

## Particulars

### About Your Organisation

#### 1.1 Name of your organization

Creightons PLC

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#### 1.2 What is/are the primary activity(ies) or product(s) of your organization?

- Grower
  - Processor and/or Trader
  - Consumer Goods Manufacturer
  - Retailer and/or Wholesaler
  - Bank and/or Investor
  - Social and/or Development NGO
  - Environmental and/or Conservation NGO
  - Supply Chain Associate
  - Affiliate
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#### 1.3 Membership number

4-0406-14-000-00

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#### 1.4 Membership category

Consumer Goods Manufacturers

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#### 1.5 Membership sector

Ordinary

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**Consumer Goods Manufacturer****1. Operational Profile**

1.1 Please state your main activity(ies) within the palm oil supply chain. Please select the option(s) that apply to you

- End-product manufacturer  
 Food goods manufacturer  
 Ingredient manufacturer  
 Home & personal care goods manufacturer  
 Own-brand manufacturer  
 Manufacturing on behalf of other third-party brands  
 Biofuels manufacturer  
 Other

Other:

**2. Palm Oil and Certified Sustainable Palm Oil Use**

2.1 Please include details of all operations using palm oil, owned and/or managed by the member and/or all entities that belong to the group.

No actual palm oil or palm kernel oil is used

Derivatives of palm oil such as detergents, emulsifier, emollients and soap are used for the manufacture of wide range of toiletry products including creams, lotion, foam baths, shower gel, shampoo, hair conditioner, baby products, scrubs, soaps etc

2.1.1 In which markets do you manufacture goods with palm oil and oil palm products?

Australia , Chile , France , Germany , Ireland , Netherlands , Russia , Saudi Arabia , South Africa , Sweden , United Arab Emirates , United Kingdom

2.1.2 In the market(s)/country(ies) where you operate, do you calculate how much palm oil and oil palm product there is in the goods you manufacture?

No

2.2 Volumes of palm oil and oil palm products purchased

2.2.1 Total volume of crude and refined palm oil used in the year (tonnes)

0.00

2.2.2 Total volume of crude and refined palm kernel oil used in the year (tonnes)

0.00

2.2.3 Total volume of palm kernel expeller used in the year (tonnes)

0.00

2.2.4 Total volume of other palm-based derivatives and fractions used in the year (tonnes)

1,278.00

**2.2.5 Total volume of all palm oil and oil palm products used in the year (tonnes)**

1,278.00

**2.3 Volume of palm oil and oil palm products used in the year in your own brand products that are RSPO-certified (in tonnes):**

Description	Crude and Refined Palm Oil	Crude and Refined Palm Kernel Oil	Palm Kernel Expeller	Other palm-based derivatives and fractions
2.3.1 Book and Claim from Mill / Crusher	-	-	-	50
2.3.2 Book and Claim from Independent Smallholder	-	-	-	-
2.3.3 Mass Balance	-	-	-	1176
2.3.4 Segregated	-	-	-	57
2.3.5 Identity Preserved	-	-	-	-
2.3.6 Total volume	-	-	-	1283

**2.4 Volume of RSPO-certified palm oil and oil palm products sold to 3rd party RSPO certified companies (in tonnes)**

Description	Crude and Refined Palm Oil	Crude and Refined Palm Kernel Oil	Palm Kernel Expeller	Other palm-based derivatives and fractions
2.4.1 Book and Claim from Mill / Crusher	-	-	-	-
2.4.2 Book and Claim from Independent Smallholder	-	-	-	-
2.4.3 Mass Balance	-	-	-	-
2.4.4 Segregated	-	-	-	-
2.4.5 Identity Preserved	-	-	-	-
2.4.6 Total volume	-	-	-	-

**2.5 According to the information you have provided in this questionnaire, your company has not reached 100% sustainable palm yet by using the four supply chain models (Book and Claim, MB, SG, IP). Do you have plans to immediately cover the gap by using RSPO Credits?**

**2.5.1 When do you plan to cover the gap by using RSPO Credits?**

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**2.5.2 Please explain why**

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**2.6 What is the percentage of RSPO Certified Sustainable Palm Oil in the total palm oil used by your company in the following regions:**

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**2.6.1 Africa**

2%

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**2.6.2 Oceania**

2%

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**2.6.3 Europe**

92%

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**2.6.4 North America**

0%

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**2.6.5 Latin America**

2%

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**2.6.6 Middle East**

2%

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**2.6.7 China**

0%

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**2.6.8 India**

0%

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**2.6.9 Indonesia**

0%

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**2.6.10 Malaysia**

0%

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**2.6.11 Rest of Asia**

0%

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**3. Time-Bound Plan**

**3.1 Year of first supply chain certification (planned or achieved)**

2014

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**3.2 Year expected to/or started to use any RSPO-certified sustainable palm oil and oil palm products in your own brand products**

2015

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**3.2.1 If target has not been met, please explain why.**

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**3.3 Year expected to be using 100% RSPO-certified sustainable palm oil and oil palm products from any supply chain option in your own brand products.**

2022

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**3.3.1 If target has not been met, please explain why.**

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**3.4 Year expected to be using 100% RSPO-certified sustainable palm oil and oil palm products from physical supply chains (Identity Preserved, Segregated and/or Mass Balance) in your own brand products.**

2022

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**3.4.1 If target has not been met, please explain why.**

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**3.4.2 Which markets do these commitments cover?**

Applies globally

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**3.5 Does your company use RSPO-certified sustainable palm oil and oil palm products in goods you manufacture on behalf of other companies?**

Yes

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**3.6 Does your company have a Time-Bound Plan to only use RSPO-certified sustainable palm oil and oil palm products in the goods you manufacture on behalf of other companies?**

Yes

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**3.7 When do you expect all products you manufacture to only contain RSPO-certified sustainable palm oil and oil palm products?**

2022

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**4. Trademark Use**

**4.1 Do you use or plan to use the RSPO Trademark on your own brand products?**

Yes

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**4.2 Please select the countries where you use or intend to apply the Trademark.**

Applies globally

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**4.2.1 Please state the year that you started using the RSPO Trademark or the year you plan to start using the RSPO Trademark.**2020

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**4.3 Please explain why**

- Challenging reputation of palm oil
  - Confusion among end-consumers
  - Costs of changing labels
  - Difficulty of applying for RSPO Trademark
  - Lack of customer demand
  - Limited label space
  - Low consumer awareness
  - Low usage of palm oil
  - Risk of supply disruption
  - Others
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Other:

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**4.4 Have you uploaded information and images of products using the RSPO Trademark to the RSPO mobile app?**No

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**5. Actions for Next Reporting Period****5.1 Outline actions that you will take in the coming year to promote the use of RSPO-certified sustainable palm oil and oil palm products along the supply chain.**

Creightons PLC is committed to the principles of the RSPO and purchasing CSPO materials where ever possible. In 2018 almost 96% of the palm derived materials bought were CSPO, the remainder of the palm covered by palm certificates. Company will continue to support customers and brands in making products with sustainable palm and encourage use of RSPO labelling.

For palm materials which are not from a sustainable source we will purchase palmtrace certificates.

We will continue to actively source replacements for these materials

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**6. Non-Disclosure of Information**

**6.1 Information in the sections above are mandatory declarations in your ACOP. For confidentiality purposes, members may choose not to display volume data in Section 2 publicly; however, RSPO reserves the right to utilise the member's data on an aggregate basis for sectoral and total analysis. Please check this box if the member chooses to have the data in Section 2 displayed publicly.**

Yes - Display Publicly

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**7. Application of Principles & Criteria for all member sectors**

**7.1 Related to company's procurement or operations, do you have organisational policies that are in line with the RSPO P&C? Select all relevant options.**

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**7.1.A Water, land, energy and carbon footprints**

File: [E001 Environment procedure.pdf](#)  
Link: relevant policy attached

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**7.1.B Land use rights**

File: [E001 Environment procedure.pdf](#)  
Link: relevant policy attached

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**7.1.C Ethical conduct and human rights**

File: [POL017 Ethical.pdf](#)  
Link: relevant policy attached

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**7.1.D Labour rights**

File: [POL017 Ethical.pdf](#)  
Link: relevant policy attached

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**7.1.E Stakeholder engagement**

File: [POL017 Ethical.pdf](#)  
Link: relevant policy attached

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**7.1.F None of the above. Please explain why.**

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**7.2 What best practice guidelines or information has your organisation provided in the past year to facilitate the uptake of RSPO-certified sustainable palm oil and oil palm products? What languages are these guidelines available in?**

Have met requirements of all major UK customers such as Asda, Tesco, Boots, Primark and Superdrug and assisted them in supplying palm tonnage returns for their products.  
Have maintained Supply Chain audit certification with no non conformances

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**8. Greenhouse Gas (GHG) Footprint****8.1 Are you currently reporting any GHG footprint?**

Yes

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**8.1.1 Please upload your publicly available GHG report**

File: [Cplc 2018 Stat Acc - Final.pdf](#)

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**8.1.1.1 OR please insert the URL to the GHG section of your corporate website.**

Link:

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**8.2 Please explain and justify why you are not calculating your GHG footprint. Please include any future plans you may have to calculate your GHG footprint.**

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**8.3 What methodology are you using to calculate your GHG footprint?**

We have reported on all of the emissions sources required under the Large and Medium-sized Companies and Groups (Accounts and Reports) Regulation 2008 as amended in August 2013. The reporting boundary used for the collation of the above data is consistent with that used for consolidation purposes in the financial statements. We have used GHG Protocol Corporate Accounting and Reporting Standard (revised edition), data gathered to fulfil our requirements under the CRC Energy Efficiency scheme, and emission factors from the UK Governments GHG Conversion Factors for Company Reporting 2014 to calculate the above disclosures.

The key sources for emissions are gas and electricity. We have not included Co2e emissions from Group employees, travel which we consider to be immaterial.

The Group set a target of reducing tonnes of Co2e per £m of cost of sales by 5% (based on the figures reported in the year ended 31 March 2013 of 110.5 tonnes of Co2e per £m of cost of sales) over the 5 years ending 31 March 2018, which was achieved.

The target for the next five years to 31 March 2023 will be to reduce tonnes of Co2e per £m of cost of sales by 20%. This will be achieved by ensuring that activities are monitored with the aim of reducing waste and that capital expenditure plans take into consideration the impact on the Group's consumption of Co2e.

**9. Support for Oil Palm Smallholders****9.1 Are you currently supporting any oil palm Independent Smallholder groups?**

No

**9.2 How are you supporting them?**

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**9.2.1 Do you have any future plans to support oil palm Independent Smallholders?**

No

**9.2.2 When do you plan to start your support for oil palm Independent Smallholders?**

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**10. Challenges****10.1 What significant economic, social or environmental obstacles have you encountered in the production, procurement, use and/or promotion of CSPO and what efforts did you make to mitigate or resolve them?**

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- Others

**Other:**

CSPO materials are still significantly more expensive, many of our customers require us to use these materials in their products but are not prepared to share the additional cost. In most cases all additional costs are absorbed by us. Some materials, eg palm derivatives are not commercially available as CSPO, continuing to work with suppliers to resolve this. Moving forward is really in the hands of our suppliers being able supply commercially available, constantly available material.

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**10.2 In addition to the actions already reported in this ACOP, how has your organisation supported the vision of RSPO to transform the market for sustainable palm oil in other ways?**

- Engagement with business partners or consumers on the use of CSPO
  - Engagement with government agencies
  - Promotion of CSPO outside of RSPO venues eg trade workshops industry associations
  - Promotion of physical CSPO
  - Providing funding or support for CSPO development efforts
  - Research & Development support
  - Stakeholder engagement
  - Others
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**Other:**

Have worked very closely with UK and overseas suppliers to encourage movement to mass balance or segregated sources. This has included commitment to buy six months in advance and buy fixed contract quantities where required. Also worked very closely with major UK retailers to support their palm policies. Have an education program within our business to train all major sales and technical staff in the importance of buying sustainable palm oil material

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**10.3 Please attach or add links to any other information from your organisation on your palm oil policies and activities (e.g.: sustainability reports, policies, other public information)**

<https://www.creightons.com/>

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