



Independent External Monitoring Agriculture Report, Year 2023

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

Company	ofi
Country	Nigeria
Crop	Cocoa
Production process	Harvesting
Assessment location	Nigeria: Cross River, Osun state, and Ogun state
Monitor	Ethical Trade Services Africa Ltd. (E.T.S.A)
Assessment dates	10/11/2023 - 24/11/2023
Number of assessed farms	121
Total area covered	443.25 ha
Number of farmers interviewed	121
Total number of workers	1073
Number of workers interviewed	1

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In Compliance	
	ER.2.1 (PR)	In compliance	
	ER.2.1.1 (PR)	In compliance	
Recruitment and Hiring	ER.3.1	Noncompliance	in all farms
	ER.3.1.1	Noncompliance	In all farms
	ER.3.1.2	Noncompliance	In all farms
	ER.4	Not Applicable	
	ER.5.1	Not Applicable	
	ER.5.2	Not Applicable	
	ER.5.3	In Compliance	
	ER.6 (PR)	Not initiated	
	ER.7.1	In Compliance	
	ER.7.2	Not Applicable	
	ER.7.3	In Compliance	
	ER.7.4	Not Applicable	
	ER.7.5	In Compliance	
	ER.7.6	In Compliance	
	ER.7.7	In Compliance	
ER.7.8	In Compliance		
Terms and Conditions	ER.9.1	In Compliance	
	ER.9.2.1	In Compliance	
	ER.9.2.2	In Compliance	
	ER.9.2.3	Risk of Noncompliance	In five farms
	ER.9.3.1	In Compliance	
	ER.9.3.2	In Compliance	
	ER.9.3.3	In Compliance	
	ER.10	Not Applicable	
	ER.11	Risk of Noncompliance	In nine farms
	ER.12.1	Risk of Noncompliance	In eight Farms
	ER.12.1.1	Risk of Noncompliance	In eight farms
	ER.12.2	Not Applicable	
	ER.13.1	Noncompliance	In five farms
	ER.13.2 (PR)	In progress	
ER.13.3 (PR)	In progress		
Administration	ER.15.1	Not Applicable	
	ER.15.2	Not Applicable	
	ER.15.2.1	Not Applicable	
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
	ER.17.2 (PR)	Not Applicable	
	ER.17.3 (PR)	Not Applicable	
	ER.17.4 (PR)	Not Applicable	
Worker Involvement	ER.18.1	In Compliance	
	ER.18.2 (PR)	In compliance	
Right to Organize and Bargain	ER.19	In Compliance	
Work Rules and Discipline	ER.20.1	Not Applicable	
	ER.20.2	Not Applicable	
	ER.20.3 (PR)	Not initiated	
	ER.20.4	Not Applicable	
	ER.20.6	Not Applicable	
	ER.20.7	Not Applicable	
	ER.20.8	Not Applicable	
	ER.20.9 (PR)	Not initiated	
ER.20.11	Not Applicable		

Access to Training for Family Members	ER.21	Noncompliance	In two farms
HSE Management System	ER.24.1.	Noncompliance	In 12 farms
	ER.24.2 (PR)	Not initiated	
	ER.24.3	Risk of Noncompliance	In 46 farms
	ER.24.4.1 (PR)	Not initiated	
	ER.24.4.2 (PR)	Not initiated	
	ER.24.4.3 (PR)	Not initiated	
	ER.24.4.4 (PR)	Not initiated	
	ER.24.4.5 (PR)	Not initiated	
	ER.24.4.6 (PR)	Not initiated	
Grievance Procedures	ER.24.5 (PR)	Not initiated	
	ER.25.1 (PR)	In progress	
	ER.25.2 (PR)	In progress	
	ER.25.3	In Compliance	
	ER.25.4	In Compliance	

Employment Relationship Assessment Summary

Notable Good Practices (if any)

Recruitment and Hiring	
Benchmarks	Compliance Status
<p>ER.3.1: Employers shall verify proof of age documentation for all young workers on the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify the date of birth of all workers, including long-term and casual workers.</p> <p>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</p> <p>ER.3.1.2: In cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers or through other means considered reliable in the local context.</p>	Noncompliance in all farms
<p>Findings/Noncompliance Explanation</p> <p>None of the farmers reported verifying workers' age documentation prior to the engagement. The recruitment process is informal. The farmers mostly use a 'jangle' system, where farmers' groups jointly provide labor to their members and sometimes engage seasonal workers.</p> <p>None of the farmers kept workers' records on age verification, even those who reported engaging permanent workers.</p> <p>None of the farmers reported maintaining medical or religious documents for age verification.</p> <p>Source: Farmer and worker interview</p>	
Company Action Plan	
<p>Activity</p> <p>All farmers receive yearly training on GAP, GEP, and GSP topics (with emphasis on equal pay and fair wages, no discrimination, no child labor, and no forced labor). Farmers in our database or supply chain employ temporary workers who are mostly colleagues within the same farming community. Ofi only conducts continuous training, ensuring that underage workers are not engaged.</p>	
<p>Output indicators (targeted results)</p>	<p>Training attendance and Summaries + pictures of training carried out to farmers</p>

Timeline and Deadline Date	Oct '23 - May '24
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Terms and Conditions

Benchmarks	Compliance Status
ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below: ER.9.2.3: the FLA Workplace Code.	Risk of Noncompliance in 5 farms
ER.11: Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant, or disabled workers, are implemented.	In 9 farms
ER.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.	In 8 farms
ER.12.1.1: Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.	In 8 farms
ER.13.1: Farmer, sharecropper or any kind of supervisor who is leading workers shall know the local labor laws and the FLA Code.	Noncompliance in 5 farms

Findings/Noncompliance Explanation	<p>Five farmers (4%) were unaware of the requirements of the company's code of conduct.</p> <p>Nine farms were not aware of the minimum age for employment, posing a risk to juvenile workers.</p> <p>One hundred fourteen farmers received labor standards training, with the latest training conducted in November 2023. However, five farms reported not having participated in any training, and some are unaware of the company's code of conduct and labor standards. So, they are not aware of the harassment or abuse requirement.</p> <p>Source: Farmer interview</p>
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Company Action Plan

Activity	All farmers have signed an agreement with details in their predominant languages during training, and this spreads across to all other subcontractors (Brokers and LBAs). Likewise, ofi Agri- supplier code highlights all codes of conduct required for compliance by all farmers, brokers, and LBAs. LBAs and Brokers sign individually while the Management Committee (a 5-member committee) signs on behalf of the farmers, and details of the code are cascaded to the farmers in each community. The ofi team will train all farmers further, emphasizing every detail of the code.
Output indicators (targeted results)	Training attendance and Summaries + pictures of training carried out to farmers+ signed Agri supplier code by management committee members
Timeline and Deadline Date	Apr 23 – Aug 24
Input (budget/resources)	NA

Responsible staff (title/department)	Field Coordinators and Trainers
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Access to Training for Family Members	
Benchmarks	Compliance Status
ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness-raising activities conducted for the workers and growers on the farms.	Noncompliance in two farms
Findings/Noncompliance Explanation	Two farmers had not been invited to training sessions, and none of the farmers reported that their family members got involved in them. Source: Farmer Interview
Company Action Plan	
Activity	Only farmers in our databases are trained. During training sessions, farmer's family members are allowed to participate. Training is cascaded to farmers across their cluster (between 15 and 25 farmers) within communities. ofi will encourage farmers to attend training with family members to further drive all relevant information as a means of raising awareness. Training attendance will be designed in a way to capture farmers' families attending training.
Output indicators (targeted results)	Training Attendances of training to capture other attendees.
Timeline and Deadline Date	Oct '23 - May '24
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

HSE Management System	
Benchmarks	Compliance Status
ER.24.1: Health, safety, and environmental rules shall be communicated to all workers in the local language or the language spoken by workers if it is different from the local language.	Noncompliance in 12 farms
ER.24.3: Employers shall designate a responsible person for HSE issues on the farm. For small farms, this could be the farmer's direct responsibility.	Risk of Noncompliance in 46 Farms
Findings/Noncompliance Explanation	Farmers are provided with health and safety training. However, farmers reported not having been trained, while the interviewed worker reported receiving such training. Forty-six (38%) farms were not aware of their first aid manager and could not easily access first aid services. Source: Farmer Interview
Company Action Plan	
Activity	OHS training is cascaded for all farmers yearly. Each cluster has a first aid box with enclosure supplies, and the lead farmer is the first aid manager at the cluster level. The first aid representatives of each farmer group monitor the first aid box, train the lead farmers, and ensure/maintain a first aid monitoring log monthly.

Output indicators (targeted results)	Template of the first aid monitoring log + training attendance and summaries + pictures of training carried out to farmers and the presence of equipped first aid box placed in front of the lead farmer's house
Timeline and Deadline Date	Oct '23 - May '24
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Nondiscrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Noncompliance	In nine farms
Recruitment and Employment Practices	ND.2.1	In Compliance	
	ND.2.3	Risk of Noncompliance	In all farms
Compensation Discrimination	ND. 3	In Compliance	
Discrimination in Training and Communication	ND. 4	In Compliance	
Marital or Pregnancy-Related Discrimination	ND.5.1	Risk of Noncompliance	In all farms
	ND.5.2	In Compliance	
	ND.5.3	In Compliance	
	ND.6.1	Not Applicable	
	ND.6.1.1	Not Applicable	
Health-Related Discrimination	ND. 7	In Compliance	
	ND.8	Not Applicable	
	ND. 9	Not Applicable	
Respect for Culture and Religion	ND.11	In Compliance	

Nondiscrimination Assessment Summary

General Compliance	
Benchmarks	Compliance Status
ND.1: Employers shall comply with all national laws, regulations and procedures concerning nondiscrimination.	Noncompliance in 9 farms
Findings/Noncompliance Explanation	Nine farms were not aware of the requirements of the Company's code of conduct. Further, they had not been trained on labor standards, so they were not aware of the nondiscrimination requirement. Source: Farmer Interview
Company Action Plan	
Activity	Training is cascaded yearly on the Ofi Agri Supplier Code, which identifies the company's code of conduct in detail. Farmers also signed an agreement identifying the code of conduct for farmers, labor standards, discrimination, etc. ofi will also ensure continuous refresher training on the ofi Agri supplier code across all clusters to capture farmers who are not fully aware of the details.

Output indicators (targeted results)	Training attendance of training + picture proofs.
Timeline and Deadline Date	Oct 23 – Sept 25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
ND.2.3: Employers must protect workers who allege any type of discrimination in recruitment and employment practices unless otherwise required by law.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	The engagement of farm workers is mainly informal based on prior agreements with the employer. In this context, no formal protection system is available to guarantee non-retaliation Source: Farmer interview
Company Action Plan	
Activity	The ofi Agri-supplier code covers the no-discrimination clause and a grievance mechanism is in place and clearly communicated to the farmers. A grievance committee exists to address all types of issues using the remediation process identified in the IMS manual. Complaints are submitted using the complaint forms with lead farmers, the Complaints box, anonymous text messages or calls through email, and contact posted in strategic locations in the community. Farmers and their workers were trained on grievance redress mechanisms in their various clusters.
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers
Timeline and Deadline Date	Apr 23 - Aug 24
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Marital or Pregnancy-Related Discrimination	
Benchmarks	Compliance Status
ND.5.1: Employers shall not require pregnancy testing of female workers, except as required by legal health and safety provisions. In cases that it is required by law, employers shall not use (the results of) such tests as a condition of hiring or continued employment.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	There is no documented policy for hiring and employing pregnant or nursing women at the farms.

	Source: Farmer Interview
Company Action Plan	
Activity	<p>Farmers manage their farms and labor; ofi, however, communicates the no child labor, no forced labor, no discrimination, fair wages, and freedom of association training to these farmers. Through training, farmers are well informed not to engage pregnant/nursing women as workers.</p> <p>A requirement in the RA standard prohibits farmers from engaging pregnant and nursing women in field activities because of the arduous nature of the work and the danger it may cause to their health.</p> <p>Farmers predominantly engage farmers in the same communities for activities on farms on a short-time basis.</p>
Output indicators (targeted results)	Training attendance and Summaries + pictures of training carried out to farmers
Timeline and Deadline Date	Oct '23 - May '25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Harassment or Abuse

Compliance Status

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

Harassment or Abuse Assessment Summary

General Compliance

Benchmarks		Compliance Status
H/A.1.1: Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment or abuse. H/A.1.2: Workers at the farm shall not be subject to any corporal punishment, sexual harassment, oppression, coercion, or any other kind of mental or physical abuse or intimidation, regardless of whether they are family members without a formal contract or hired staff.		Risk of Noncompliance in 5 farms
Findings/Noncompliance Explanation	Five farms were not informed of the company's code of conduct. Source: Farmer Interview	
Company Action Plan		
Activity	This could be because farmers were absent during the training. Farmers were trained on the Ofi Agri supplier code, which contains all codes of conduct, including nondiscrimination, harassment, and/or abuse. Continuous refresher training will be done at least once yearly.	
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ copies of flyers distributed	
Timeline and Deadline Date	Apr 23 - Aug 24	
Input (budget/resources)	NA	
Responsible staff (title/department)	Field Coordinators and Trainers	

Possible timeline:	Apr 23 - Aug 26
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Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Risk of Noncompliance	In twenty-one farms
Minimum Age	CL.2	Risk of Noncompliance	In three farms
Light Work	CL.3	Noncompliance	In three farms
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	Risk of Noncompliance	In twenty-one farms
	CL.6.1	Noncompliance	In all farms
	CL.6.2	Noncompliance	In all farms
	CL.7	Risk of Noncompliance	In four farms
Apprenticeships and Vocational Training	CL.8.1 (PR)	Not Applicable	
	CL.8.2 (PR)	Not Applicable	
Children on Premises	CL.9	In Compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	In Compliance	
	CL.10.2 (PR)	In compliance	

General Compliance	
Benchmarks	Compliance Status
CI.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.	Risk of Noncompliance in 21 Farms
Findings/Noncompliance Explanation	<p>Even if the assessors did not record any evidence of a violation of the child labor laws, regulations, and procedures at the assessed farms, 21 farms were unaware of what constitutes child labor. At the same time, some were not aware of (listed ages below) the minimum age for work, the minimum age for employment, and the minimum age for education.</p> <p>Source: Farmer Interview</p>
Company Action Plan	
Activity	<p>It is a standing order to train, monitor and remediate child labour with ofi supply chain; we have a robust system in place that ensures this is carried out. Our ofi trainers continuously train farmers on child labor and carry out household profiling and unannounced farm visits to assess child labor status. Where issues are found, they are remediated and follow-up actions are carried out.</p> <p>Trainers continuously train farmers on child labor, carry out household profiling and unannounced farm visits to assess child labor status.</p>
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ evidence (pictures) of verification and remediated cases
Timeline and Deadline Date	Oct '23 - May '25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Minimum Age	
Benchmarks	Compliance Status
CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. Suppose a country has a specified minimum age of 14 due to an insufficiently developed economy and educational facilities. In that case, employers might follow national legislation but must work to raise the minimum age to 15 progressively.	Risk of Noncompliance in 3 farms
Findings/Noncompliance Explanation	<p>No children were observed at the farm during the assessment. However, three farms reported that they need children to help work on the farm or to earn income by taking time off from school or not attending school.</p> <p>Source: Farmer Interview</p>
Company Action Plan	
Activity	<p>Where this indicator is triggered, ofi carries out sensitization of the farming household and provides support such as school kits and labor-saving equipment. Ofi goes as far as visiting the schools to ensure the farmer's children are attending classes.</p> <p>Trainers have trained farmers on child labor-related topics and also carry out regular sensitization where necessary.</p>
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ evidence (pictures) of verification and remediated cases
Timeline and Deadline Date	Oct '23 - May '24

Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Immediate Family Members

Benchmarks	Compliance Status
<p>CL.3: In accordance with national laws and ILO Convention 138, children of producers not younger than 12 years may be involved in light work on their parents' farm provided that:</p> <p>The work is not dangerous and not harmful to their health or development, and specifically</p> <ul style="list-style-type: none"> • should not involve the use of or exposure to chemicals, • should not involve carrying heavy loads (children should not lift loads more than 15% of their body weight at any time), • should not involve the use of farm equipment, dangerous tools, plows, tractors, machetes, sharp tools, saws, or power engines, • should not involve working on heights (not more than 6 feet) such as in trees or on ladders, or in confined places such as silos or storage areas, and • should not involve strenuous work and extreme conditions such as standing or bending for several hours, working in high temperatures, and not having breaks. <p>The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays. Specifically:</p> <ul style="list-style-type: none"> • working hours should not exceed 14 hours per week, • no work should take place before 6:00 am and after 8:00 pm, and • there should be at least one full day (24 hours) of rest per week. <p>The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral, or physical development.</p> <p>The child's parents provide supervision and guidance and maintain all documents as required by the law.</p> <p>Other criteria specific to in-scope commodities or as defined by the national government in the country that are not lower than the ILO standard on light work.</p>	<p>Noncompliance in 3 farms</p>

Findings/Noncompliance Explanation	<p>The national regulations allow children under working age to perform only light work under the supervision of their parents. They shall not work for excessive hours, and the farm work shall not jeopardize their education. However, three farms reported that they needed children to help with farm tasks, taking time off from school or not attending school. One child (11 years old) reported working for eight hours during weekends for an income of 2500 naira.</p> <p>Source: Farmer Interview</p>
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Company Action Plan

Activity	<p>Child labor cases, despite all efforts, can still be spotted among some farming households, where found, ofi kick starts the remediation process and follows up. Child Labour is monitored through the ofi OFIS App operated by ofi field staff, in which farmers' details on households are recorded and available. It also can record child labor cases for a record, where it is verified by field coordinators and after that remediated.</p> <p>ofi also has a Human Rights officer who checks, monitors, and collates details of cases reported, ensuring they are remediated and followed up to confirm remediation.</p> <p>Trainers have trained farmers on child labor-related topics and also carry out regular sensitization where necessary.</p>
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Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ evidence (pictures) of verification and remediated cases
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Timeline and Deadline Date	Oct '23 - May '24
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Input (budget/resources)	NA
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Responsible staff (title/department)	Field Coordinators and Trainers
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Young Workers	
Benchmarks	Compliance Status
CL.6.1: Employers shall comply with all relevant laws that apply to young workers (e.g., those between the minimum legal working age and 18), including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.	Noncompliance in all farms
CL.5: Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment of young workers. CL.7: No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Such work includes, but is not limited to, the application of agricultural chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights. An adult must supervise every activity performed by a young worker.	Risk of Noncompliance in 21 Farms In 4 farms
Findings/Noncompliance Explanation	<p>The minimum age for hazardous work is eighteen years. Employees who are under 18 are not allowed to work for four consecutive hours or more than 8 hours a day. Young persons are also not allowed to work at night except under circumstances specified by the law. Night time means a period of twelve consecutive hours, including the interval between 22:00 and 06:00 for persons under sixteen years of age, and a consecutive seven-hour period, including the interval between 22:00 and 07:00 for persons between sixteen and eighteen years of age. Young workers cannot be required to work overtime during public holidays. However, during the farmers' interview, the assessors noticed that some farmers were unaware of the requirements regulating the employment of young workers.</p> <p>No records of young workers are kept.</p> <p>The assessors recorded some farmers did not make any distinction between young workers and adult workers.</p> <p>Source: Farmer Interview</p>
Company Action Plan	
Activity	<p>ofi ensures all farmers are trained on NO CHILD LABOUR and all the pointers to CL. However, some farmers will still fall short of the training received, hence, when spotted, a remediation process is immediately initiated to correct and prevent further cases.</p> <p>Trainers have trained farmers on child labor-related topics and also carry out regular sensitization where necessary.</p>
Output indicators (targeted results)	Training attendance and Summaries + pictures of training carried out to farmers+ evidence (pictures) of verification and remediated cases and follow-up
Timeline and Deadline Date	Jan '23 - date
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
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General Compliance	HSE.1.	Risk of Noncompliance	In 19 farms
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In progress	
	HSE.3.1	Not Applicable	
	HSE.4 (PR)	Not Applicable	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	Not Applicable	
	HSE.5.2	Not Applicable	
Safety Equipment and First Aid	HSE.6.1 (PR)	In compliance	
	HSE.6.2 (PR)	Not initiated	
	HSE.16.3 (PR)	In compliance	
Personal Protective Equipment	HSE.7 (PR)	In progress	
	HSE.8	Noncompliance	In 57 farms
Chemical Management	HSE.9.1	Noncompliance	In 5 farms
	HSE.9.2	Noncompliance	In 7 farms
	HSE.9.2.1	Noncompliance	In all farms
	HSE.10	In Compliance	
	HSE.11.1	Noncompliance	In all farms
	HSE.11.2	Noncompliance	in all farms
Protection Reproductive Health	HSE.12.1	In Compliance	
	HSE.12.2 (PR)	In compliance	
Infrastructure	HSE.13 (PR)	Not Applicable	
	HSE.17.1	In Compliance	
	HSE.17.2 (PR)	In compliance	
	HSE.19 (PR)	In compliance	
	HSE.21 (PR)	In compliance	
	HSE.22 (PR)	Not Applicable	
Machinery Safety	HSE.14.1	Not Applicable	
	HSE.14.2	Not Applicable	
	HSE.14.3	Not Applicable	
	HSE.14.4	Not Applicable	
Ergonomics and Medical Facilities	HSE.15.2 (PR)	Not initiated	
	HSE.16.2	In Compliance	

Health Safety and Environment Assessment Summary

General Compliance	
Benchmarks	Compliance Status
HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.	Risk of Noncompliance in 19 Farms
Findings/Noncompliance Explanation	<p>Fourteen (12%) of the assessed farms had not been trained in health and safety. Further, five farms were not aware of the company's code of conduct.</p> <p>Source: Farmer Interview</p>
Company Action Plan	
Activity	<p>Trainers have cascaded OHS training to farmers in their clusters/communities. The lead farmers and environmental officers who are also farmers are charged with retraining any farmer who missed the main training section. Yearly ofi ensures the training is carried out across all communities.</p> <p>Training on OHS and ofi Agri supplier code was cascaded to farmers and their workers.</p>
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ copy of the distributed flyer on ofi code of conduct in the community
Timeline and Deadline Date	Apr '23 - May '25

Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Personal Protective Equipment	
Benchmarks	Compliance Status
HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.	Noncompliance in 57 farms
Findings/Noncompliance Explanation	Only twenty-five (21%) farms had been trained on training on PPE usage in the last training sessions in 2023. However, the majority of the farms and all the workers were not trained on the use of PPE. Source: Farmer Interview
Company Action Plan	
Activity	OHS training includes the use of PPEs, especially for carrying out hazardous tasks. These have been cascaded to farmers; however, there are exceptional cases where farmers were absent. In this case, the lead farmer and environmental officers stepped in to train. Training on OHS, especially on the usage of PPEs, was cascaded to farmers and their workers.
Output indicators (targeted results)	Training attendance and summaries + pictures of trainings carried out to farmers+ availability of PPEs provided for the environmental officer(s) in the community
Timeline and Deadline Date	Oct '23 - May '25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Chemical Management	
Benchmarks	Compliance Status
HSE.9.1: Chemicals and hazardous substances in use must be allowed by local law or by international standards.	Noncompliance In 5 farms
HSE.9.2: All chemicals and hazardous substances shall be appropriately labeled and stored in secure and ventilated areas and disposed of safely and legally in accordance with applicable laws. Where relevant, Material Safety Data Sheets (MSDS) must be available as well.	In 7 farms
HSE.9.2.1: Labels shall be placed in the local language and the language spoken by workers, if different from the local language. Where workers are illiterate, the labels and instructions for their handling should be depicted by pictograms. HSE.11.1: To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriate accommodations shall be made for pregnant women and workers under the age of 18, as required by applicable laws or the provisions of the FLA Workplace Code, in a manner that does not unreasonably disadvantage workers. HSE.11.2: If not provided by law, employers must protect workers who allege violations of accommodations to prevent unsafe exposure to hazardous chemicals and substances for pregnant women and workers under age 18.	In All farms
Findings/Noncompliance Explanation	Five farms (4%) were unaware of the banned agrochemicals. The other farmers reported being informed by Olam through training. Seven farms stored chemicals in inappropriate locations: bedrooms, sitting rooms, and the roof of the main house. Other farmers reported having chemicals in only stores or specific rooms set aside for chemical storage. Workers are not informed of the hazardous chemicals.

	<p>None of the interviewed farmers took precautions to prevent the exposure of pregnant and young workers.</p> <p>Source: Farmer Interview</p>
Company Action Plan	
Activity	<p>Ofi has cascaded training to farmers on the proper use and handling of chemicals. It has also selected an environmental officer alongside the lead farmer who helps to ensure that chemicals are stored away for human safety. Ofi encourages farming communities to build chemical storehouses away from the living areas for storage of pesticides, whether used or unused. However, very few communities have been able to achieve this. Training is ongoing and consistent.</p> <p>Approved and banned chemical posters have been designed and pasted in communities.</p> <p>Training on OHS regarding the proper use and handling of chemicals was cascaded. Farmers are being trained and retrained on the need to have functional chemical stores in their various communities.</p>
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ posters of approved and banned chemicals pasted in the community
Timeline and Deadline Date	Oct '23 - May '25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	In five farms
	HOW.1.2	In Compliance	
	HOW.1.3	In Compliance	
	HOW.1.4	Not Applicable	
Rest Day	HOW.2	Risk of Noncompliance	In six farms
Meal and Rest Breaks	HOW.3	In Compliance	
Protected Workers	HOW.4.1	Risk of Noncompliance	in all farms
	HOW.4.2 (PR)	Not initiated	
	HOW.4.3	Risk of Noncompliance	in all farms
Overtime	HOW.5.1	In Compliance	
	HOW.5.2 (PR)	Not Applicable	
	HOW.6.1	Risk of Noncompliance	In six farms
	HOW.6.2	Risk of Noncompliance	In all farms
	HOW.6.3 (PR)	Not Applicable	
Public Holidays and Leave	HOW.7	In Compliance	
	HOW.8.1	In Compliance	
	HOW.8.2	Not Applicable	
	HOW.8.3	Not Applicable	
	HOW.9	Not Applicable	
	HOW.10.1	In compliance	
	HOW.11 (PR)	Not Applicable	
	HOW.12.1 (PR)	Not Applicable	
HOW.12.2 (PR)	In Compliance		
	HOW.13	In Compliance	

	HOW.14	In compliance	
	HOW.15 (PR)	In compliance	
	HOW.16 (PR)	Noncompliance	In five farms

Hours of Work Assessment Summary

General Compliance	
Benchmarks	Compliance Status
HOW.1.1: Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.	Noncompliance in 5 farms
Findings/Noncompliance Explanation	Five farms were uninformed of the company's code of conduct. Source: Farmer Interview
Company Action Plan	
Activity	All farmers have been trained on workers' rights. Trainers have explained the fundamentals of ofi code of conduct which include; adherence to hours of work per day, per week and a rest day. There are exceptions where farmers were absent; in this case, a lead farmer will cascade training to them. Farmers were trained on the Ofi Agri supplier code, which contains all codes of conduct, including non-discrimination.
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ copies of flyers distributed
Timeline and Deadline Date	Apr 23 - Aug 25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Rest Day	
Benchmarks	Compliance Status
HOW.2: Pursuant to any permanent or temporary contract, workers shall be entitled to at least 24 consecutive hours of rest every seven days. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following. For short-term seasonal work during peak activities (2-3 weeks), workers have the option to work more than seven days without a day off if they voluntarily agree with it, unless local law prohibits it. When the peak activity period exceeds three weeks, and the employer has control over the workers' schedule, the rest day provision must apply.	Risk of Noncompliance in 6 farms
Findings/Noncompliance Explanation	Six farmers reported that they worked seven consecutive days during the harvesting period. Source: Farmer Interview
Company Action Plan	
Activity	Trainers have explained the fundamentals of ofi code of conduct, which include adherence to hours of work per day, per week and a consecutive day of rest every seven days. In exceptional cases (harvesting period), farmers and workers can work seven consecutive days, provided their rest day will still be observed in subsequent weeks. Farmers were trained on the Ofi Agri supplier code, which contains all codes of conduct, including working hours and overtime.

Output indicators (targeted results)	Training attendance and summaries, pictures of training carried out to farmers, and copies of flyers distributed.
Timeline and Deadline Date	Oct 23 – Sep 24
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Protected Workers (pregnant or nursing women, young workers)

Protected Workers (pregnant or nursing women, young workers)		Compliance Status
Benchmarks	HOW.4.1: The workplace shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers. HOW.4.3: If not provided by law, employers must protect workers who allege violations of laws governing work hours limiting the nature, frequency, and volume of work performed by pregnant or nursing women or young workers.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	Even if the assessors did not observe any nursing/pregnant women or young workers, no differentiated work schedule for them was observed during the farm visits. Source: Farmer Interview	

Company Action Plan

Activity	Farmers have been trained on NO discrimination, NO bias, equal pay for equal work done regardless of gender, and nursing/pregnant women who don't engage in any kind of work. Farmers only engage fellow farmers for work on farms in short time tasks. Farmers are trained on Human Rights policies, and details on labor requirements are emphasized during training.
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers
Timeline and Deadline Date	Oct '23 - May '25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Overtime

Overtime		Compliance Status
Benchmarks	HOW.6.1: Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed. HOW.6.2: All overtime work shall be voluntary.	Risk of Noncompliance In 6 farms In all farms
Findings/Noncompliance Explanation	114 (94%) farmers reported receiving training on labor standards, and some of the topics covered were hours of work and fair labor treatment, among others.	

	<p>The farmers are therefore informed of law requirements on hours of work. However, six farms were reported to have never been trained.</p> <p>Only two farms reported working 56 hours a week (seven days). Furthermore, the worker interviewed was unaware of what constitutes overtime work because there is no tracking system for working hours on all farms.</p> <p>Source: Farmer Interview</p>
Company Action Plan	
Activity	<p>ofi trainers have conducted training on labor standards, i.e., hours of work per worker in a day, per week with a compulsory 24hrs consecutive rest day every seven days, and it was emphasized that overtime work is voluntary. However, in cases of absenteeism during training, the lead farmer will relay the training to such farmers.</p> <p>Farmers were trained on the Ofi Agri supplier code, which contains all codes of conduct, including working hours and overtime, including regular sensitization on working hours and overtime.</p>
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers
Timeline and Deadline Date	Apr 23 - Aug 25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Risk of Noncompliance	In nine farms
	C.1.2	In Compliance	
	C.1.3	In Compliance	
	C.1.4	In progress	
Minimum Wage/Fair Compensation	C.2.1	In Compliance	
	C.2.2	In Compliance	
	C.2.3	In Compliance	
	C.2.4 (PR)	Not initiated	
	C.2.5 (PR)	Not initiated	
	C.2.6 (PR)	Not initiated	
	C.3	Not Applicable	
Farmer/Producer Income	C.4 (PR)	In progress	
Wage Payment and Calculation	C.6	In Compliance	
	C.7.1	In Compliance	
	C.7.2	In Compliance	
	C.7.3 (PR)	Not Applicable	
	C.7.4 (PR)	Not Applicable	
	C.7.5	In Compliance	
	C.8.1	Not Applicable	
	C.8.2	Not Applicable	
	C.8.3	Not Applicable	
	C.8.4 (PR)	Not Applicable	
	C.9 (PR)	Not Applicable	

	C.10.1	In Compliance
	C.10.1.1	In Compliance
	C.10.2	Not Applicable
	C.10.3	Not Applicable
Workers Awareness	C.11.1.1	Not Applicable
	C.11.1.2	Not Applicable
	C.11.1.3	Not Applicable
	C.11.1.4	Not Applicable
	C.11.1.5	Not Applicable
	C.13 (PR)	In progress
Fringe Benefits	C.12.1	In Compliance
	C.12.2 (PR)	In compliance
	C.12.3	In Compliance
	C.12.4	In Compliance
	C.12.5	In Compliance

Compensation Assessment Summary

General Compliance	
Benchmarks	Compliance Status
C.1.1: Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations and procedures concerning the payment of compensation to workers.	Risk of Noncompliance in 9 farms
Findings/Noncompliance Explanation	The assessors recorded nine farms that were unaware of the Company's code of conduct and had not attended labor standards training. Source: Farmer Interview
Company Action Plan	
Activity	Trainers have cascaded training on ofi code of conduct which included compliance with all national laws. There are exceptions where farmers are absent; in such cases, the lead farmer will continue the training to members of the community. Farmers were trained on the Ofi Agri supplier code, which contains all codes of conduct, including labor standards.
Output indicators (targeted results)	Training attendance and summaries + pictures of training carried out to farmers+ copies of flyers distributed
Timeline and Deadline Date	Apr 23 - Aug 25
Input (budget/resources)	NA
Responsible staff (title/department)	Field Coordinators and Trainers

Overview - Farms vs. Non-compliances

Total number of Farms: 121

	Employment Relationship	Nondiscrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective	Health, Safety and Environment	Hours of Work	Compensation	Total
% of farms with one or more non-compliances or risk of non-compliance	100%	100%	4%	0%	100%	0%	100%	100%	7%	
Total number of benchmarks (excl. progressive benchmarks)	48	14	19	19	9	25	16	19	27	196
Farm 1	5	2	0	0	2	0	3	3	0	15
Farm 2	5	2	0	0	2	0	4	3	0	16
Farm 3	4	2	0	0	2	0	3	3	0	14
Farm 4	4	2	0	0	2	0	3	3	0	14
Farm 5	4	2	0	0	2	0	3	3	0	14
Farm 6	5	2	0	0	4	0	4	4	0	19
Farm 7	4	2	0	0	2	0	4	3	0	15
Farm 8	4	2	0	0	2	0	4	3	0	15
Farm 9	4	2	0	0	2	0	4	3	0	15
Farm 10	4	2	0	0	2	0	4	3	0	15
Farm 11	4	2	0	0	2	0	4	3	0	15
Farm 12	5	2	0	0	4	0	4	3	0	18
Farm 13	4	2	0	0	2	0	4	3	0	15
Farm 14	4	2	0	0	2	0	4	3	0	15
Farm 15	4	2	0	0	2	0	4	3	0	15
Farm 16	6	2	0	0	4	0	4	3	0	19
Farm 17	4	2	0	0	2	0	4	3	0	15
Farm 18	5	2	0	0	2	0	3	3	0	15
Farm 19	4	2	0	0	2	0	4	3	0	15
Farm 20	4	2	0	0	2	0	4	3	0	15
Farm 21	4	2	0	0	2	0	4	3	0	15
Farm 22	4	2	0	0	2	0	4	3	0	15
Farm 23	6	2	0	0	5	0	5	3	0	21

Farm 24	5	2	0	0	2	0	4	3	0	16
Farm 25	5	2	0	0	4	0	4	3	0	18
Farm 26	5	2	0	0	4	0	4	3	0	18
Farm 27	4	2	0	0	2	0	5	3	0	16
Farm 28	5	2	0	0	2	0	5	3	0	17
Farm 29	5	2	0	0	2	0	4	3	0	16
Farm 30	4	2	0	0	2	0	4	3	0	15
Farm 31	5	2	0	0	2	0	3	3	0	15
Farm 32	4	2	0	0	2	0	3	3	0	14
Farm 33	4	2	0	0	2	0	4	3	0	15
Farm 34	4	2	0	0	2	0	4	3	0	15
Farm 35	4	2	0	0	4	0	5	3	0	18
Farm 36	5	2	0	0	2	0	5	3	0	17
Farm 37	6	2	0	0	2	0	4	3	0	17
Farm 38	5	2	0	0	2	0	4	3	0	16
Farm 39	5	2	0	0	2	0	4	3	0	16
Farm 40	4	2	0	0	4	0	3	3	0	16
Farm 41	4	2	0	0	2	0	3	3	0	14
Farm 42	4	2	0	0	2	0	4	3	0	15
Farm 43	6	3	0	0	5	0	3	4	1	22
Farm 44	5	2	0	0	2	0	3	3	0	15
Farm 45	4	2	0	0	5	0	4	3	0	18
Farm 46	4	2	0	0	2	0	3	4	0	15
Farm 47	4	2	0	0	2	0	4	3	0	15
Farm 48	4	2	0	0	2	0	4	3	0	15
Farm 49	4	2	0	0	2	0	4	3	0	15
Farm 50	4	2	0	0	2	0	4	3	0	15
Farm 51	5	2	0	0	4	0	4	3	0	18
Farm 52	4	2	0	0	2	0	4	3	0	15
Farm 53	4	2	0	0	2	0	4	3	0	15
Farm 54	4	2	0	0	2	0	3	3	0	14
Farm 55	4	2	0	0	2	0	4	3	0	15
Farm 56	5	2	0	0	4	0	4	3	0	18
Farm 57	4	2	0	0	2	0	4	3	0	15
Farm 58	5	2	0	0	4	0	4	3	0	18
Farm 59	4	2	0	0	2	0	4	3	0	15
Farm 60	4	2	0	0	2	0	4	3	0	15
Farm 61	4	2	0	0	2	0	4	3	0	15
Farm 62	6	2	0	0	4	0	4	3	0	19
Farm 63	4	2	0	0	2	0	4	3	0	15
Farm 64	5	2	0	0	2	0	3	3	0	15

Farm 65	5	2	0	0	2	0	3	4	0	16
Farm 66	5	2	0	0	2	0	3	3	0	15
Farm 67	5	2	0	0	2	0	3	3	0	15
Farm 68	4	2	0	0	2	0	3	3	0	14
Farm 69	5	2	0	0	2	0	3	3	0	15
Farm 70	5	2	0	0	2	0	3	3	0	15
Farm 71	5	2	0	0	2	0	3	3	0	15
Farm 72	5	2	0	0	2	0	3	3	0	15
Farm 73	5	2	0	0	2	0	3	3	0	15
Farm 74	5	2	0	0	2	0	3	3	0	15
Farm 75	5	2	0	0	2	0	3	3	0	15
Farm 76	4	2	0	0	2	0	3	3	0	14
Farm 77	4	2	0	0	2	0	3	3	0	14
Farm 78	4	2	0	0	2	0	3	3	0	14
Farm 79	4	2	0	0	2	0	3	3	0	14
Farm 80	4	2	0	0	2	0	3	3	0	14
Farm 81	4	2	0	0	2	0	3	3	0	14
Farm 82	6	2	0	0	4	0	4	3	0	19
Farm 83	4	2	0	0	2	0	3	3	0	14
Farm 84	8	3	1	0	2	0	5	4	1	24
Farm 85	5	2	0	0	4	0	3	3	0	17
Farm 86	4	2	0	0	2	0	3	3	0	14
Farm 87	5	2	0	0	2	0	3	3	0	15
Farm 88	7	3	0	0	2	0	3	4	1	20
Farm 89	5	2	0	0	2	0	4	3	0	16
Farm 90	5	2	0	0	2	0	4	4	0	17
Farm 91	4	2	0	0	2	0	3	3	0	14
Farm 92	5	2	0	0	2	0	3	3	0	15
Farm 93	4	2	0	0	2	0	3	3	0	14
Farm 94	4	2	0	0	2	0	3	3	0	14
Farm 95	4	2	0	0	2	0	3	3	0	14
Farm 96	5	2	0	0	5	0	3	3	0	18
Farm 97	5	2	0	0	2	0	3	3	0	15
Farm 98	4	2	0	0	2	0	3	3	0	14
Farm 99	4	2	0	0	2	0	3	3	0	14
Farm 100	6	3	1	0	2	0	4	4	1	21
Farm 101	5	2	0	0	2	0	3	3	0	15
Farm 102	5	2	0	0	2	0	3	3	0	15
Farm 103	4	2	0	0	2	0	3	3	0	14
Farm 104	4	2	0	0	2	0	3	3	0	14
Farm 105	4	2	0	0	4	0	3	3	0	16

Farm 106	4	2	0	0	2	0	3	3	0	14
Farm 107	4	2	0	0	2	0	3	3	0	14
Farm 108	5	2	0	0	2	0	3	3	0	15
Farm 109	6	2	0	0	2	0	3	3	0	16
Farm 110	8	3	0	0	5	0	3	4	1	24
Farm 111	9	3	1	0	4	0	5	5	1	28
Farm 112	9	3	1	0	4	0	5	6	1	29
Farm 113	10	3	1	0	4	0	4	5	1	28
Farm 114	7	3	0	0	2	0	3	3	1	19
Farm 115	6	2	0	0	4	0	4	3	0	19
Farm 116	4	2	0	0	2	0	3	3	0	14
Farm 117	4	2	0	0	2	0	3	3	0	14
Farm 118	4	2	0	0	2	0	3	3	0	14
Farm 119	4	2	0	0	2	0	3	3	0	14
Farm 120	5	2	0	0	2	0	4	3	0	16
Farm 121	5	2	0	0	2	0	4	3	0	16
TOTAL	573	251	5	0	293	0	432	379	9	1942
Average % of compliance per code element	9.87	14.82	0.22	0.00	26.91	0.00	22.31	16.49	0.28	8.19