

**RSPO**

Roundtable on  
Sustainable Palm Oil

ACOP SECTORAL REPORT

**ACOP**

Annual Communications Of Progress

— **SECTORAL REPORT** —

**2016**



**Bank & Investors**

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**Particulars**

**About Your Organisation**

**Organisation Name**

ABN AMRO Bank N.V.

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**Corporate Website Address**

<http://www.abnamro.com/en/index.html>

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**Primary Activity or Product**

- Finance
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**Related Company(ies)**

No

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**Membership**

Membership Number	Membership Category	Membership Sector
5-0016-14-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

**1.1 Please state what your main activities are within finance\***

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Investment / Equity
- Debt / Capital Markets
- Capital Market Advisory Service

### Operations in Palm Oil

**2.1 What are the various types of financial services to the palm oil sector provided by your organization?**

- Trade Solution
- Lending / Loans
- Treasury Products

**2.2 What geographic regions do you operate in for the palm oil business?**

- Worldwide

### Palm Oil Policy

**3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?**

Yes

**Uploaded files:**

- [F-Lending-Policy.pdf](#)

**3.2 Which sub-sectors does your palm oil policy cover?**

- Traders
- Processors
- Retailers

**3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?**

Yes

**3.3.1 Do you require your customers to be RSPO members?**

No

**3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?**

No

**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

ABN AMRO undertakes a review of the client and engage with the company to address the issues until they are rectified

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan**

**4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2020

**Comment:**

RSPO membership is currently not a lending criteria but it is included as a key reference in ABN AMRO's Agri-Commodities Policy and Palm Oil questionnaire. The bank references RSPO and evaluates clients' progress towards RSPO membership and certification.

**4.3 When do you expect to require 100% certification for other sectors?**

2020

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally
- Netherlands

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

ABN AMRO is in the process to update the Agri-Commodities Policy and the Palm Oil supplement. RSPO membership will be a "minimum requirement" for clients. The draft policy is currently being discussed with several stakeholders to gather their feed-back.

**GHG Emissions**

**5.1 Are you currently assessing the GHG emissions from your operations?**

No

**Please explain why:**

Not relevant for financial institutions

**Do you publicly report the GHG emissions of your operations?**

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**Actions for Next Reporting Period**

**6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

ABN AMRO will finalise and enforce the new Agri-Commodities policy and Palm Oil supplement which is a part of this Policy. The bank will continue its engagement with clients to closely monitor compliance with the new policy and the implementation of their plans to RSPO

**Reasons for Non-Disclosure of Information**

7.1 If you have not disclosed any of the above information please indicate the reasons why

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## Application of Principles & Criteria for all members sectors

8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:

- Land Use Rights
  - Ethical conduct and human rights
- 

8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?

ABN AMRO aims to promote responsible business conduct. Within the banking sector, ABN AMRO has taken a leading position in engaging in a number of cross-sectors initiatives such as Human Rights due diligence, responsible ship dismantling etc.

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8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?

No

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8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?

All clients need to comply with the Bank's social and environmental criteria (please refer to the ABN AMRO Sustainability page on internet [www.abnamro.com](http://www.abnamro.com)). The Bank undertakes due diligence to assess that the clients meet RSPO Principles & Criteria and monitors clients' progress towards CSR commitments. The Bank regularly engages with clients on their efforts and reviews their RSPO - ACOP time bound plans and also with clients stakeholders and experts such as RSPO and NGO's.

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## Concession Map

9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)

Do you agree to share your concession maps with the RSPO?

No

Please explain why

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## Challenges

**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?**

Biggest challenge is the engagement and promotion of the RSPO standads within local branches and banks to the same standards globally, and thereby encouraging companies to adopt RSPO standards in the local context may be limited.

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**2 How would you qualify RSPO standards as compared to other parallel standards?**

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**Cost Effective:**

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**Robust:**

Yes

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**Simpler to Comply to:**

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**3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)**

Through engagement with clients and NGO's and participation in RSPO meetings (including European RSPO)

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**4 Other information on palm oil (sustainability reports, policies, other public information)**

In 2015, ABN AMRO Agri-Commodities Policy, which identifies Palm Oil as a high risk sector, was revised to reflect current international norms and standards and the RSPO Principles and Criteria (2013). The revision process is expected to be finalised in the course of 2016. The updated policy will include an annex that will serve as a supplemental policy for all financial products and services to clients in the entire value chain of palm oil.

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## Particulars

### About Your Organisation

**Organisation Name**

ANZ Banking Group Limited

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**Corporate Website Address**

<http://www.anz.com>

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0008-08-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Debt / Capital Markets
- Capital Market Advisory Service

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans
- Leasing
- Treasury Products
- Cash Management Products

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Worldwide

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors
- Other:  
ANZ's Forestry and Forest Policy attached provides an overview of ANZ's commitment and risk based principles which are used to evaluate decision making in the palm sector. Detailed procedures are confidential

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

##### 3.3.1 Do you require your customers to be RSPO members?

Yes

##### 3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

(3.3.1, 3.3.2, 3.4, 4.1) ANZ's sustainability approach and standards are aligned to the social and environmental principles established by RSPO, and the bank encourages its customers to be RSPO members and establish a time-bound plan for full RSPO certification under its responsible business lending policy. However, the bank is disposed to make exceptions where a customer can positively demonstrate adherence to appropriate social, environmental and sustainability principles outside of the RSPO certification process.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

No

**4.2 When do you expect to require 100% certification for growers?**

2025

**Comment:**

RSPO members are expected to be 100% certified within an acceptable period to RSPO and ANZ depending on the circumstances of the grower.

**4.3 When do you expect to require 100% certification for other sectors?**

2025

**Comment:**

RSPO members in other sectors are expected to operate with 100% certification within an acceptable period to RSPO and ANZ depending on the circumstances of the client.

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

Our senior Institutional bankers attend a facilitated in person training on transaction level decision making. This course directly supports responsible decision making covering social, environmental and governance issues and provides attendees with practical case studies and engages them in role plays through an intensive half day program. By delivering this program we continue to strengthen ANZ's approach to managing social and environmental impacts. It has been delivered in partnership with industry experts and NGOs. Our sensitive sector policies adopt a principles-based risk framework which is applied to decision-making in sensitive transactions across the industries. We support customers that demonstrate a balanced approach to social, environmental and developmental impacts and we expect customers to adopt management practices to continuously improve their social and environmental performance. ANZ supports customers that use internationally accepted industry management practices to manage social, environmental and economic impacts (including effects on human rights, biodiversity, cultural heritage, indigenous rights, health and safety, governance and environmental sustainability).

**GHG Emissions**

**5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

**Uploaded file:**[F-GHG-Public-Report.pdf](#)[www.anz.com/about-us/corporate-responsibility/environment/targets-performance/carbon/](http://www.anz.com/about-us/corporate-responsibility/environment/targets-performance/carbon/)

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**Do you publicly report the GHG emissions of your operations?**

Yes

[www.anz.com/about-us/corporate-responsibility/environment/targets-performance/carbon/](http://www.anz.com/about-us/corporate-responsibility/environment/targets-performance/carbon/)

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**Actions for Next Reporting Period****6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

Our senior Institutional bankers attend a facilitated in person training on transaction level decision making. This course directly supports responsible decision making covering social, environmental and governance issues and provides attendees with practical case studies and engages them in role plays through an intensive half day program. By delivering this program we continue to strengthen ANZ's approach to managing social and environmental impacts. It has been delivered in partnership with industry experts and NGOs. Our sensitive sector policies adopt a principles-based risk framework which is applied to decision-making in sensitive transactions across the industries. We support customers that demonstrate a balanced approach to social, environmental and developmental impacts and we expect customers to adopt management practices to continuously improve their social and environmental performance. ANZ supports customers that use internationally accepted industry management practices to manage social, environmental and economic impacts (including effects on human rights, biodiversity, cultural heritage, indigenous rights, health and safety, governance and environmental sustainability).

**Reasons for Non-Disclosure of Information****7.1 If you have not disclosed any of the above information please indicate the reasons why**

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**Application of Principles & Criteria for all members sectors****8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:**

- Water, land, energy and carbon footprints  
[F-Policies-to-PNC-waterland.pdf](#)
  - Land Use Rights  
[F-Policies-to-PNC-landuseright.pdf](#)
  - Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
  - Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
  - Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)
-

**8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?**

Strict assessment and compliance with ANZ's Sensitive Sector policies, reviewed across all clients annually. Our senior Institutional bankers attend a facilitated in person training on transaction level decision making. This course directly supports responsible decision making covering social, environmental and governance issues and provides attendees with practical case studies and engages them in role plays through an intensive half day program. By delivering this program we continue to strengthen ANZ's approach to managing social and environmental impacts. It has been delivered in partnership with industry experts and NGOs. Our sensitive sector policies adopt a principles-based risk framework which is applied to decision-making in sensitive transactions across the industries. We support customers that demonstrate a balanced approach to social, environmental and developmental impacts and we expect customers to adopt management practices to continuously improve their social and environmental performance. ANZ supports customers that use internationally accepted industry management practices to manage social, environmental and economic impacts (including effects on human rights, biodiversity, cultural heritage, indigenous rights, health and safety, governance and environmental sustainability).

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**8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?**

No

**Please explain why:**

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**8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?**

At least annually all customers undergo an assessment against our Sensitive Sector policies. The assessment includes sourcing information from RSPO, public and independent reports, and annual sustainability publications.

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**Concession Map****9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)**

**Do you agree to share your concession maps with the RSPO?**

No

**Please explain why**

Not applicable to ANZ

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## Challenges

**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?**

Not Applicable to ANZ

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**2 How would you qualify RSPO standards as compared to other parallel standards?**

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**Cost Effective:**

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**Robust:**

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**Simpler to Comply to:**

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**3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)**

Our senior Institutional bankers attend a facilitated in person training on transaction level decision making. This course directly supports responsible decision making covering social, environmental and governance issues and provides attendees with practical case studies and engages them in role plays through an intensive half day program. By delivering this program we continue to strengthen ANZ's approach to managing social and environmental impacts. It has been delivered in partnership with industry experts and NGOs. Our sensitive sector policies adopt a principles-based risk framework which is applied to decision-making in sensitive transactions across the industries. We support customers that demonstrate a balanced approach to social, environmental and developmental impacts and we expect customers to adopt management practices to continuously improve their social and environmental performance. ANZ supports customers that use internationally accepted industry management practices to manage social, environmental and economic impacts (including effects on human rights, biodiversity, cultural heritage, indigenous rights, health and safety, governance and environmental sustainability).

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**4 Other information on palm oil (sustainability reports, policies, other public information)**

Not Applicable to ANZ

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## Particulars

### About Your Organisation

**Organisation Name**BNP Paribas

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**Corporate Website Address**<http://www.bnpparibas.com>

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0013-11-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Investment / Equity
- Debt / Capital Markets
- Capital Market Advisory Service

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### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans
- Treasury Products
- Cash Management Products
- Investment

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#### 2.2 What geographic regions do you operate in for the palm oil business?

- Asia
- Africa
- Worldwide

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### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

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#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors

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#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

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##### 3.3.1 Do you require your customers to be RSPO members?

No

**3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?**

No

**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

We do not require our clients to be RSPO members but the policy clearly says that "BNP Paribas believes that the RSPO has made, and is still making, a major contribution to the adoption of sustainability practices within the palm oil sector, through its wide-reaching, consensus-based, and multi-stakeholder approach. ". If a client does not meet the requirements of our policy on palm oil, we initiate a dialogue to ensure that improvements can be made, to achieve compliance with our policy within an acceptable time-frame. If the client does not comply with our policy and does not show willingness to improve its practices, we would refuse investing or providing financial products or services.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2020

**Comment:**

Apart from encouraging companies to become RSPO members in its CSR sectoral financing and investing policy, BNP Paribas strengthened in 2014 its actions to fight against deforestation with the signature of the "Soft Commodities Compact" which commits the Group to finance the growth in the markets for palm oil, wood products, soya and beef, without causing net deforestation up to 2020. Above their own due diligence processes, the signatory banks ensure that their customers also implement suitable internationally-recognised monitoring means, such as RSPO in the palm oil sector.

**4.3 When do you expect to require 100% certification for other sectors?**

2020

**Comment:**

Apart from encouraging companies to become RSPO members in its CSR sectoral financing and investing policy, BNP Paribas strengthened in 2014 its actions to fight against deforestation with the signature of the "Soft Commodities Compact" which commits the Group to finance the growth in the markets for palm oil, wood products, soya and beef, without causing net deforestation up to 2020. Above their own due diligence processes, the signatory banks ensure that their customers also implement suitable internationally-recognised monitoring means, such as RSPO in the palm oil sector.

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

Extract of our CSR policy: Recognising the importance of multi-stakeholders voluntary approaches such as the RSPO, BNP Paribas recommends that Upstream Palm Oil Companies (plantations and mills): - Become active members of the RSPO, e.g. by regularly reporting on progress and participating to working groups; - Work towards full RSPO certification for their palm oil operations (plantations and mills), as evidenced by a time-bound action plan; - For palm oil mills: engage with third-party suppliers to achieve full RSPO certification of the supply base. BNP Paribas encourages Downstream Palm Oil companies (i.e. refiners and traders) to become active members of the RSPO and maximize the use of RSPO-certified palm oil. Besides, guidelines have been released internally in 2015, to support the policy that was reviewed in 2014 to take into account recent, significant advances in this sector in terms of environmental and societal responsibility, bolstered by new "Non-deforestation" commitments taken by major producers and buyers. Our policy requires customers not to develop plantations on peatlands, to reduce their greenhouse gas emissions and to limit use of pesticides and in particular, Paraquat. Our policy also encourages our customers to adopt and implement the High Carbon Stock analysis. In the societal area, it requires the customer to obtain the free, prior and informed consent of populations impacted by new plantations, as described by the RSPO. It also invites palm oil traders to ensure the traceability of their supply chain and check that their suppliers operate in line with the requirements of this policy.

**GHG Emissions**



**5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

**Uploaded file:**[F-GHG-Public-Report.pdf](#)**Do you publicly report the GHG emissions of your operations?**

Yes

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**Actions for Next Reporting Period****6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

We will keep on assessing companies in the palm oil sector against our CSR financing and investing policy in that field that mention CSPO as an evaluation criteria both for upstream (growers and mills) and downstream (refiners and traders) companies. We will also keep our work within the Banking Environment Initiative Soft Commodities Compact to promote No deforestation policies and commitments, notably with the help of worldwide recognized labels in the commodities sector as RSPO.

**Reasons for Non-Disclosure of Information****7.1 If you have not disclosed any of the above information please indicate the reasons why****Application of Principles & Criteria for all members sectors****8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:**

- Water, land, energy and carbon footprints  
[F-Policies-to-PNC-waterland.pdf](#)
- Land Use Rights  
[F-Policies-to-PNC-landuseright.pdf](#)
- Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
- Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
- Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)

**8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?**

In order to ensure that ESG risk management tools are strictly applied in all entities, the Group has deployed a CSR operational control plan since 2015. After determining the controls to be made by the different business lines and entities of the Group, the CSR and permanent operational control functions created the first working groups tasked with defining the organisation and implementation of the controls throughout the Group's entities. The first periodic controls are to take place in 2016. They will check that the measures put into place at every level are adequate, and will initiate a continuous improvement dynamic, necessary for the proper management of ESG risks.

**8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?**

No

**Please explain why:**

We believe that sustainability is eventually a competitive advantage for our customers, and at this stage we do not believe it is practical to offer varying financial terms and conditions to our customers based on their CSR performance. For instance, a corporate loan can have a long tenor (e.g. 10 years, during which it is not possible to modify the loan agreement), while the CSR performance of a company can improve or worsen very quickly.

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**8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?**

We keep direct dialogue, we listen to any controversial issue that arises from external stakeholders, and if needed we ask an external expert consultant to conduct in-depth on site audit on ESG criteria in order to assess compliance with our CSR policy. Companies which do not comply with our criteria are placed in our monitoring list, with limited access to our products and services and yearly review of their status. In case of significant improvement of their practices, they are removed from that list and all products and services are made available for them. In case of significant breach of our mandatory criteria, the company is asked for quick and effective remediation. If the company cannot change and improve its practices to be in line with our CSR Policy, it is placed in our exclusion list

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**Concession Map****9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)****Do you agree to share your concession maps with the RSPO?**

No

**Please explain why**

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## Challenges

### 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?

1) Economic obstacle: RSPO seems to be in an in-between situation: on one hand, many very important markets do not pay particular importance to environmental labels such as RSPO and growers find strong difficulties in passing-through certification costs when addressing these markets. On the other hand, many Consumer Goods Manufacturers in the European and American markets ask now their providers to comply with environmental standards which go beyond RSPO requirements, such as HCS protection and no deforestation commitment. Addressing these two issues appears to be crucial for RSPO and a necessary preamble to any effort from the financial sector to promote CSPO among its clients. 2) Another important difficulty is, while assessing the ESG performance, to know precisely what the real practices of the company on the ground are. Many different statements and points of view may arise during investigation or audit and we need to clearly state out what's really happening. To mitigate this difficulty we ask, when needed, an external expert consultant to conduct in-depth local audit on ESG criteria in order to assess ESG performance. We also use the documentation made available by the RSPO Complaint panel when a controversy is managed within this process. 3) Some issues have been recently raised regarding the practices of some auditors and have led to concerns about the quality of the RSPO certification. In the same time, as these auditors have seen their accreditation cancelled, this has led to increase the credibility of the RSPO. We believe that the RSPO has made, and is still making, a major contribution to the adoption of sustainability practices within the palm oil sector, through its wide-reaching, consensus-based, and multi-stakeholder approach. We are aware that some companies have taken further steps to lead on the sustainability path by taking unilateral or joint commitments to no deforestation, no development on peat lands, and no development when consent of affected populations has not been obtained. We are fully supportive of these commitments and encourages the diffusion of these practices to other actors. We also positively note the recent development of the RSPO NEXT initiative, and we will be closely following the uptake of this initiative within RSPO members.

### 2 How would you qualify RSPO standards as compared to other parallel standards?

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#### Cost Effective:

No

#### Robust:

Yes

#### Simpler to Comply to:

Yes

### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

BNP Paribas is member of RSPO since 2011 and has been since then fully supporting the vision of RSPO to transform markets by being a responsible financial player in the palm oil sector, based on a public policy including binding ESG criteria and with the help of external auditors to assess the ESG performance of the actors we chose to support. BNP Paribas is also member of the Financial Institution Task Force (FITF): placed under the umbrella of RSPO, this group gathers several banks involved in the palm oil sector and members of RSPO. It has released an outreach document detailing what are the opportunities for a financial player to become RSPO member and where can be found useful information regarding best practices in financing the palm oil sector.

### 4 Other information on palm oil (sustainability reports, policies, other public information)

In 2015, BNP Paribas policy to protect the forests in its financing activities has been rated 5/5 by the Global Canopy Program, an NGO dedicated to combat deforestation. BNP Paribas has been placed as a "Forest Leader" in the top 5 among 150 investors assessed on their forest policies. Please visit <http://forest500.org/rankings/investors/bnp-paribas>

## Particulars

### About Your Organisation

**Organisation Name**

Citi

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**Corporate Website Address**

<http://www.citi.com>

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0011-10-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Debt / Capital Markets
- Capital Market Advisory Service

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans
- Treasury Products
- Cash Management Products

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Asia
- Africa
- South America

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors
- Other:

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

##### 3.3.1 Do you require your customers to be RSPO members?

Yes

##### 3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

We engage in a dialogue with the client to better understand the challenges it faces and to assess its commitment to achieving 100% certified operations.

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**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

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**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

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**4.2 When do you expect to require 100% certification for growers?**

2020

---

**4.3 When do you expect to require 100% certification for other sectors?**

2020

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**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally
  - United States
- 

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

Citi chairs the Financial Institutions Task Force of the RSPO, serves on the RSPO Complaints Panel and supports outreach and engagement with financial institutions on either becoming members of RSPO or taking steps in a direction that will allow them to more easily do so in the future. Additionally, we participate in multi-stakeholder zero-deforestation workshops such as the Innovation Forum. We champion the RSPO as one of the tools for industry to meet zero-deforestation goals. We also support the Indonesian sustainable finance roadmap through trainings to regional banks on our environmental and social due diligence process in the palm oil sector. Additionally, Citi updated its Environmental and Social Policy Framework in October 2015. The update gathered a fair amount of media attention and our commitment to the RSPO is part of the framework.

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**GHG Emissions****5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

**Uploaded file:**

[F-GHG-Public-Report.pdf](#)

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**Do you publicly report the GHG emissions of your operations?**

Yes

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**Actions for Next Reporting Period**

**6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

We will continue to lead the Financial Institutions Task Force, serve on the Complaints Panel and seek opportunities to promote CSPO, in particular during regional forums and workshops that seek to heighten environmental and social risk management capabilities among banks in South East Asia. We will also continue to work with our clients on expanding RSPO certified plantation area and supply chain uptake.

**Reasons for Non-Disclosure of Information****7.1 If you have not disclosed any of the above information please indicate the reasons why****Application of Principles & Criteria for all members sectors****8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:**

- Water, land, energy and carbon footprints  
[F-Policies-to-PNC-waterland.pdf](#)
- Land Use Rights  
[F-Policies-to-PNC-landuseright.pdf](#)
- Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
- Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
- Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)

**8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?**

We will continue to support the outreach efforts of the RSPO to ensure broad uptake of the Principles and Criteria by all actors in the value chain.

**8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?**

No

**Please explain why:**

We only do business with companies that are RSPO members and have a time bound plan for certification

**8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?**

We review the Annual Communication of Progress reports for clients during annual credit reviews. Prior to new transactions, we will engage with the company to better understand its environmental and social performance, and in some cases, we may hire an independent consultant to conduct audits of the company's operations.

**Concession Map****9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)****Do you agree to share your concession maps with the RSPO?**

No

**Please explain why**

Not applicable to Citi. As a financial institution we do not own any palm oil concessions

## Challenges

### 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?

For financial institutions, our main obstacle or challenge in promoting CSPO is competition from local and regional banks that are not RSPO members. Without a level playing field in the financial sector, our leverage to influence clients to adopt RSPO Principles & Criteria is limited. We are mitigating this challenge through outreach that promotes the establishment of environmental and social risk management policies, including those pertaining to palm oil.

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### 2 How would you qualify RSPO standards as compared to other parallel standards?

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#### Cost Effective:

No

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#### Robust:

Yes

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#### Simpler to Comply to:

Yes

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### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

Engagement with key stakeholders; Business to business education/outreach and civil society engagement to promote sustainable small holder production.

---

### 4 Other information on palm oil (sustainability reports, policies, other public information)

Our Environmental Policy Framework can be found here: [http://www.citigroup.com/citi/environment/data/Environmental\\_Policy\\_Framework](http://www.citigroup.com/citi/environment/data/Environmental_Policy_Framework)

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## Particulars

### About Your Organisation

**Organisation Name**

Commerzbank AG

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**Corporate Website Address**

www.commerzbank.com

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0017-14-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Investment / Equity
- Debt / Capital Markets
- Capital Market Advisory Service

---

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans

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#### 2.2 What geographic regions do you operate in for the palm oil business?

- Asia
- Africa

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### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

---

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors
- CGMs
- Retailers

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#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

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##### 3.3.1 Do you require your customers to be RSPO members?

Yes

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##### 3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

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**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

Palm oil supplies, which are accompanied by Commerzbank, have to meet the following criteria: The supplier has to be a member of the RSPO. Additional information on how the palm oil supplier is already implementing sustainability criteria in its supply chain and what goals the company in this respect wants to achieve (e.g. certification) is also required. Finally the Reputational Risk Management conducts an individual ESG-assessment. This means: If one of these criteria is violated, Commerzbank cannot accompany the palm oil supply at issue.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2020

**4.3 When do you expect to require 100% certification for other sectors?**

2020

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

Commerzbank collaborated on various articles concerning sustainable trade and procurement. Further information can be found here: [https://www.commerzbank.de/en/nachhaltigkeit/markt\\_\\_\\_kunden/mittelstand/nachhaltiger\\_handel/nachhaltiger\\_handel.html](https://www.commerzbank.de/en/nachhaltigkeit/markt___kunden/mittelstand/nachhaltiger_handel/nachhaltiger_handel.html)

**GHG Emissions****5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

**Uploaded file:**

[F-GHG-Public-Report.pdf](#)

<https://www.cdp.net/en-US/Results/Pages/Company-Responses.aspx>

**Do you publicly report the GHG emissions of your operations?**

Yes

<https://www.cdp.net/en-US/Results/Pages/Company-Responses.aspx>

**Actions for Next Reporting Period**

**6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

We continue to apply our criteria and the RSPO certification schemes as the minimum acceptable standards for our clients. We participate in the Financial Institutions Task Force, placed under the umbrella of RSPO. Thereby, we intend to contribute to a sustainable development of the palm oil sector as well as to have a positive impact on the support of sustainable production. As a member of the RSPO we admit, among others, to more transparency, long-term orientated economic activities and responsible dealing with the environment, natural resources as well as affected individuals and communities in the palm oil market.

**Reasons for Non-Disclosure of Information**

7.1 If you have not disclosed any of the above information please indicate the reasons why

**Application of Principles & Criteria for all members sectors**

8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:

- Water, land, energy and carbon footprints  
[F-Policies-to-PNC-waterland.pdf](#)
- Land Use Rights  
[F-Policies-to-PNC-landuseright.pdf](#)
- Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
- Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
- Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)

8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?

- We will continue to support the RSPO to ensure broad uptake of the principles and criteria by all actors in the value chain. - Further enforcement of ESG risk management standards.

8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?

Yes

8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?

We engage in a regular dialogue with our clients to better comprehend their environmental and social performance and to support them. Through this exchange we gain a better understanding of their goals and progress.

**Concession Map**

9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)

Do you agree to share your concession maps with the RSPO?

No

Please explain why

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## Challenges

**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?**

- We will continue to rigorously implement ESG-standards (e.g. RSPO-membership, proof of certification, individual ESG-assessment). - Commerzbank may dismiss business to clients that don't have similarly stringent RSPO requirements.

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**2 How would you qualify RSPO standards as compared to other parallel standards?**

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**Cost Effective:**

Yes

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**Robust:**

No

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**Simpler to Comply to:**

Yes

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**3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)**

- Commerzbank participates in the Financial Institutions Task Force of the RSPO. - Ongoing dialogue with our partner banks in South-East-Asia.

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**4 Other information on palm oil (sustainability reports, policies, other public information)**

All important matters have been covered by the previous questions. Further information can be found here:  
[https://www.commerzbank.de/en/nachhaltigkeit/home\\_1/home\\_neu\\_1.html](https://www.commerzbank.de/en/nachhaltigkeit/home_1/home_neu_1.html)

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## Particulars

### About Your Organisation

**Organisation Name**

Credit Suisse AG

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**Corporate Website Address**

<http://www.credit-suisse.com>

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0010-10-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Investment / Equity
- Debt / Capital Markets
- Capital Market Advisory Service

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans
- Treasury Products
- Investment

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Worldwide

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

No files were uploaded

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Processors

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

##### 3.3.1 Do you require your customers to be RSPO members?

Yes

##### 3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

#### 3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?

Engagement and advisory support in the first instance.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2020

**4.3 When do you expect to require 100% certification for other sectors?**

2020

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

Examples of activities include: (1) Supported the 2015 WWF-International publication, "Sustainable finance in Singapore, Indonesia and Malaysia: a Review of Financiers' ESG Practices, Disclosure Standards and Regulations" (2) Participation in the RSPO Financial Industry Task Force group (3) Participation in Technical Advisory Group of the ZSL SPOTT project (4) Ongoing capacity building advisory to business clients to develop a sustainable palm oil strategy (5) We feature the RSPO on our corporate website under 'Agreements & Memberships':

[<https://www.credit-suisse.com/hk/en/about-us/responsibility/banking/agreements-and-memberships.html>]

**GHG Emissions****5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

<https://www.credit-suisse.com/hk/en/about-us/responsibility/environment/climate-protection.html>

**Do you publicly report the GHG emissions of your operations?**

Yes

<https://www.credit-suisse.com/hk/en/about-us/responsibility/environment/climate-protection.html>

**Actions for Next Reporting Period****6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

Actions will include the following: (1) Support WWF-International and the Indonesian OJK with their ESG Integration series of workshops delivered to Indonesian banks, in which oil palm sector issues will be a recurring theme (2) Continued participation in the RSPO Financial Industry Task Force group (3) Continued participation in Technical Advisory Group of the ZSL SPOTT project (4) Ongoing capacity building advisory to business clients to develop a sustainable palm oil strategy

**Reasons for Non-Disclosure of Information**



7.1 If you have not disclosed any of the above information please indicate the reasons why

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## Application of Principles & Criteria for all members sectors

8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:

- Water, land, energy and carbon footprints
- Land Use Rights
- Ethical conduct and human rights
- Labour rights
- Stakeholder engagement

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8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?

Our 'Global Policy - Forestry & Agribusiness' (incorporating palm oil) requires clients to join RSPO, comply with RSPO P&C and develop a roadmap towards CSPO production.

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8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?

No

**Please explain why:**

We do not feel we should need to incentivize companies to operate sustainably when there are clear benefits to them by doing so. However, on a discretionary basis we do offer clients pro bono advisory services to assist them in developing their commitment and capacity in support of the RSPO P&C.

---

8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?

A mix of qualitative evaluation vis-à-vis our 'Global Policy - Forestry & Agribusiness', reference to the RSPO P&C and industry news, reference to web sources such as the ZSL SPOTT project, and through ongoing engagement with a range of social and ecological NGOs and research organizations.

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## Concession Map

9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)

Do you agree to share your concession maps with the RSPO?

No

**Please explain why**

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## Challenges

### 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?

Occasional feedback from our bankers in client / prospect meetings that other global banks and regional banks are not applying ESG standards to deals in the sector, placing ourselves and other RSPO member banks at a competitive disadvantage. There needs to be more work done across RSPO to reward / recognize the efforts of committed members and to pressure other players to join and support a sustainable palm oil industry

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### 2 How would you qualify RSPO standards as compared to other parallel standards?

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#### Cost Effective:

Yes

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#### Robust:

Yes

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#### Simpler to Comply to:

Yes

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### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

Earlier responses refer, e.g., (1) client engagement on strategy development, (2) supporting ESG integration and capacity building among local banks, and (3) global peer engagement through FITF.

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### 4 Other information on palm oil (sustainability reports, policies, other public information)

n/a

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**Particulars**

**About Your Organisation**

**Organisation Name**

HSBC Holdings Plc

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**Corporate Website Address**

www.hsbc.com

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

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**Membership**

Membership Number	Membership Category	Membership Sector
5-0009-04-000-00	Ordinary	Banks and Investors

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**Banks and Investors**

**Operational Profile**

**1.1 Please state what your main activities are within finance\***

- Corporate / Commercial
- Trade Finance
- Investment / Equity
- Debt / Capital Markets
- Capital Market Advisory Service

**Operations in Palm Oil**

**2.1 What are the various types of financial services to the palm oil sector provided by your organization?**

- Trade Solution
- Lending / Loans
- Treasury Products
- Cash Management Products
- Investment
- Insurance
- Other:  
Advisory services for equity / capital markets

**2.2 What geographic regions do you operate in for the palm oil business?**

- Worldwide

**Palm Oil Policy**

**3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?**

Yes

**Uploaded files:**

- [F-Lending-Policy.pdf](#)

**3.2 Which sub-sectors does your palm oil policy cover?**

- Traders
- Other:

**3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?**

Yes

**3.3.1 Do you require your customers to be RSPO members?**

Yes

**3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?**

Yes

**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

HSBC has a policy requirement for our existing clients to have at least 1 operation already certified and the remainder of their existing operations fully certified by DEC2018. New clients with new operations must certify their first operation within 12 months and 100% of their operations within 4 years. If any customer is not meeting our policy, HSBC will engage with them to take actions to ensure they can achieve compliance within an agreed time period. Failure to meet the agreed timebound plans to achieve certification and compliance with our policy will lead to HSBC exiting from a specific client relationship.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2018

**Comment:**

HSBC has adopted 31DEC2018 as the deadline for 100% certification for our customers with existing plantations. Any new and additional mills constructed or new operations are to be 100% certified within a maximum of 4 years from date of construction

**4.3 When do you expect to require 100% certification for other sectors?**

2018

**Comment:**

HSBC has adopted 31DEC2018 as the deadline for 100% certification for our existing customers in the supply chain businesses as covered within our policy (refiners & physical traders) ..

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

HSBC engages in ongoing dialogue with our clients and promotes RSPO/CSPO at industry events and conferences, supporting the benefits of RSPO certification and sustainable palm oil development. HSBC currently provides discounted financing to clients purchasing or selling RSPO Certified Sustainable Palm Oil (CSPO) through structured trade facilities to incentivize increased trading and uptake of CSPO. HSBC is taking a leading role in the RSPO through technical working groups and representing the financial sector on the Board of Governors to improve standards, transparency and strengthen processes to accelerate the transition to CSPO becoming the norm. HSBC has promoted RSPO and CSPO to evidence sustainable operations and practices at several external conferences and industry seminars.

**GHG Emissions**

**5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

**Uploaded file:**[F-GHG-Public-Report.pdf](#)[www.hsbc.com/citizenship/sustainability/operations](http://www.hsbc.com/citizenship/sustainability/operations)

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**Do you publicly report the GHG emissions of your operations?**Yes

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[www.hsbc.com/citizenship/sustainability/operations](http://www.hsbc.com/citizenship/sustainability/operations)

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**Actions for Next Reporting Period****6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

HSBC continues to offer the discounted financing programme for the trade of certified sustainable palm oil (CSPO) for both buyers and sellers. HSBC works with our client base and prospective clients to promote RSPO and CSPO as a way of evidencing sustainable operations and managing their risks.

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**Reasons for Non-Disclosure of Information****7.1 If you have not disclosed any of the above information please indicate the reasons why**

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**Application of Principles & Criteria for all members sectors****8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:**

- Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
- 

**8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?**

Financial organisations are not directly involved in the production, processing or trading of palm oil products. HSBC's policies are therefore directed to the role that banks play in providing financial services to their clients across the palm oil supply chain. HSBC is a founder member of the group of Banks that established and adopted the Equator Principles to manage the impact on local people and environments from large projects. HSBC has public sustainability policies that cover sectors where we need to understand and manage the impact on society and the environment where we are providing financial services to our customers. In 2006 HSBC signed up to the UN Principles for Responsible Investment. We have also joined the UN Environment Programme Finance Initiative. Most recently in 2013 we signed up to the UN Principles of Sustainable Insurance.

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**8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?**Yes

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**8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?**

HSBC Group employs a sustainability benchmark and assessment exercise on all customers where sustainability risks exist, including the palm oil sector. This is undertaken against the requirements contained within our Agricultural Commodities policy and as required, the Equator Principles. Benchmarking is undertaken at least on an annual basis.

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**Concession Map**

ACOP Sectoral Report - Banks and Investors

**9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)**

**Do you agree to share your concession maps with the RSPO?**

No

**Please explain why**

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## Challenges

### 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?

1. Lower demand for CSPO from major buying markets (particularly China, India and SE Asia) where local consumption has limited preference for CSPO. 2. Current premium paid for Green Palm certificates is insufficient financial incentive for small growers to invest in certification. 3. Low transparency in sales of CSPO sold as ISCC dual certified product but not reported in RSPO figures for sustainable palm oil grown. 4. Promotion of the benefits of CSPO and RSPO certification process needs further development in the major buying markets to drive awareness and demand.

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### 2 How would you qualify RSPO standards as compared to other parallel standards?

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#### Cost Effective:

Yes

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#### Robust:

Yes

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#### Simpler to Comply to:

No

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### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

HSBC provides discounted financing to clients purchasing or selling RSPO Certified Palm Oil (CSPO), to incentivize trade in sustainable palm oil and encourage more clients to achieve RSPO certification. HSBC references our support of credible certification scheme, such as RSPO, at external events and conferences to promote sustainable business and certification uptake. HSBC is working with several customers to promote outreach to FFB suppliers and how to increase certification uptake in this area.

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### 4 Other information on palm oil (sustainability reports, policies, other public information)

HSBC position on Palm Oil and sustainability policies can be found online at the following website: <http://www.hsbc.com/citizenship/sustainability/finance/forestry-and-agricultural-commodities>

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## Particulars

### About Your Organisation

**Organisation Name**ING Bank N.V.

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**Corporate Website Address**www.ing.com

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0019-15-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking

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### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans

---

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Worldwide

---

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

---

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors

---

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

---

##### 3.3.1 Do you require your customers to be RSPO members?

No

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##### 3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

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**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

ING applies an Environmental Social Risk (ESR) policy framework to its business engagements. One policy in the ESR framework is the Sector Policy for Forestry and Agrocommodities, which applies to all products and services offered by ING to entities operating in the forestry and agrocommodities sector, including palm oil. 1) Business engagements in the palm oil sector will require companies that own, operate or manage palm oil plantations to demonstrate to the satisfaction of ING compliance with RSPO certification. The answer "Yes" at 3.3.2 refers therefore to this type of companies. This means that companies that own, operate or manage palm oil plantations will have to describe how they operate in line with the P&C of the RSPO. If a company owns, operates or manages palm oil plantations which do not comply with the RSPO certification, then ING engages the company on the reasons for such non-compliance. Afterwards, we require the company to have a time-bound plan to achieve RSPO certification for all the plantations under its operational control. We will then assess the client's commitment and progress towards full RSPO certification. In case our financing is in scope of the Equator Principles and directly supporting the development of palm oil plantations, ING requires compliance with the P&C of the RSPO certification and with the IFC environmental, health, and safety guidelines for vegetable oil production and processing. In these cases, we cover impacts on the areas mentioned in the answers shown later at point 8.1, if applicable to the specific plantation. 2) ING promotes the use of best practices with its clients. ING also promotes the RSPO certification with companies that buy or trade palm oil products, but do not own, operate or manage palm oil plantations. For such companies ING promotes RSPO membership, but we do not require it. Therefore, the answer "No" at 3.3.1 refers to companies that do not own, operate or manage palm oil plantations.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2020

**Comment:**

All our customers that own, operate or manage palm oil plantations are RSPO members or are in the process of getting RSPO certification for all their plantations. When we collaborate with plantation owners, we strive to work towards a plan in which we require them to have all their plantations certified within a commonly agreed date. However such date changes according to the specific operational situation of the company. So the date indicated in the answer 4.2 ("2020"), is only an indicative date.

**4.3 When do you expect to require 100% certification for other sectors?**

2030

**Comment:**

ING has not specified a date for 100% certification for companies operating in "other sectors". The date mentioned under the answer 4.3 ("2030") is therefore indicative. Although ING collaborates with non-growers in the palm oil supply chain (e.g. traders, processors, manufacturers, wholesalers or retailers), the certification commitments of such companies depend on how effectively they implement such requirements. Downstream companies can exercise positive influence on the palm oil supply chain, however this depends on their market position and advancement on sustainability commitments.

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

Engagement 1) ING has resources in risk and front office departments that are trained to engage clients in the palm oil sector and discuss relevant topics, when necessary. We discuss how we can support clients in realising their RSPO certification objectives and solve potential environmental or social issues affecting their operations. 2) ING participated in two conferences of the EPOA (European Palm Oil Alliance) in Amsterdam and Milan during 2015. These conferences explored tools to support the EU uptake of 100% CSPO within 2020. Here we exchanged knowledge and ideas on how to increase CSPO uptake. We support the active role of the financial sector to support this result. 3) Collaboration with the Dutch Government ING is also liaising with the Dutch Government to find solutions to reach the objective of 100% CSPO sourced by the EU within 2020. Financial Institution Task Force ING is a member of the Financial Institutions Task Force working group of the RSPO. Here Financial Institutions share sector knowledge and feedback on board discussions. The Task Force also does outreach to local regional operating banks and hosts consultants that share advancements related to tools to manage and assess Environmental and Social risks in the palm oil supply chain.

**GHG Emissions****5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

**Uploaded file:**

[F-GHG-Public-Report.pdf](#)

[www.ing.com/web/file?uuid=edb1ce3f-532f-4ddb-a58f-c91c6212d37e&owner=b03bc017-e0db-4b5d-abbf-003b12934429&contentid=36989](http://www.ing.com/web/file?uuid=edb1ce3f-532f-4ddb-a58f-c91c6212d37e&owner=b03bc017-e0db-4b5d-abbf-003b12934429&contentid=36989)

**Do you publicly report the GHG emissions of your operations?**

Yes

[www.ing.com/web/file?uuid=edb1ce3f-532f-4ddb-a58f-c91c6212d37e&owner=b03bc017-e0db-4b5d-abbf-003b12934429&contentid=36989](http://www.ing.com/web/file?uuid=edb1ce3f-532f-4ddb-a58f-c91c6212d37e&owner=b03bc017-e0db-4b5d-abbf-003b12934429&contentid=36989)

**Actions for Next Reporting Period****6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

ING will continue to support the objectives of the RSPO by promoting RSPO membership and certification amongst the palm oil actors in the supply chain and the Financial Institution sector, especially for local stakeholders.

**Reasons for Non-Disclosure of Information****7.1 If you have not disclosed any of the above information please indicate the reasons why****Application of Principles & Criteria for all members sectors****8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:**

- Water, land, energy and carbon footprints
- Land Use Rights
- Ethical conduct and human rights
- Labour rights
- Stakeholder engagement

**8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?**

Financial institutions are not directly involved in the production, processing or trading of palm oil products. ING ESR policies are directed to manage the Environmental Social risks linked to financial services we provide to our clients in the palm oil supply chain. We are committed to engage clients in the palm oil supply chain whenever there are improvements to be made from an Environmental and Social perspective.

---

**8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?**

No

**Please explain why:**

ING clients operating or owning palm oil plantations have to commit to comply with the P&C of the RSPO. Currently we do not provide incentives to such companies.

---

**8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?**

We apply the ING ESR framework to all customers as benchmark, including to clients in the palm oil sector. This is done through our Forestry and Agricommodities policy and the Equator Principles. Benchmarking is undertaken at least annually during the annual review of our clients' performance. When necessary, we also assess progress through direct client interaction and publicly available information. Our internal processes apply a client assessment covering how well the company is managing its Environmental and Social impacts. This process apply to all new and existing corporate clients. Through this assessment, we benchmark the organisation against the ING ESR Framework and against its RSPO commitments, if the company operates palm oil plantations. Additionally, our internal processes cover the assessment of the Environmental and Social risks triggered by all lending transactions to corporations active in the palm oil sector. Through this assessment, we benchmark the purpose of our transactions against the ING ESR Framework and against its RSPO commitments.

---

**Concession Map****9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)****Do you agree to share your concession maps with the RSPO?**

No

**Please explain why**

We do not own concession maps, as Financial Institutions are not directly involved in the production or processing of palm oil products.

---

## Challenges

### 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?

The demand of Palm Oil from Asian countries is rising constantly and this demand covers now a significant part of Palm Oil products sold. We see the uptake of CSPO in Asian countries (e.g. China, India) as an obstacle to increase the use and procurement of CSPO. We are also seeing challenges linked to the capacity of the RSPO to certify a growing number of plantations and monitoring the performance of the plantations already certified. This challenge is linked to the fact that the capacity of the auditing companies has to be increased. In addition to the two EPOA conferences, ING also participated to the November RSPO AGM meeting of 2015. These occasions and the active participation in the RSPO FITF allows us to support initiatives and tools that can increase use, trade and production of CSPO. We will remain engaged with these initiatives to share knowledge and support these efforts.

### 2 How would you qualify RSPO standards as compared to other parallel standards?

--

#### Cost Effective:

Yes

#### Robust:

Yes

#### Simpler to Comply to:

Yes

### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

Please see above answers at points 4.5; 8.1 and 'Challenges" (1.).

### 4 Other information on palm oil (sustainability reports, policies, other public information)

Nil

## Particulars

### About Your Organisation

**Organisation Name**

International Finance Corporation (IFC)

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**Corporate Website Address**

<http://www.ifc.org/>

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0002-05-000-00	Ordinary	Banks and Investors

---

## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Investment / Equity
- Capital Market Advisory Service

---

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans
- Investment

---

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Asia
- Africa
- China
- India
- South America

---

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

---

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors

---

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

---

##### 3.3.1 Do you require your customers to be RSPO members?

Yes

---

##### 3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

---



**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

Generally potential clients whom are not RSPO members will be recommended to join RSPO. IFC then would expect the firm to follow the RSPO Codes of Conduct.

---

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

---

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

---

**4.2 When do you expect to require 100% certification for growers?**

2018

**Comment:**

This is for clients that we would commence investing in during 2016. We would typically give them a period of time to become compliant with industry standards such as RSPO (generally 2-3 years)

---

**4.3 When do you expect to require 100% certification for other sectors?**

2020

**Comment:**

as per many company sustainable sourcing commitments

---

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally
  - United States
- 

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

IFC developed a sustainable shipment LC for RSPO certified palm oil. We are looking how to promote this more widely in 2016. IFC's Short Term Trade finance credit lines to other banks use a risk-based tool called GMAP (see [www.ifc.org/gmap](http://www.ifc.org/gmap)) GMAP relies on certification data from RSPO as part of how firms can improve their specific risk score when banks are doing the analysis.

---

**GHG Emissions****5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

**Uploaded file:**

[F-GHG-Public-Report.pdf](#)

[http://www.ifc.org/wps/wcm/connect/4d57318049faf97d9257b3e54d141794/IFC\\_AR15\\_Full\\_Volume1.pdf](http://www.ifc.org/wps/wcm/connect/4d57318049faf97d9257b3e54d141794/IFC_AR15_Full_Volume1.pdf)

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**Do you publicly report the GHG emissions of your operations?**

Yes

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[http://www.ifc.org/wps/wcm/connect/4d57318049faf97d9257b3e54d141794/IFC\\_AR15\\_Full\\_Volume1.pdf](http://www.ifc.org/wps/wcm/connect/4d57318049faf97d9257b3e54d141794/IFC_AR15_Full_Volume1.pdf)

## Actions for Next Reporting Period

### 6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:

We will be working on the GEF Commodities program which includes palm oil in Indonesia and Liberia. We will work to promote Sustainable Shipment LCs globally IFC have an ongoing advisory project working with a company on building the capacity of independent smallholders in Indonesia. Currently approximately 1,000 farmers are engaged with the program but it plans to scale up over the next 3 years.

## Reasons for Non-Disclosure of Information

### 7.1 If you have not disclosed any of the above information please indicate the reasons why

## Application of Principles & Criteria for all members sectors

### 8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:

- Water, land, energy and carbon footprints  
[F-Policies-to-PNC-waterland.pdf](#)
- Land Use Rights  
[F-Policies-to-PNC-landuseright.pdf](#)
- Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
- Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
- Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)

### 8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?

IFC has the CAO function that is the internal watchdog for IFC investments. IFC also has a set of policy's regarding staff integrity and complaints against staff can be lodged via the internal justice system of the World Bank Group.

### 8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?

Yes

### 8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?

When conducting the appraisal on the project IFC will develop an environmental social action plan (ESAP) and this will be monitoring at least yearly through the lifetime of the loan/investment.

## Concession Map

### 9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)

#### Do you agree to share your concession maps with the RSPO?

No

#### Please explain why

IFC is a financier of companies and traders and does not hold any concessions itself.

## Challenges

### 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?

The inclusion of independent smallholders and smaller plantation owners (e.g. above 50 ha) remains a major hurdle. As part of the GEF project we will look to do the business case for adoption for independent smallholders in Indonesia and over time look to develop an appropriate financial product for this.

---

### 2 How would you qualify RSPO standards as compared to other parallel standards?

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#### Cost Effective:

Yes

---

#### Robust:

Yes

---

#### Simpler to Comply to:

No

---

### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

We undertake advisory projects in Indonesia and are involved in projects in Colombia and scoping in Liberia.

---

### 4 Other information on palm oil (sustainability reports, policies, other public information)

[www.sectortransformation.com](http://www.sectortransformation.com) provides an overview of the Indonesia palm oil sector and a road map for sector transformation.

---

## Particulars

### About Your Organisation

**Organisation Name**

Rabobank International

---

**Corporate Website Address**

<http://www.rabobank.com>

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0001-04-000-00	Ordinary	Banks and Investors

---

## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
  - Trade Finance
  - Retail / Private Banking
  - Investment / Equity
  - Debt / Capital Markets
  - Capital Market Advisory Service
- 

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
  - Lending / Loans
  - Treasury Products
  - Cash Management Products
  - Investment
- 

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Worldwide
- 

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)
- 

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
  - Processors
  - CGMs
  - Retailers
- 

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

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##### 3.3.1 Do you require your customers to be RSPO members?

Yes

---

**3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?**

Yes

**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

Commitment to the principles and criteria of the RSPO is relevant. The client needs to show and prove (audited by accredited RSPO auditor) it is operating in line with these P&C. Our review process amongst others requires assessing client's latest ACOP submission. Of which we will assess the client's commitment and progress towards full certification. In the event a client do not meet the requirements, we will engage with the client and find out the reasons for not complying. Our risk chain will assess the response and appropriate action will be taken to exit the relationship if we do not find the client willing to work towards a sustainable path.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2020

**Comment:**

4.1 : 100% of our palm oil customers (with plantations) are RSPO member. This is already the case. They are in a process of getting certified. 4.2 : We strive to work towards a plan in which we require clients to have all their plantations certified in 2020. We also have committed this in the Banking Environment Initiative soft commodities compact.

**4.3 When do you expect to require 100% certification for other sectors?**

2025

**Comment:**

Rabobank has not specified a date for 100% certification in other sectors. The date of 2025 mentioned under 4.3 is therefore not correct. Rabobank's policy for non growers or mills (ie. traders, processors, manufacturers, wholesalers or retailers) in the palm oil supply chain will be assessed on how the players take their responsibilities in the supply chain. We believe that the extent these downstream companies can exercise influence on sustainability issues depend among other things on their role and impact in the supply chain.

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally
- Netherlands

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

Engagement Appointed a engagement manager to further discuss with clients topics covered in the media and how we can support them in realizing their objectives. Successfully stimulated clients to become a member of the RSPO BoG Rabobank is representing the FI sector in the Board of Governors of the RSPO WWF Partnership Through our global partnership with WWF we have organized technical workshops for a client on the RSPO requirements (with RILo office) and the steps they need to take to get their estates certified. FI Task Force Member of the FI taskforce under the RSPO in which knowledge is exchanged, feedback is provided on broad discussions and outreach to local regional operating banks is organized. BEI Adopter of the banking environment initiative with 7 other banks, promoting sustainability in beef, palm oil, soy and forestry. Working with the consumer goods forum on steps to transform the market. BoG NL Quarterly meetings with Dutch Board members, working on supporting sustainable palm oil in EU (100% in 2020) Farmer Support Program Member of steering committee for farmer support program stimulating sustainable production under smallholders for different commodities including palm oil. Taskforces Member certifications & claims committee. Financial standing committee, RSPO Human Rights TF. Presentations Representing / Presenting the RSPO at numerous internal events and conferences (ie. RT13, ISEAL)

**GHG Emissions**

**5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

<https://www.rabobank.com/en/images/rabobank-annual-report-2015.pdf>

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**Do you publicly report the GHG emissions of your operations?**

Yes

<https://www.rabobank.com/en/images/rabobank-annual-report-2015.pdf>

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**Actions for Next Reporting Period****6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**We will continue our activities as described 4.5.

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**Reasons for Non-Disclosure of Information****7.1 If you have not disclosed any of the above information please indicate the reasons why**

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**Application of Principles & Criteria for all members sectors****8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:**

- Water, land, energy and carbon footprints  
[F-Policies-to-PNC-waterland.pdf](#)
  - Land Use Rights  
[F-Policies-to-PNC-landuseright.pdf](#)
  - Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
  - Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
  - Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)
- 

**8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?**N.A.

---

**8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?**Yes

---

**8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?**We check on membership of the RSPO, the ACOP, the timebound plan, public websites and most importantly our direct interaction with the clients.

---

**Concession Map**

**9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)**

**Do you agree to share your concession maps with the RSPO?**

No

**Please explain why**

--

---



## Challenges

**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?**

N.A.

---

**2 How would you qualify RSPO standards as compared to other parallel standards?**

--

---

**Cost Effective:**

Yes

---

**Robust:**

Yes

---

**Simpler to Comply to:**

Yes

---

**3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)**

see activities described in the previous section, BoG member, member TF, BEI, FITF, promoting in presentations.

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**4 Other information on palm oil (sustainability reports, policies, other public information)**

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## Particulars

### About Your Organisation

**Organisation Name**

Standard Chartered Bank

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**Corporate Website Address**

<http://www.sc.com>

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**

No

---

### Membership

Membership Number	Membership Category	Membership Sector
5-0004-06-000-00	Ordinary	Banks and Investors

---

## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Investment / Equity
- Debt / Capital Markets
- Capital Market Advisory Service
- Other:  
FX/ Commodity Risk Hedging solutions

---

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans
- Treasury Products
- Cash Management Products
- Investment
- Other:  
FX/ Commodity Risk Hedging solutions

---

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Worldwide

---

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

---

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors

---

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

---

##### 3.3.1 Do you require your customers to be RSPO members?

No

**3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?**

No

**3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?**

As part of Standard Chartered's commitment to help our clients towards higher standards of sustainable development, our Relationship Managers supported by internal environmental and social specialists, and independent consultants as required, will work closely with clients who do not currently meet the standards set out in our Palm Oil Position Statement, to develop a time-bound action plan for compliance and to monitor the client's progress against that plan. In cases where clients are unable or unwilling to comply with our requirements or agree to an action plan to address gaps with our requirements, we will terminate the relationship.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2025

**Comment:**

Based on our internal review, 2025 should give all our grower clients sufficient time to fully certify their current operations.

**4.3 When do you expect to require 100% certification for other sectors?**

2025

**Comment:**

Based on our internal review, 2025 should give all our other sector clients sufficient time to fully certify their current operations.

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

We continue to be actively involved in the Financial Institutions Task Force (FITF), which meets regularly and supports initiatives to promote the awareness of RSPO. We are also in regular dialogue with the regional banking regulators, including ABS and OJK, to promote responsible lending. We have also joined the Banking Environment Initiative (BEI) Soft Commodities Compact, which aims to achieve zero net deforestation by 2020.

**GHG Emissions****5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

[www.sc.com/en/resources/global-en/pdf/annual\\_reports/annual\\_report\\_2015\\_sustainability\\_summary.pdf](http://www.sc.com/en/resources/global-en/pdf/annual_reports/annual_report_2015_sustainability_summary.pdf)

**Do you publicly report the GHG emissions of your operations?**

Yes

[www.sc.com/en/resources/global-en/pdf/annual\\_reports/annual\\_report\\_2015\\_sustainability\\_summary.pdf](http://www.sc.com/en/resources/global-en/pdf/annual_reports/annual_report_2015_sustainability_summary.pdf)

## Actions for Next Reporting Period

### 6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:

We will continue to apply the Bank's policies and procedures for all our palm oil industry clients. We participate actively in delivering the objectives of the BEI Soft Commodities Compact alongside the other member-banks of the BEI. This includes developing ways to encourage the trade of sustainably-produced palm oil, primarily through the Sustainable Shipment Letter of Credit. We are also working with ABS to implement their Responsible Lending Guidelines published in Oct 2015, by engaging with local and regional banks to build awareness and capacity.

## Reasons for Non-Disclosure of Information

### 7.1 If you have not disclosed any of the above information please indicate the reasons why

## Application of Principles & Criteria for all members sectors

### 8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:

- Water, land, energy and carbon footprints  
[F-Policies-to-PNC-waterland.pdf](#)
- Land Use Rights  
[F-Policies-to-PNC-landuseright.pdf](#)
- Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
- Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
- Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)

### 8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?

As set out in our Human Rights Policy, we respect human rights in our operations and adhere to relevant international and local legal obligations in the countries where we operate. Human rights are taken into account in our procurement decisions, as set out in our Supplier Charter. We also consider human rights in our financing decisions guided by our Position Statements, which address the rights of workers and communities in relation to sectors with specific risks, as well as specifically covering Children's Rights. We are working through the Thun Group of Banks and the UNEP FI network to achieve consensus and promote best practice on human rights due diligence within the financial services industry.

### 8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?

No

#### Please explain why:

We have joined the BEI which is working to develop incentives to promote the growth of sustainably produced commodities, including for palm oil. As discussed in Q6.1, BEI is trying to encourage the trade of sustainably-produced palm oil via the deployment of the Sustainable Shipment Letter of Credit, which references RSPO as the benchmark.

### 8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?

We have developed sector-specific environmental and social risk assessment (ESRA) tools for clients and certain transactions, which include a series of questions regarding a client's operations and ability to manage environmental & social risks. ESRA's help us assess a client's performance against industry peers, build a long-term view of their ability and capacity to manage E&S risks and associated challenges, and compliance with our position statement. It includes consideration of our clients' track record in complying with relevant laws and regulations along with their E&S management systems, and their plan and strategy for reducing greenhouse gas emissions and water conservation and pollution. In cases where we are not satisfied with the information that was provided, we will on an ad hoc basis request for an audit by an independent assessor. We also conduct regular outreach to clients as well as portfolio reviews as required.

**9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)**

**Do you agree to share your concession maps with the RSPO?**

No

**Please explain why**

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## Challenges

### 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?

We have engaged our clients to ensure that they are meeting the RSPO membership rules and requirements and noted that some of these can be better articulated, clarified, enhanced and enforced. We will continue to discuss with RSPO via FITF to ensure that RSPO and RSPO certification become more robust, thorough, equitable and transparent, including to publish names of members who failed to meet RSPO requirements so that we can engage our clients, if any, to encourage compliance.

### 2 How would you qualify RSPO standards as compared to other parallel standards?

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#### Cost Effective:

Yes

#### Robust:

Yes

#### Simpler to Comply to:

No

### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

Standard Chartered is an active member of the RSPO FITF. Through knowledge sharing and exchange, we aim to encourage other financial institutions, especially the local banks, to join the RSPO.

### 4 Other information on palm oil (sustainability reports, policies, other public information)

1. Palm Oil Position Statement ([https://www.sc.com/en/resources/global-en/pdf/sustainability/Palm\\_Oil\\_Position\\_Statement.pdf](https://www.sc.com/en/resources/global-en/pdf/sustainability/Palm_Oil_Position_Statement.pdf)) 2. Integrated Annual Report 2015 ([https://www.sc.com/en/resources/global-en/pdf/annual\\_reports/annual\\_report\\_2015\\_full\\_report.pdf](https://www.sc.com/en/resources/global-en/pdf/annual_reports/annual_report_2015_full_report.pdf)) 3. SCB Sustainability Summary ([https://www.sc.com/en/resources/global-en/pdf/annual\\_reports/annual\\_report\\_2015\\_sustainability\\_summary.pdf](https://www.sc.com/en/resources/global-en/pdf/annual_reports/annual_report_2015_sustainability_summary.pdf)) 4. SCB Environmental and Social Risk Management Framework ([https://www.sc.com/en/resources/global-en/pdf/sustainability/Environmental\\_and\\_Social\\_Risk\\_Assessment.pdf](https://www.sc.com/en/resources/global-en/pdf/sustainability/Environmental_and_Social_Risk_Assessment.pdf))

## Particulars

### About Your Organisation

**Organisation Name**UBS AG

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**Corporate Website Address**--

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**Primary Activity or Product**

- Finance
- 

**Related Company(ies)**No

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### Membership

Membership Number	Membership Category	Membership Sector
5-0014-11-000-00	Ordinary	Banks and Investors

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## Banks and Investors

### Operational Profile

#### 1.1 Please state what your main activities are within finance\*

- Corporate / Commercial
- Trade Finance
- Retail / Private Banking
- Investment / Equity
- Debt / Capital Markets
- Capital Market Advisory Service

### Operations in Palm Oil

#### 2.1 What are the various types of financial services to the palm oil sector provided by your organization?

- Trade Solution
- Lending / Loans
- Investment

#### 2.2 What geographic regions do you operate in for the palm oil business?

- Worldwide

### Palm Oil Policy

#### 3.1 Does your organization have a lending or investment policy on palm oil? If so please submit a copy as a pdf?

Yes

##### Uploaded files:

- [F-Lending-Policy.pdf](#)

#### 3.2 Which sub-sectors does your palm oil policy cover?

- Traders
- Processors

#### 3.3 Does the policy on palm oil make specific reference to RSPO certified sustainable palm oil and/or RSPO certification?

Yes

##### 3.3.1 Do you require your customers to be RSPO members?

Yes

##### 3.3.2 Do you require your customers to have a public Time-Bound Plan for 100% RSPO certification?

Yes

#### 3.4 What measures do you take if a client is not meeting the requirement of your policy on palm oil?

Engage or decline relationship/trade.

**3.5 Do you proactively engage with your customers to support and ask them to join the RSPO?**

Yes

**Time-Bound Plan****4.1 Do you have, or do you plan to develop a policy that calls for 100% of your palm oil customers to be RSPO members?**

Yes

**4.2 When do you expect to require 100% certification for growers?**

2020

**4.3 When do you expect to require 100% certification for other sectors?**

2020

**4.4 Which countries that your institution operates in do the above commitments cover?**

- Applies Globally
- Switzerland

**4.5 What other commitments & activities have you undertaken in the reporting year to promote CSPO?**

- Led effort within RSPO's Financial Institutions Task Force to increase engagement with financial institutions (non-members) & attract more members from the Financial Institutions community - Work as a member of the RSPO's Complaints Panel - Stakeholder meetings with NGOs to discuss specific palm oil companies - Continuous work with and on the Banking Environment Initiative's and the Consumer Goods Forum's 'Soft Commodities' Compact. The Compact clearly references the RSPO as the relevant certification scheme in the palm oil industry to support the goal of 'zero net deforestation'.

**GHG Emissions****5.1 Are you currently assessing the GHG emissions from your operations?**

Yes

**Do you publicly report the GHG emissions of your operations?**

Yes

[www.ubs.com/global/en/about\\_ubs/corporate\\_responsibility/how-we-do-business/protecting-people-and-planet/in-house-environmental-management](http://www.ubs.com/global/en/about_ubs/corporate_responsibility/how-we-do-business/protecting-people-and-planet/in-house-environmental-management)

**Do you publicly report the GHG emissions of your operations?**

Yes

[www.ubs.com/global/en/about\\_ubs/corporate\\_responsibility/how-we-do-business/protecting-people-and-planet/in-house-environmental-management](http://www.ubs.com/global/en/about_ubs/corporate_responsibility/how-we-do-business/protecting-people-and-planet/in-house-environmental-management)

**Actions for Next Reporting Period****6.1 Outline actions that will be taken in the coming year to promote CSPO along the supply chain:**

Encourage regional banks in palm oil producing countries to join RSPO; Further strengthen our engagement with RSPO and peers; Foster exchange with other Financial Institutions and corporations on palm oil topic; Work with the Indonesian financial regulator OJK to train the eight biggest banks of the country in environmental & social risk management, along the lines of an upcoming regulation to avoid environmentally-damaging lending from 2018 onwards .

**Reasons for Non-Disclosure of Information**

7.1 If you have not disclosed any of the above information please indicate the reasons why

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## Application of Principles & Criteria for all members sectors

8.1 Regarding your investment policies, do you have position statements and/or policies related to dealings in the palm oil industry that are in line with RSPO P&C, such as:

- Water, land, energy and carbon footprints  
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[F-Policies-to-PNC-landuseright.pdf](#)
- Ethical conduct and human rights  
[F-Policies-to-PNC-ethicalconducthr.pdf](#)
- Labour rights  
[F-Policies-to-PNC-laborrights.pdf](#)
- Stakeholder engagement  
[F-Policies-to-PNC-stakeholderengagement.pdf](#)

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8.2 What steps will your organization take to realize ethical conduct using business-applicable regulations and industry practices?

UBS will continue to apply an environmental & social risk framework to all transactions, products, services and activities in order to identify and assess potential environmental and social issues and to manage any identified risks. As part of this process, UBS will engage with clients and suppliers in order to understand their processes and policies and to explore how environmental and social risks may be mitigated. UBS avoids transactions, products, services, activities or suppliers if there are material environmental or social risks that cannot be properly assessed or where, in the judgment of UBS, the counterparty/ issuer is not addressing environmental or social issues in an appropriate and responsible manner.

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8.3 Do you provide financial or other incentives for companies that are RSPO member and have a time bound plan?

No

**Please explain why:**

We only provide financial services to growers / processors that are RSPO members and have a publicly available/accessible time bound plan.

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8.4 How does your organization benchmark the progress of its partners and/or clients in palm oil against its ESG criteria?

Integration of environmental and social risk criteria with specific palm oil guidance in all onboarding, KYC and transaction due diligence globally. Clients as well as peer activities are part of the monitoring and reporting.

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## Concession Map

9.1 This questions only applies for companies who would like to declare concession boundaries owned. (both RSPO Certified and uncertified)

Do you agree to share your concession maps with the RSPO?

No

**Please explain why**

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## Challenges

### 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?

UBS may be losing business to banks that don't have similarly stringent RSPO requirements. Availability of reliable data on companies' overall sustainability performance or compliance with RSPO? Efforts to mitigate: continuous exchange with data providers, engagement with peer banks and RSPO to approach issues from an industry perspective.

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### 2 How would you qualify RSPO standards as compared to other parallel standards?

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#### Cost Effective:

Yes

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#### Robust:

Yes

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#### Simpler to Comply to:

No

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### 3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

As outlined above UBS will continue to apply an environmental & social risk framework to all transactions, products, services and activities in order to identify and assess potential environmental and social issues and to manage any identified risks. As part of this process, UBS will engage with clients and suppliers in order to understand their processes and policies and to explore how environmental and social risks may be mitigated. UBS will further work on the implementation of the BEI/CGF 'Soft Commodities Compact', together with other banks and its clients. UBS avoids transactions, products, services, activities or suppliers if there are material environmental or social risks that cannot be properly assessed or where, in the judgment of UBS, the counter party/ issuer is not addressing environmental or social issues in an appropriate and responsible manner. Additionally we will continue to engage with our peers and other FIs to spread the RSPO message further.

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### 4 Other information on palm oil (sustainability reports, policies, other public information)

n/a

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The RSPO is an international non-profit organization formed in 2004 with the objective to promote the growth and use of sustainable oil palm products through credible global standards and engagement of stakeholders.

[www.rspo.org](http://www.rspo.org)

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**RSPO**

Roundtable on Sustainable Palm Oil

