

## Particulars

### About Your Organisation

#### 1.1 Member Name

Marks and Spencer plc

#### 1.2 Membership Number

3-0009-06-000-00

#### 1.3 Membership Sector

Retailers

#### 1.4 Membership Category

Ordinary

#### 1.5 Country

United Kingdom

### 2.0 Does your company or organisation produce, process, consume or sell any palm oil or any products containing derivatives of palm oil?

Yes

### 2.1 Please select all description(s) that describe the palm oil-related activities of your company or organisation. Multiple selections are allowed, and not limited to the primary sector of the member's RSPO membership. You will be required to complete the relevant ACOP section based on your selection(s).

- I own and operate oil palm estate(s) and/or palm oil mill(s)
- I represent a palm oil Independent Smallholder farmer Group
- I own and operate independent palm oil mills
- I own and operate independent palm kernel crushing plants - Processors and/or Traders
- I trade or broker palm oil, palm kernel oil or related products - Processors and/or Traders
- I am a refiner of palm oil or palm kernel oil - Processors and/or Traders
- I am a processor of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
- I am a B2B distributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
- I manufacture final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by 3rd party contractors - Consumer Goods Manufacturers
- I retail final consumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
- I operate food retail outlets that use palm oil, palm kernel oil or related products - Retailers
- I am a conservation and environmental NGO supporting the sustainable development of the palm oil industry
- I am a social and human development NGO supporting the sustainable development of the palm oil industry

## Retailers

### 1. Operational Profile

**1.1 Please state your company's main activity(ies) within the palm oil supply chain. Please select all options that apply to your operations.**

- Retail - with own brand products
- Retail - without own brand products
- Food service providers
- Retail wholesalers
- Other

Other

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### 2. Palm Oil and Certified Sustainable Palm Oil Consumption

*Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the RSPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.*

**2.1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are owned and/or managed by the member, including those under Group Membership**

We buy own label products - food, beauty and some home products from suppliers around the world that use palm oil as an ingredient

**2.1.1 In which markets does your company sell goods with palm oil and oil palm products?**

Europe ,North America ,Malaysia,Indonesia,Rest of the World

**DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:**

an aggregate level (as in previous ACOP reporting cycles)

**2.2 Total volume of RSPO-certified (IP, MB, SG and RSPO Credits/Book and Claim) and Non RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand products. Third-party brand products containing palm oil should be excluded.**

Description	Tonnes
Total volume of crude palm oil (tonnes)	4536.07
Total volume of crude palm kernel oil (tonnes)	301.39
Total volume of palm kernel expeller (tonnes)	0.00
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	885.63
Total	5723.09

**2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question RT.2.2) derived from palm oil or from palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based derivatives.**

Description	Percentage
Palm oil-based derivatives and fractions	85
Palm kernel oil-based derivatives and fractions	15

**2.3 Please estimate the regional distribution of your company's uncertified and certified palm oil, palm kernel oil and related products sales (as declared in Question 2.2) in the following countries/regions.**

Countries/Regions	Percentage
Europe	96
North America	1
Malaysia	1
Indonesia	1
China	0
India	0
Latin America	0
Africa	0
Rest of World	1

**2.4 Total volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand products. Third-party brand products containing palm oil should be excluded.**

Description	Crude/Refined Palm Oil (CSPO)	Crude/Refined Palm Kernel Oil (CSPKO)	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	0.10	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00	0.00
Mass Balance (MB)	82.18	1.39	0.00	677.43
Segregated (SG)	4453.80	300.00	0.00	208.20
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	4536.08	301.39	0.00	885.63

**2.4.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question RT.2.4) derived from RSPO-certified palm oil or from RSPO-certified palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based**

Description	Percentage
Certified Palm oil-based derivatives and fractions	80
Certified Palm kernel oil-based derivatives and fractions	20

**2.5 According to the volume information you have provided in Question 2.2 and Question 2.4, your company's Certified Sustainable Palm Oil uptake is:**

100.00%

**2.5.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake. This may include your usage of RSPO Credits to cover gaps in certified uptake, changes due to business environment, variations due to stock positions or efforts to support independent smallholders beyond volume commitments.**

To ensure we don't contribute to deforestation, 100% of the palm oil and palm-based ingredients in our food own-brand products are certified to sustainable standards set by the Roundtable for Sustainable Palm Oil (RSPO), with 98% from a segregated source. The remaining 2% are palm oil derivatives and fractions where RSPO-segregated is unavailable or unviable, and certified to a mass balance scheme. Our target is to source 100% segregated responsibly sourced palm oil by 2025/26 and we updated our Palm Oil Policy in 2023 to drive progress with our suppliers.

For the mass balance palm oil derivatives in our supply chain, we working with our suppliers and multi-stakeholder organisations like the Retail Palm Oil Group and the UK Sustainable Commodities Initiative to increase the availability of RSPO-segregated palm derivatives and fractions and create an action plan to achieve compliance with upcoming EU Deforestation Regulation (and anticipated UK Forest Risk Commodities legislation).

In addition to sourcing RSPO-certified palm oil we extend our commitment beyond our direct supply chains by partnering with Forever Sabah, a non-profit organisation, where we have supported the audit and successful RSPO certification of smallholders in Malaysia. This collaborative effort not only safeguards forests but also empowers local smallholder farmers to cultivate palm sustainably, enabling more RSPO certified sustainable palm to come to market. We are continuing our investment and have also partnered with Pacos Trust, a non-profit organisation, to deliver workshops to support smallholders in their understanding of human rights and gender issues in their community.

**2.6 Please estimate the regional distribution of your company's RSPO certified palm oil, palm kernel oil and related products (as declared in Question RT.2.4) in the following countries/regions:**

<b>Countries/Regions</b>	<b>Percentage</b>
Europe	96
North America	1
Malaysia	1
Indonesia	1
China	0
India	0
Latin America	0
Africa	0
Rest of World	1

### 3. TimeBound Plan

**3.1 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products**

2009

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**3.1.1 If the previous target year has not been met, please explain why.**

We met our target

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**3.2 Which year did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil, palm kernel oil and related products from any supply chain option in own-brand products.**

2009

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

We met our target

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**3.3 Which year did your company begin (or expects to begin) using only RSPO-certified sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in own-brand products.**

2019

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

We have now achieved 100% physical palm oil purchase (MB and SG).

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**3.4 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why**

They do cover all countries

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#### 4. Trademark Use

##### 4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?

No

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##### 4.3 Please explain why your company does not plan to use the RSPO Trademark in own-brand products

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

Others

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## 5. Actions for Next Reporting Period

### 5.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)

- Participation in RSPO Working Group or Task Forces
- Support Independent Smallholders (ISH)
- Contribute to the RSPO Smallholder Trainer Academy
- Financial contribution to the RSPO Smallholder Support Fund
- Direct investments in Smallholder Certification projects
- Involvement/direct investments in Jurisdictional/Landscape approach
- Direct/collective investments in conservation and restoration initiatives
- Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
- Allocating FTE to promote the production or consumption of certified sustainable oil palm products
- Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
- No activities planned
- Others

#### Other

M&S have invested in programs led by Forever Sabah to support smallholders in Malaysia to achieve certification as producing sustainable palm oil according to RSPO Independent Smallholder Standards. The scheme is expanding to more villages and we continue to engage with Forever Sabah on the success and scale of their certification work.

This collaborative effort not only safeguards forests but also empowers local smallholder farmers to cultivate palm sustainably, enabling more RSPO certified sustainable palm to come to market. We are continuing our investment and have also partnered with Pacos Trust, a non-profit organisation, to deliver workshops to support smallholders in their understanding of human rights and gender issues in their community.

We updated our Palm Oil policy in 2023 to specify a requirement for all suppliers to achieve 100% RSPO (or equivalent) segregated palm derivatives and fractions by 2025.

## Shared Responsibility

*The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on <https://rspo.org/members/shared-responsibility> or email the Shared Responsibility team at [sharedresponsibility@rspo.org](mailto:sharedresponsibility@rspo.org).*

### SR 1. Transparency

**1.1 Does your organisation have organisational management documents publicly-available?**

Yes

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### SR 2. Ethical Conduct

**1.2 Does your organisation have a publicly-available policy covering Ethical Conduct, including for recruitment and contractors?**

Yes

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### SR 3 and SR 4. Legal Compliance

**1.3 Does your organisation comply with all applicable legal requirements?**

Yes

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**1.4 Does your organisation require its third party contractors to comply with legal requirements?**

Yes

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### SR 7. Claims and labels

**1.7a Does your organisation promote the use of off-product RSPO claims and labels?**

Yes

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### SR 8. Information and outreach activities

**1.8 Does your organisation implement transparent communication and outreach activities to promote sustainable palm oil?**

Yes

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### SR 9. Human Rights

**1.9 Does your organisation have a publicly-available Policy on respect for human rights, including for suppliers and sub-contractors?**

Yes

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**SR 10. Complaints & Grievances****1.10 Does your organisation have a Grievance Mechanism that is accessible to all affected parties?**

Yes

**1.10.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?**

Yes

**SR 11 and SR 12. Land Use and FPIC****1.11a Does your organisation have a policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the operational Palm Oil Supply chain?**

Yes

**1.11a.1 Does your organisation have a procedure in place to identify legal, customary or user rights, and people entitled to compensation?**

Yes

**SR 13 and SR 14. Smallholders inclusion****1.13 Does your organisation support oil palm smallholders (groups)?**

Yes

**SR 15 - SR 20. Labour & Labour Rights****1.15 Does your organisation have a publicly-available policy covering Labour & Labour Rights?**

Yes

**1.15.1 Does the policy cover:**

- No discrimination and equal opportunities
- Pay and conditions of the workers.
- Freedom of association and Collective bargaining
- Protection of children and remediation for suppliers and third party contractors.
- Prevention of all forms of harassment, including sexual harassment
- No forced or trafficked labour

**SR 21. Occupational Health & Safety****1.21 Does your organisation have a publicly-available Policy covering Occupational Health & Safety?**

Yes

**SR 22. Waste Management****1.22a Does your organisation have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?**

Yes

**1.22a.1 Is this plan implemented?**

Yes

**SR 23. Water Management****1.23 Does your organisation have a water management plan to promote efficient use and continued availability of water sources?**

Yes

**1.23.1 Is this plan implemented?**

Yes

**SR 24. Energy Use****1.24 Does your organisation have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?**

Yes

**1.24.1 Are there records of implementation of the plan ie. monitoring and reporting?**

Yes

**SR 25. Climate Change and Greenhouse Gases (GHG)****1.25 Does your organisation have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?**

Yes

**SR 26. Promotion of certification/uptake**

**1.26b Does your organisation meet the SR CSPO uptake target?**

Yes \_\_\_\_\_

**SR 27. Sustainable Palm Oil Policy**

**1.27a Does your organisation have other relevant policies as a sustainable palm oil sourcing policy?**

Yes \_\_\_\_\_

**SR 28 and SR 29. Support and resourcing**

**1.28 Does your organisation provides services and support to RSPO and resources to implement SR?**

Yes \_\_\_\_\_

## Challenges and Support

### 1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- No challenges faced
- Others

#### Others

Challenges from our suppliers in sourcing RSPO segregated palm derivatives and fractions where RSPO-segregated is unavailable or unviable (i.e. glycerine)

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### 1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?

- Communication and/or engagement to transform the negative perception of palm oil
- Engagement with business partners or consumers on the use of CSPO
- Engagement with government agencies
- Engagement with peers and clients
- Promotion of CSPO through off product claims
- Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
- Promotion of physical CSPO
- Providing funding or support for CSPO development efforts
- Research & Development support
- Stakeholder engagement
- No actions taken
- Others

#### Others

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investment and have also partnered with Pacos Trust, a non-profit organisation, to deliver workshops to support smallholders in their understanding of human rights and gender issues in their community.

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**1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here**

Corporate webpage: <https://corporate.marksandspencer.com/sustainability/our-products/food-raw-materials/palm-oil>

M&S Palm Oil policy (publicly available): <https://corporate.marksandspencer.com/sites/marksandspencer/files/marks-spencer/Palm-oil/MS%20Palm%20Oil%20Policy%20-%20Nov%202023.pdf>

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