

RSPO Membership Rules

All members must comply with the requirements as described in this document.

Endorsed by the Board of Governors on 25 June 2020, in Kuala Lumpur, Malaysia

RSPO Membership Rules 2020

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1.0 Overview

- 1.1 The Roundtable on Sustainable Palm Oil (RSPO) is a global, multi-stakeholder initiative on sustainable palm oil. Members of RSPO, and participants in its activities come from many different backgrounds, including plantation companies, manufacturers and retailers of palm oil products, environmental NGOs and social NGOs and from many countries that produce or use palm oil. The principal objective of RSPO is “to promote the growth and use of sustainable palm oil through co-operation within the supply chain and open dialogue between its stakeholders”.
- 1.2 The purpose of this document is to set out the rules and requirements to become an RSPO member and provide guidance on the administration of RSPO membership.

2.0 Membership Categories and Sectors

- 2.1 An RSPO Member shall be as described in Article 4 of the **RSPO Statutes** and composed of the following category of members:

- Ordinary Members
- Affiliate Members
- Supply Chain Associates
- Honorary Members

- 2.2 **Ordinary Members** shall include:

- (i) Any organisations that have either direct involvement, or have activities around, the palm oil supply chain
- (ii) Banks and investors
- (iii) Non-Governmental Organisations ("NGO")

- 2.2.1 The Ordinary membership can be divided into seven sectors as below:

- (i) **Oil Palm Growers** – Entities that own and/or manage oil palm developments.
 - Grower – Grower of oil palm where the total land area managed for oil palm cultivation is more than 500 hectares.
 - Smallholder - Farmer growing oil palm where the total planted area of oil palm is below 50 hectares in size. Smallholders must form a group and assign a manager. For the purpose of admission to RSPO membership, where the manager is:
 - (i) An individual – the smallholder group must register itself as a legal entity before applying for membership.
 - (ii) An entity – the group manager as an entity shall apply for membership.
 - Small Grower - Grower of oil palm where the total land area managed for oil palm cultivation is more than 50 hectares but less than 500 hectares.
- (ii) **Palm Oil Processors and/or Traders** – Entities who are involved in the processing, producing, purchasing and/or selling of palm oil and/or oil palm products. This sector also includes distributors or wholesalers involved in the distribution of products for supply to end product manufacturers or resellers.
- (iii) **Consumer Goods Manufacturers** – Entities that use oil palm products in the manufacturing of goods designed and intended for consumption or end use without requiring further repackaging or processing.

- (iv) **Retailers** – Entities that buy products from a manufacturer or wholesaler, or produce own label products and selling the products directly to consumers or end users.
- (v) **Banks and Investors** – Licensed financial institutions that provide financial services which include commercial/retail banking and investment banking.
- (vi) **Environmental or Nature Conservation Organisations** – Any not-for-profit organisation that are independent from governmental organisations with objectives concerning environmental protection and improvement of the health of the environment.
- (vii) **Social or Development Organisations** – Any non-for-profit organisation that are independent from governmental organisations that focuses on areas that may include social justice, human and labour rights, poverty alleviation and social development.

2.2.2 Ordinary Members shall have voting rights at the General Assembly and are able to publicly state that they are members of RSPO.

2.3 Affiliate Members

2.3.1 Affiliate Members are any individuals or organisations that have indirect involvement or interest in the palm oil supply chain.

2.3.2 The Affiliate membership are be divided into:

- (i) Individuals
- (ii) Organisations
- (iii) Associations

2.3.3 Affiliate Members do not have voting rights at the RSPO General Assembly and they are allowed to publicly state they are Affiliate Members of RSPO.

2.4 Supply Chain Associate

2.4.1 Supply chain associates are any organisations that are active in the supply chain of RSPO certified palm oil and purchase less than 500 metric tons of oil palm products per year.

2.4.2 The Supply Chain Associate membership can be divided into:

- (i) **Organisations** – Entities that are involved in the palm oil supply chain with activities relating to any of the sectors as described under Ordinary Members in Clause 2.2.1 (ii) – (iv).
- (ii) **Supply Chain Group Manager** – Separate entities, as described in Clause 2.4.2 (i), that each uses up to 500 metric tons of oil palm products and formally agree to join a group under the direction of a group manager. The group manager as an entity shall apply for membership.

2.4.3 Supply Chain Associates do not have voting rights at the RSPO General Assembly and they are allowed to publicly state they are Supply Chain Associates of RSPO.

2.5 Honorary Members

2.5.1 An Honorary membership is awarded by the Board of Governors to an individual who has been recognised, to the Board of Governors sole and absolute satisfaction, of their exemplary and long standing contributions to the RSPO.

2.5.2 Honorary Members do not have voting rights at the RSPO General Assembly and they are allowed to publicly state they are Honorary Members of RSPO.

3.0 Application for Membership

3.1 Applicants for RSPO Membership must submit an application to the RSPO Secretariat using the prescribed online membership application form at <http://www.rspo.org/members/apply>.

3.2 The Chief Executive Officer of RSPO shall have the authority to approve the application.

3.3 Only legal entities are accepted for admission in the Ordinary membership category.

3.4 All applications shall be posted on RSPO website for 2 weeks for public comments.

3.5 Grower applicants are required to submit the following:

- (i) It is compulsory for all growers to disclose any non-compliant land clearing. In compliance with the **RSPO Remediation and Compensation Procedure** ("RaCP") as endorsed by BoG on 16 November 2015, related to Land Clearance without Prior High Conservation Value (HCV) Assessment, growers are required to disclose when applying for RSPO membership to the RSPO Secretariat any clearance for expansion after 2005 without prior HCV assessment on land under their control.

Section 3.1 of the RaCP provides that *"Growers applying for RSPO membership shall disclose to the RSPO Secretariat any clearance for expansion after 2005 without prior HCV assessment on land under their control, or else state in writing that no such clearance exists, prior to the two-week public comment period on membership applications. Applications for RSPO membership will be eligible for approval after the Land Use Change analysis has been approved by the RSPO."*

- (ii) Disclosure of time-bound plans to implement the RSPO Principles and Criteria.

- (iii) Estate location and concession maps in Shapefile format (including for subsidiary if any).

3.6 Both Ordinary Members and Affiliate Members shall be bound by the **Code of Conduct for Members of RSPO**, whereas Supply Chain Associates shall commit to adhere to the **Code of Conduct for Supply Chain Associates of RSPO**.

4.0 Membership Fee

4.1 RSPO Membership fees are as described in Article 5 of the **RSPO Statutes**.

4.2 RSPO Member's initial membership shall be for a period of two (2) years ("Membership Period"). The Membership Period will be specified via official notification from the RSPO Secretariat. Upon expiry of the Membership Period, the membership of each RSPO Member shall be automatically renewed (unless the membership is terminated in writing three months before the expiry of the Membership Period) subject to payment of the Membership Fee.

4.3 An Honorary Member will enjoy a non-transferrable lifetime membership tenure and there will be no fees attached to this membership.

4.4 The RSPO membership fee structure are as below:

Membership Category	Membership Sector	Annual Membership Fee (Euro)
Ordinary	(i) Oil Palm Growers <ul style="list-style-type: none"> ● Oil Palm Growers – Malaysia ● Oil Palm Growers – Indonesia ● Oil Palm Growers – Rest of the World ● Oil Palm Growers – Smallholder Group Manager <ul style="list-style-type: none"> - > 1999 hectares - 1000 – 1999 hectares - < 1,000 hectares ● Oil Palm Growers – Small Grower (less than 500 hectares) 	2,000
	(ii) Palm Oil Processors and/or Traders	2,000
	(iii) Consumer Goods Manufacturers	
	(iv) Retailers	
	(v) Banks and Investors	
	(vi) Environmental/Nature Conservation Organisations	
	(vii) Social/Development Organisations	
Affiliate	Individuals, Organisations, Associations	250
Supply Chain Associate	Supply Chain Associates, Supply Chain Group Managers	100
Honorary Member	Individuals	No fee for life.

5.0 Group Membership

5.1 On **7 November 2019**, the Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO) approved the expanded scope of the RSPO Group Membership from the original requirement endorsed on 11 November 2016. The expanded scope includes six (6) definitions of Group Membership.

5.2 Group Membership Type 1: Corporate Group

5.2.1 This is a compulsory requirement for registration of corporate group under one membership, hereinafter referred to as **Corporate Group Membership**.

5.2.2. For the purpose of Corporate Group Membership, the following definitions are used:

- (i) **Entity** means a body corporate or organisation which is incorporated or registered under the laws of the country in which the Entity is incorporated or registered.

- (ii) **Control** means:
- (a) having management control which includes the ability to direct, instruct or manage business activity or administration of an Entity whether by having the ability to influence the board, management of an Entity through shareholding, stock ownership or by contractual or operational arrangement;
 - (b) in accordance with whose directions, instructions or wishes an Entity is accustomed or is under an obligation, whether formal or informal, to act in relation to a Parent's direction, instructions or wishes.

Illustrations for Control:

- (a) Where the Parent has a controlling interest in another Entity.
- (b) Where there exists a contractual or operational agreement or arrangement, whether formal or informal, between Parent and another Entity.
- (c) Where an Entity or its directors are accustomed, or is under an obligation, whether formal or informal, to act in accordance with the directions, instructions or wishes of the Parent.

- (iii) **Group** means Parent and Related Entities.

Illustration of a Group:

- (a) Where the Parent has a controlling interest in one or more Entities.
- (b) Where the Parent has a controlling interest in one Entity and management control of another Entity by contractual or operational management, both Entities are Related Entities of the Parent.

- (iv) **Parent** means an Entity which has Control over other Entities within its Group.

- (v) **Related Entities** means Entities which are under the common Control of a Parent and shall include a Subsidiary, Associate or other Related Entities.

- (vi) **Subsidiary** means an Entity where the Parent:

- (a) holds (whether as a legal owner or as beneficiary) more than half of the issued share capital of that Entity (excluding any part thereof which consists of preference shares); or
- (b) controls more than half of the voting power of that Entity; or
- (c) controls the composition of the board of directors of that Entity.

- (v) **Associate** means an Entity in which a Parent holds (whether as a legal owner or as beneficiary) less than half of the issued share capital of that Entity or controls less than half the voting power of that Entity.

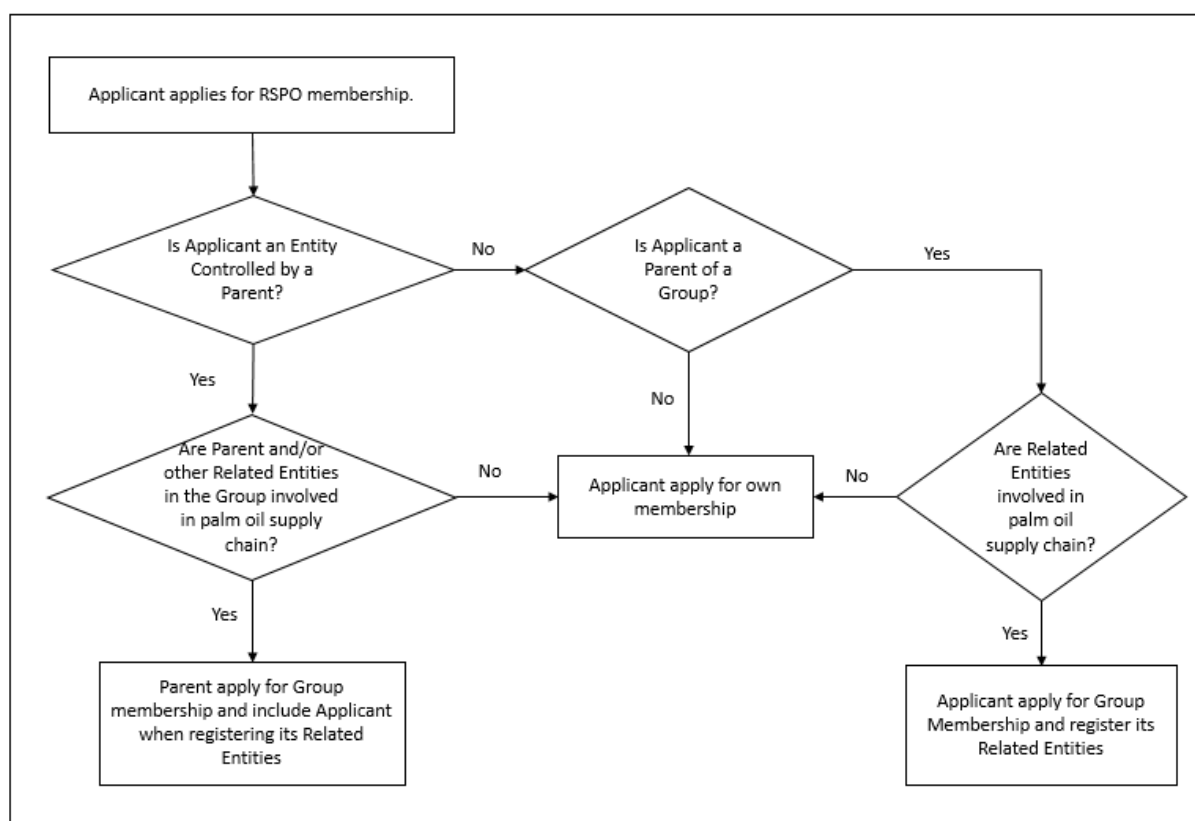
5.2.3 Where a member or a prospective member is part of a group of Entities, whether a Subsidiary, Associate or other Related Entity falling under the Control of a Parent Entity, only the Parent Entity may apply for membership with the RSPO whereby the Parent Entity shall represent all Entities within its Group provided always that the Parent and/or the Entities within its Group are involved in activities related to the palm oil supply chain.

5.2.4 Where only one Entity within a group of companies is involved in activities related to the palm oil supply chain, only that Entity shall register as a member.

5.2.5 In determining Control, the RSPO may consider whether the Parent has:

- (i) the ability to exert influence over the management and/or activity of an Entity through:
 - (a) ownership of a proportionately significant shareholding in relation to total voting shares of the Entity, whether through a majority or minority shareholding;
 - (b) representation on the board of directors of an Entity.
- (ii) the ability to control, direct and manage the activities of a non-related Entity.

5.2.6 The administration of Corporate Group Membership can be illustrated as follows.



- (i) Where a Parent who is an RSPO member and having one or more Related Entities in its Group who are separately holding RSPO membership, then the Parent shall declare to RSPO all its Related Entities, whether or not they are RSPO members, and register them under the Parent's membership. Thereafter the RSPO membership of the Related Entities shall effectively be cancelled. Should any of the Related Entities hold a membership earlier than that of the Parent's membership, then the Parent's effective membership date shall change to follow that of the earliest membership date of the Related Entity.
- (ii) Where a Parent is not an RSPO member but one or more of its Related Entities are holding RSPO membership then:
 - (a) if only one of its Related Entity is an RSPO member and the Parent is not involved in activities related to the palm oil supply chain, then Corporate Group Membership is not applicable to the Parent.

- (b) if only one of its Related Entity is an RSPO member and the Parent is involved in activities related to the palm oil supply chain, then the Parent shall apply for Group Membership and include the Related Entity under the Parent's membership.
- (c) if two or more Related Entities are RSPO members then the Parent shall apply for Group Membership and declare to RSPO all its Related Entities, whether or not they are RSPO members, and register them under the Parent's membership. Thereafter the RSPO membership of the Related Entities' shall effective be cancelled. Should any of the Related Entities hold a membership earlier than that of the Parent's membership, then the Parent's effective membership date shall follow that of the earliest membership date of the Related Entity.

5.3 Group Membership Type 2: Smallholder Group Manager (SHGM)

5.3.1 This is a compulsory requirement for registration of a smallholder group manager that manages more than one group(s) of smallholders, hereinafter referred to as **SHGM**.

5.3.2 For the purpose of SHGM, the following definitions are used:

- (i) **SHGM** follows the definition as determined in Clause 2.2.1(i) of Smallholder. It is a legal entity that manages group(s) of farmers that grow oil palms where each farmer's total planted area is below 50 hectares in size.
- (ii) **Group member** means a separate smallholder group organised within a geographical or regional area.

5.3.3 Each group member must have a unique identifier of group name. The group member must be listed as part of the SHGM.

5.3.4 The farmers listed under the SHGM must be provided during the application and updated if any changes are made.

5.4 Group Membership Type 3: Supply Chain Group Manager (SCGM)

5.4.1 This is a compulsory requirement for registration of a supply chain group manager that manages more than one group(s) of supply chain entity, hereinafter referred to as **SCGM**.

5.4.2 For the purpose of SCGM, the following definitions are used:

- (i) **SCGM** follows the definition as determined in Clause 2.4.2(ii) of Supply Chain Associates. It is a legal entity that manages separate entities where each entity uses up to 500 metric tonnes of oil palm products per annum.
- (ii) **Group member** means separate entities as determined in Clause 2.4.2(i) of Supply Chain Associates.

5.4.3 Each group member must be listed as part of the SCGM.

5.4.4 The entities listed under the SCGM must be provided during the application and updated if any changes are made.

5.5 **Group Membership Type 4: Group of Companies Operating under a common Brand, Trading or Business Name**

5.5.1 This is a voluntary requirement for registration of a group of entities that operates under a common Brand, Trading or Business Name, hereinafter referred to as **Common Brand Group Membership (CBGM)**.

5.5.2 For the purpose of CBGM, the following definitions are used:

- (i) **CBGM** means a collection of entities operating under the same brand, trading or business name either for marketing, administrative, management and other economic purposes; or with common economic, social and cultural needs, aspirations and objectives.
- (ii) **Group member** means separate entities without a corporate parent. If any of the group member(s) fall under the Clause 5.2 of Corporate Group Membership, it shall not be listed as part of the group member.

Illustration of a Group:

- (a) Where no corporate parent has a controlling interest in one or more Entities.
- (b) Where there is a public declaration of the group operating under the same brand, trading or business name, for example through website, public announcements, etc.

5.5.3 One entity shall be designated as the official RSPO membership holder as “designated parent”. All the owners of the companies under the same brand would have to agree and accept one of the companies to be the “Parent” entity by signing in the letter of agreement.

5.5.4. Each group member must be listed as part of the CBGM.

5.5.5 The entities listed under the CBGM must be provided during the application and updated if any changes are made.

5.6 **Group Membership Type 5: Group of Cooperatives (2 or 3 tier cooperatives) or Cooperative Unions**

5.6.1 This is a voluntary requirement for registration of cooperative whose members are other cooperative, hereinafter referred to as **Cooperative Union Group Membership (CUGM)**.

5.6.2 For the purpose of CUGM, the following definitions are used:

- (i) **CUGM** means a legal entity owned and democratically controlled by its cooperative members.
- (ii) **Group member** means cooperative operating as a member of the Cooperative Union. They are distinguished from other forms of incorporation in that profit-making or economic stability are balanced by the interests of the community.

5.6.3 The main cooperative entity shall be designated as the official RSPO membership holder as “designated parent”. All the group members (cooperatives) would have to agree and accept the main cooperative to be the “Parent” entity by signing in the letter of agreement.

5.6.4. Each group member must be listed as part of the CUGM.

5.6.5 The entities listed under the CUGM must be provided during the application and updated if any changes are made.

5.7 Group Membership Type 6: Group of Companies having common shareholdings owned by individual(s)

5.7.1 This is a voluntary requirement for registration of a group of entities that operates under a common shareholding owned by individuals, hereinafter referred to as **Common Owner Group Membership (COGM)**.

5.7.2 For the purpose of COGM, the following definitions are used:

- (i) **COGM** means a collection of entities having common shareholdings owned by individual(s) where the common shareholder (individual) holds more than half of the issued share capital of the respective group member (excluding any part thereof which consists of preference shares).
- (ii) **Group member** means separate entities without a corporate parent. If any of the group member(s) fall under the Clause 5.2 of Corporate Group Membership, it shall not be listed as part of the group member.

Illustration of a Group:

- (a) Where no corporate parent has a controlling interest in one or more Entities.
- (b) The same shareholder(s) must hold more than half of the issued share capital of the group member.

5.7.3 One entity shall be designated as the official RSPO membership holder as “designated parent”. All the related entities under the same shareholdings would have to agree and accept one of the companies to be the “Parent” entity by signing in the letter of agreement.

5.7.4. Each group member must be listed as part of the COGM.

5.7.5 The entities listed under the COGM must be provided during the application and updated if any changes are made.

5.8 The table below shows summary of Group Membership:

Type	Group Description	Definition	Administration	Inclusion as Group Members	Explanation
1	Corporate Group	A group of entities consist of a collection of parent and subsidiary companies that function as a single economic entity through a common source of control.	<ul style="list-style-type: none"> • Parent and subsidiary relationships are determined by the controlling interest directly or indirectly owned by the Parent in the subsidiaries. • The parent company holds the RSPO membership. • Compulsory. 	Subsidiary companies are registered as Group Members.	<p>This follows the corporate structure of companies and current group membership rules.</p> <p>When a parent company holds more than 50% of share capital, controls more than half the voting power of the entity and controls the compositions of the Board of Directors.</p>
2	Smallholder Group Manager (SHGM)	Legal entity that manages group(s) of smallholders	<ul style="list-style-type: none"> • The SHGM holds the RSPO membership • Compulsory. 	Each separate smallholder groups managed by the SHGM, e.g. smallholders group organised within a geographical or regional area, are listed as Group Members	<p>Each group under the SHGM must have a unique identifier of group name.</p> <p>Individual group names must be listed as part of the SHGM.</p> <p>The farmers listed under the group must be provided during applications and updated if any changes are made.</p>

3	Supply Chain Group Manager (SCGM)	<p>Legal entity that manages a group of entities that each purchase or use up to 500 MT of oil palm products</p>	<ul style="list-style-type: none"> • The SCGM holds the RSPO membership. • All certified members of the group must be registered • Compulsory. 	The entities under the SCGM are registered as Group Members	<p>SCGM must make sure that every site that is certified under the scope of the certification of the SCGM is listed as a group member</p> <p>If a group member that is certified under the SCGM wants to be listed as subsidiary of the parent entity, they would be allowed. Taking into account the Group membership rule on the subsidiary relationship.</p>
4	Group of entities operating under a common brand, trading or business name	<p>A collection of entities operating under the same brand name, trading or business name either:</p> <ul style="list-style-type: none"> • For marketing, administrative, management and other economic purposes; or • With common economic, social and cultural needs, aspirations and objectives. 	<ul style="list-style-type: none"> • Public declaration of the group, for example through website, public announcements etc. • One entity to be designated as the official RSPO membership holder • Voluntary 	Each entity within the group is registered as Group Members.	<p>Companies that operate under the same brand name can appoint a parent company who would represent the brand and hold the membership.</p> <p>All the owners of the companies under the same brand would have to agree and accept one of the companies to be the “Parent” entity by signing in the letter of agreement.</p> <p>The “Parent” company would then be responsible to the list of companies that is under their group. These companies must be listed as a group member (declared) via their MyRSPO.</p>

5	2 or 3-tier cooperatives or cooperative unions	Cooperatives whose members are other cooperatives	<ul style="list-style-type: none"> The cooperative holds the RSPO membership. Voluntary. 	The cooperative members are registered as Group Members	The cooperative members would be able to be listed as a group member to the parent membership. The group members are required to agree to appoint the cooperative as the parent company.
6	Companies having common shareholdings owned by individual(s)	Same individual(s) who own controlling interests in each of the companies forming the group	<ul style="list-style-type: none"> One company within the group is designated as the official RSPO membership holder. Voluntary. 	Each company owned by the common individual(s) are listed as Group Members	<p>The common shareholder of the companies can choose to have one single membership and consolidate the other common share companies to be part of the group member.</p> <p>The group members must be listed as part of the group under their MyRSPO and the parent would take responsibilities over the group.</p>

6.0 Beneficial Ownership

6.1 Definition

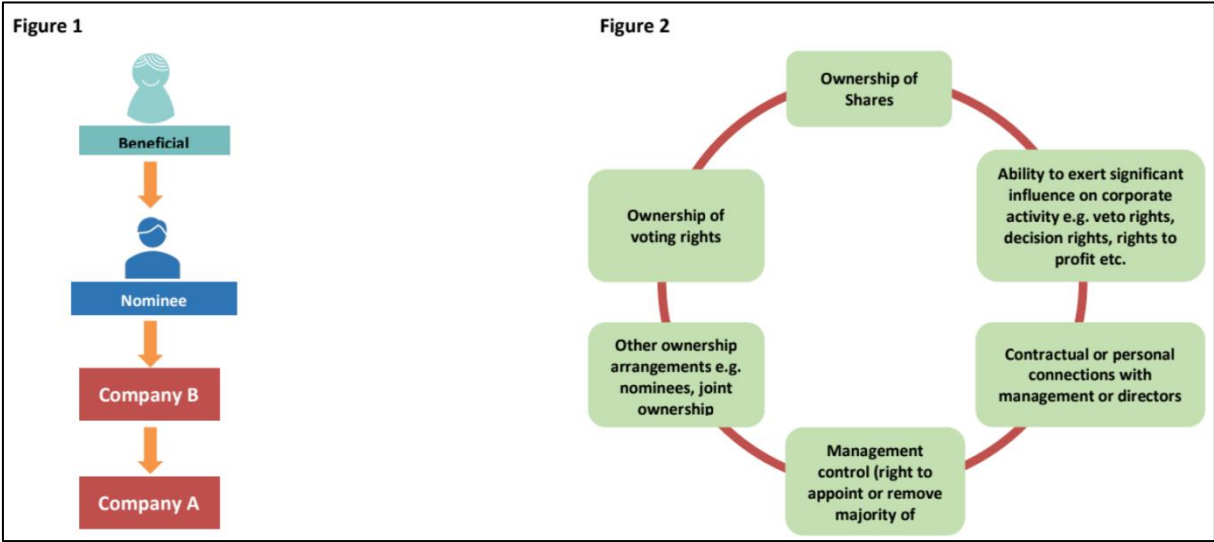
6.1.1 A beneficial owner is a term that refers to a person who enjoys the benefits of ownership of a property or security, where the title or apparent title of the ownership maybe in the name of another person, either directly or indirectly, including ownership and control of an asset through a trust or partnership or an investment fund. Beneficial ownership is distinguished from legal ownership. In most cases, the legal and beneficial owners are the same, and if they are not the beneficial owner may be described as a “nominee”.

6.1.2 To provide a standard definition of beneficial owner for RSPO Membership purposes, we refer to the definitions of the Financial Action Task Force (FATF¹), an inter-governmental body established in 1989 by the Ministers of its Member jurisdictions. It is responsible for setting international standards and promoting effective implementation of legal, regulatory and operational measures to fight against threats to the integrity of the international financial system.

¹ FATF Guidance on Transparency and Beneficial Ownership (www.fatf-gafi.org)

6.1.3 The term beneficial owner refers to the natural person(s) who ultimately owns or controls a legal entity and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal entity or arrangement.

6.1.4 Reference to “ultimately owns or controls” and “ultimate effective control” refer to situations in which ownership/control is exercised through a chain of ownership or by means of control other than direct control as illustrated in Figure 1 below. Common forms of direct and indirect ownership and control are presented in Figure 2 below.

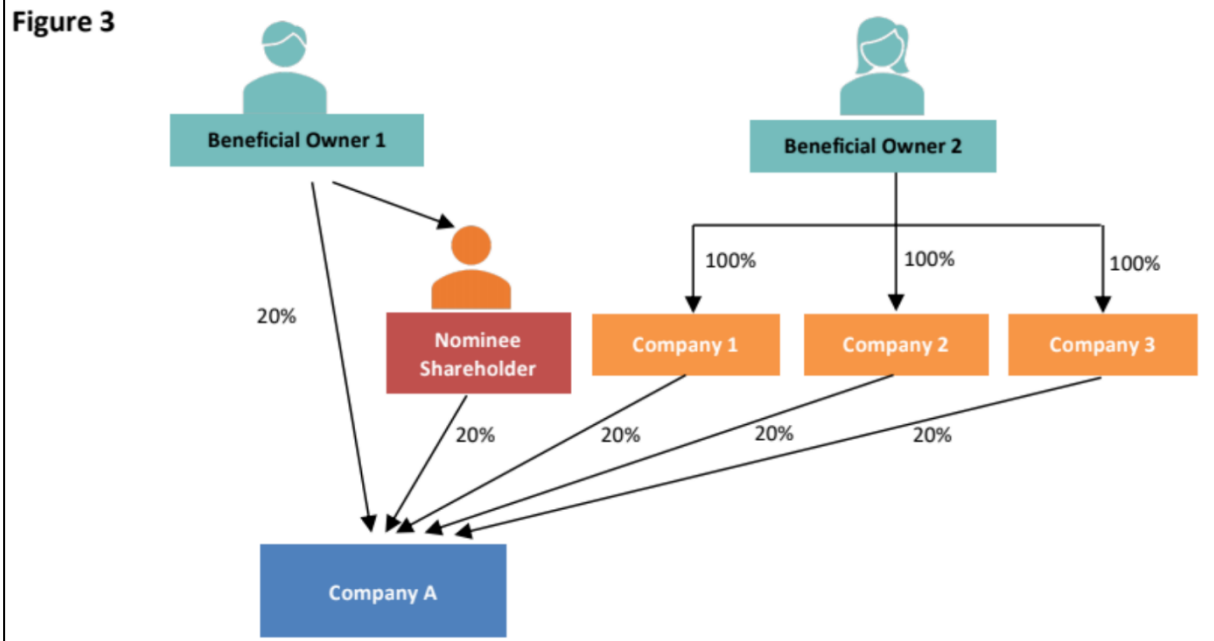


6.2 Determining Beneficial Owners

6.2.1 The beneficial owner is the individual or individuals who effectively owns or controls a legal entity. This ownership or control can be exercised in a variety of ways: for example, holding a controlling ownership interest (defined as 25 per cent or more) of a legal entity. Other ways include control of a significant percentage of voting rights, or the ability to name or remove the members of an entity’s board of directors.

6.2.2 Effective control can be exercised in other ways. For example, control may be evident in influence over or a veto of the decisions that an entity makes, through agreements among shareholders or members, through family links or other types of connections with decision makers, or by holding negotiable shares or convertible stock from an entity.

6.2.3 The beneficial owner(s) of a legal entity must always be individuals (natural persons), who are their owners or controllers, either through direct or indirect means. Neither nominees nor chains of companies should prevent the beneficial owner from being identified. As Figure 3 shows, a company can have two beneficial owners (a woman with 60 per cent through three commercial companies and a man with 40 per cent, including through a nominee), although no direct owner holds more than 25 per cent of the assets (each legal shareholder holds only 20 per cent).



7.0 Membership Obligations

7.1 Membership Fee

7.1.1 A member shall be subject to termination of membership for failing to pay membership fee within three (3) months of having received invoice as described in **Article 8: Termination of Membership of the RSPO Statutes**.

7.2 Annual Communications of Progress (ACOP) Report

7.2.1 Submission of an ACOP report is mandatory for all Ordinary and Affiliate RSPO members that have completed at least one full year at the launch of the official ACOP submission period (as stated in the Section 2: Transparency, Reporting and Claims in the RSPO Code of Conduct for Members).

7.2.2 Submission of an ACOP report for Supply Chain Associate members is voluntary but encouraged to enable the RSPO Secretariat to gain a better understanding of the operations, activities and challenges of Associate members.

7.2.3 Members that are required to submit a mandatory ACOP report face the following sanctions if the report is not submitted within the official submission period:

- (i) Termination: Non-submission of the ACOP report for three (3) consecutive years
- (ii) Suspension: Non-submission of the ACOP report for two (2) consecutive years
- (iii) First Time Warning: First of of non-submission of the ACOP report

7.3 Group Membership

7.3.1 For the purpose of Group Membership, entities that are part of a Group as defined above are referred to as Related Entities.

7.3.2 Related Entities are deemed as Group Members whether or not they are registered as Group Members.

- 7.3.3 The Parent is responsible for disclosing to the RSPO Secretariat the Related Entities in its Group by way of **Self Declaration**. The RSPO Secretariat may from time to time, request from the Parent its consolidated financial statements or other relevant legal documentation to prove Control of its Related Entities.
- 7.3.4 To determine the membership sector of the Group, the Parent shall consider the principal activities of the Group and determine the business activity that contributes the most to either the Group's consolidated revenue or its tangible assets in relation to the palm oil supply chain.
- 7.3.5 Where entities are owned or controlled by the same beneficial owner, such entities shall be deemed to be part of a Group. The definition and identification of beneficial ownership are described in Clause 6.0
- 7.3.6 For the purposes of RSPO certification and trading of CSPO, the Related Entities must be registered as Group Members.
- 7.3.7 Members who fail to comply with this rule shall be dealt with in accordance with the RSPO Code of Conduct.

7.4 Beneficial Ownership

- 7.4.1 Where beneficial owner is identified and subject to Clause 7.3.1 and Clause 7.3.2, whether the entities exist within a Group Membership or holds separate membership or registered across any membership categories, all such entities that are effectively being owned or controlled by the same beneficial owner, shall effectively be deemed to be part of a Group for all intent and purpose in relation to compliance with the Statutes, Code of Conduct, and all key documents and procedures of the RSPO.