrangement, legal age for hiring workers, scope of work). Modules provided to all attendees.

	b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement c. Per interviews conducted, there is no formal documentation of the pricing and payment process. Information on the total weight of harvested copra and the corresponding total price and profit share is exchanged verbally (either 50/50 or 2/3-1/3). The current practice of documenting involves the use of a piece of paper (pisada) provided by the traders, detailing this information and serving as proof of payment acknowledged by all parties. It was noted during interviews that not all the farmer nor the farmworker retains copies of all these slips as records are with the traders/cooperatives. d. DUCOM has developed a new document , the Copra Purchase Receipt (CPR), which works the same as the pisada system, but is now controlled and traceable within the farmer/farmworker supply chain. This is due for rollout this year e. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes f. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Wage Payment and Calculation	
Benchmarks	**Compliance Status**
C.8.1: Employers shall compensate workers for all hours worked. *C.8.2: Employers shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. There might however be specific working schemes voluntarily agreed by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision not applicable.* *C.8.3: Workers shall be informed in writing or orally where necessary, in language(s) spoken by workers, about overtime wage rates prior to undertaking overtime.*	**Noncompliance in all farms**
C.6: All wages, including payment for overtime, shall be paid within legally defined time limits. Where no time limits are defined by law, compensation shall be paid at least once a month or upon completion of a seasonal task which takes less than a month. *When workers are hired through contractors, brokers or external agencies, employers shall make sure that workers are paid according to the benchmark requirements.* *C.7.1: All payments to workers, including hourly wages, piecework, fringe benefits and other incentives shall be calculated, recorded, and paid in a manner that is convenient to workers (e.g., in cash, by bank transfer or check).* *C.7.5: No one can receive wages on behalf of a worker, unless the worker concerned has, in full freedom, authorized in writing for another person to do so.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	**C.6.1, C.7.1, C.7.2, C.7.3:** The payments were settled immediately after daily work was completed or at the end of the season, and workers were paid individually. Wage payments to workers are typically made in cash without any formal documentation. These transactions are not traceable through bank transfers and are not supported by reliable receipts or witnesses. The absence of verifiable records limits both farmer's and workers' protection in the event of disputes regarding compensation. **C.8.1, C. 8.2, C.8.3:** Working hours are not clearly specified as regular working hours and overtime hours; the actual working hours depend on the harvesting seasons, and the overtime compensation rates could not be verified. Remark: This finding description only covers the farms that reported that they use seasonal workers and family workers. Source: Interview

Company Action Plan	
Activity	1. Conduct farmer training on Philippine Labor Code provisions for wage payment, overtime, and premium rates - Article 87 (overtime pay), Article 91 (rest day pay), and holiday pay entitlements, documentation (receipts and records), and direct payment to workers. 2. Introduce payroll logbooks and receipt templates to farmers, and conduct initial pilot in one municipality through a cooperative and a federation of small coconut farmer associations (barangay/community-based) 3. Conduct awareness training sessions to farmworkers as part of the pilot.
Output indicators (targeted results)	1. 100% of the participating farmers trained on wage payment, documentation, direct payment practices, overtime, rest day, and holiday pay entitlements under Articles 87 & 91. 2. Payroll logbooks and receipt templates introduced and piloted in one municipality. 3. 100% of the farmworkers oriented through awareness sessions.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops. - May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Wage Information Sheet template Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer Legal Compliance Advisor / Labor Standards Specialist (external resource person like DOLE Labor Law Compliance Officer (LLCO) or Municipal/City Legal Officer)
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation arrangement, legal age for hiring workers, scope of work). Modules provided to all attendees. b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement c. Per interviews conducted, there is no formal documentation of the pricing and payment process. Information on the total weight of harvested copra and the corresponding total price and profit share is exchanged verbally (either 50/50 or 2/3-1/3). The current practice of documenting involves the use of a piece of paper (pisada) provided by the traders, detailing this information and serving as proof of payment acknowledged by all parties. The amount received by farmworkers varies per harvest day depending on the amount harvested and sold. It was noted during

	interviews that not all the farmer nor the farmworker retains copies of all these slips as records are with the traders/cooperatives. e. DUCOM has developed a new document , the Copra Purchase Receipt (CPR), which works the same as the pisada system, but is now controlled and traceable within the farmer/farmworker supply chain. This is due for rollout this year e. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes f. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training

Workers Awareness	
Benchmarks	**Compliance Status**
C.11.1: Employers shall make every reasonable effort to ensure workers understand their compensation, including: *C.11.1.1: the calculation of wages,* *C.11.1.2: incentives systems,* *C.11.1.3: fringe benefits, and* *C.11.1.4: bonuses they are entitled to at the workplace and under applicable laws.* *C.11.1.5: Employers shall communicate in writing or orally where necessary to all workers all relevant compensation information in the local language or language spoken by the workers, if different from the local language.*	**Risk of Noncompliance in all farms**
Findings/Noncompliance Explanation	Wages were based on output rather than fixed daily rates, with workers typically receiving a portion equivalent to one-third to one-half of the farmer's total income, depending on regional practices and customs. According to the workers, they were not informed of how much the total income of the farmers from the sale of the copra because the sales prices of coconuts is not known at the beginning of the employment. The absence of such information leaves workers without a clear understanding of their entitlements or whether they are being paid in accordance to the initial verbal agreement made between them and the farmers. Source: Interview
Company Action Plan	
Activity	1. Conduct training sessions for farmers and farmworkers on wage calculation methods, incentive systems, and benefits. 2. Introduce a Wage Information Sheet template to show calculation of wages according to the applicable scheme—unit-based, output-based, and revenue-sharing, and convert to daily wage rate. The said wage information sheet shall include incentives, benefits and bonus structures as applicable. This shall also be piloted.
Output indicators (targeted results)	1. 100% of the Farmers and farmworkers are trained on wage calculation, incentives, and benefits. 2. Wage Information Sheet template introduced and piloted, showing compliance across different schemes.
Timeline and Deadline Date	Next Steps (2026): - Jan–Apr: Finalize the Employment Relationship module, refine IEC materials, onboard farmer-trainers, implement ToT sessions, and continue outreach workshops.

	- May–Nov: Roll out cascading community trainings by farmer-trainers, with ongoing mentoring, monitoring, and targeted capacity-building (e.g., grievance handling, environmental compliance). - Dec: Validate farmer reach, consolidate module reports, and conduct overall programme evaluation with documentation of best practices. - By Year-End: Train 100% of coconut farmers across all modules, ensuring improved awareness of labor rights, environmental protections, and fair recruitment.
Input (budget/resources)	Training materials, Wage Information Sheet template Venue, logistics & meals Honorarium for Cooperative/Association Trainer
Responsible staff (title/department)	DUCOM Sustainability Specialist - Community Engagement and Social Programs team Cooperative/Farmer Association Trained Trainer Legal Compliance Advisor / Labor Standards Specialist (external resource person like DOLE Labor Law Compliance Officer (LLCO) or Municipal/City Legal Officer)
Status	Progress as of 18 September 2026 a. ECORGI training module already covers discussion on employment practices and topics to be covered (hours of work, compensation arrangement, legal age for hiring workers, scope of work). Modules provided to all attendees. b. During interviews, verbal agreement between farmer and farmworkers on the working arrangements is still the prevailing practice. Both interviewed farmers and farmworkers for all barangays visited demonstrate consistent response on this topic on employment arrangement c. Per interviews conducted, there is no formal documentation of the pricing and payment process. Information on the total weight of harvested copra and the corresponding total price and profit share is exchanged verbally (either 50/50 or 2/3-1/3). The current practice of documenting involves the use of a piece of paper (pisada) provided by the traders, detailing this information and serving as proof of payment acknowledged by all parties. The amount received by farmworkers varies per harvest day depending on the amount harvested and sold. It was noted during interviews that not all the farmer nor the farmworker retains copies of all these slips as records are with the traders/cooperatives. e. DUCOM has developed a new document , the Copra Purchase Receipt (CPR), which works the same as the pisada system, but is now controlled and traceable within the farmer/farmworker supply chain. This is due for rollout this year e. Aligning with the program and workshop set forth by DIWA, DUCOM team decided to review training schedules for ECOREAP and RGI trainings to align with the workshop outcomes f. DUCOM updated strategy in delivering both ECOREAP and ECO-RGI training with consideration on the timing and ensure maximum coverage of each community. Revised training delivery program to be implemented starting October scheduled training