Nestlé’s Labor Rights Action Plan for Palm Oil

Last updated: April 2021

1. BACKGROUND

Definition
For the purpose of this document, labor rights designate both legal rights and human rights relating to labor relations between workers and employers. These rights are codified in national and international labor and employment law, including the International Covenant on Economic, Social and Cultural Rights and the eight International Labour Organisation (ILO) fundamental conventions. Regarding Labor Rights in Agricultural Supply Chains, the ILO Convention No. 181 on Private Employment Agencies and ILO recommendation 115 on Workers Housing are of particular relevance.

As it pertains to issues related to labor rights in palm oil, the following seven basic labor standards are of particular relevance according to Verité’s research¹:

1. Ethical recruitment
2. Prohibition of all forms of forced or compulsory labor, including trafficking in persons
3. Prohibition of child labor
4. Prohibition of discrimination and violence
5. Fair wages and benefits
6. Humane working hours
7. Freedom of association

Context and trends
Palm oil plantations and mills require labor-intensive processes. These are often established on vast landholdings in remote locations. Workers are vulnerable to

¹ Verité Palm Oil Producers’ Toolkit on Labor Rights, available at www.palmoiltoolkit.org
adverse working conditions that can include long working hours, low wages, inadequate social security, unsafe working conditions, unreasonable movement restrictions, and limited access to communication. Payment systems and wage structures can contribute to child and forced labor risks and unequal treatment of women workers while employment arrangements sometimes limit workers’ ability to organize and collectively advocate for better conditions. Risks are compounded for workers recruited unethically, in particular migrants who may pay excessive fees and expenses to get the job and may not be provided the right papers and immigration status to allow them to work legally and safely in the host country.²

According to research by Verité, in countries that rely heavily on migrant labor, practices such as retention of passports and other valuable documents and withholding or underpayment of wages are common. Undocumented or irregular migrants, who are at risk of deportation or harassment by authorities and local citizens, also face systemic restrictions on freedom of movement and heightened vulnerability to forced labor.

2. NESTLE’S POSITION AND ACTION

Why is this issue relevant and important for us?

Human rights abuses, including labor rights violations, are unacceptable. We take our responsibility to ensure human rights are respected and upheld throughout our value chain very seriously. Safeguarding the rights of people who work in our supply chains helps build a resilient, stable and sustainable supply chain. It is an essential part of how we, as a business, live our values. This is more important than ever as the COVID-19 pandemic has exacerbated some of the vulnerabilities facing workers, in particular migrant workers, in the sector.³

We are committed to respecting and promoting human rights, including labor rights, in our entire supply chain, and we expect the same of our suppliers. Nestlé’s overarching commitment to labor rights in our supply chains is documented in our

² Verité Palm Oil Producers’ Toolkit on Labor Rights, available at www.palmoiltoolkit.org
Responsible Sourcing Standard (RSS), which defines the requirements and ways of working that we apply together with our suppliers to ensure the sustainable long-term supply of materials and services to Nestlé. It sets out basic non-negotiable standards as well as important and urgent sustainability practices that we ask our suppliers, their employees, agents and subcontractors to respect and to adhere to at all times when conducting business.

Nestlé sources palm oil from 88 suppliers, originating from at least 1,672 mills in 21 countries. Most of the palm oil that we source originates in Malaysia and Indonesia, however there are also origins across Latin America, Africa, and other parts of Asia. Labor rights abuses are prevalent across the palm oil sector in many of these countries and we aim to prevent and address these issues and their root causes wherever they occur.

Relevant commitments and policies
Nestlé Corporate Business Principle
Nestlé Responsible Sourcing Standard

Our vision and position
Our vision is one of a sustainable palm oil sector, where nature is protected and restored, where human rights, including labor rights, are respected, where workers and smallholder farmers are offered decent work and livelihoods.

We are committed to respecting and promoting human rights, including labor rights, throughout our supply chain. We are working towards a palm oil supply chain where all workers, at all tiers of production, work and live in safe and healthy conditions, are provided contracts detailing their working conditions, are paid fairly, have the right to associate freely and collectively bargain and have access to grievance mechanisms.

To realize this vision, we are working to prevent and address labor rights abuses at two complementary levels by: 1) Taking action in our supply chain with our partners and our suppliers, to assess, address and remediate labor rights risks and, 2) Helping tackle root causes through collective action and engagement with all relevant
stakeholders, including workers, non-governmental organizations (NGOs) and governments.

It is only by combining these two levels of intervention that we will be able to make a difference. Actions in our supply chain need to be supported by key local and regional stakeholders (including governments, multilateral organizations, peer companies, suppliers and NGOs) in order to be scaled up and have a long-lasting impact. Our engagement efforts with key stakeholders need to be fact-based, backed up by the experience, insights and the expertise we and our partners develop through our field interventions.

**Our actions to date**

Our approach to addressing labor rights in our palm oil supply chain builds on several years of experience. Between 2010 and 2017, our approach was based on conducting site assessments against our Responsible Sourcing Standard and working together with our suppliers and partners to develop time-bound action plans to address the gaps found while reviewing progress regularly. We also supported suppliers, mills, plantations and smallholders in our supply chain to address specific labor rights risks, such as forced labor and child labor, through issues-specific, targeted interventions.

In 2017, we commissioned the Danish Institute for Human Rights and Earthworm Foundation to conduct a labor rights assessment of Nestlé’s Indonesian palm oil supply chains. Based on the recommendations coming from this assessment, Nestlé developed its first comprehensive *Action Plan on Labor Rights in Palm Oil Supply Chains* in 2018. This was implemented by working with expert organizations on labor rights and suppliers to systematically assess labor risks in the upstream of our supply chains, complementing existing analyses of our suppliers’ operations.

This action plan also led to the development of guidance and pilots on specific issues, knowledge sharing, and deployment of new tools. These include:

- **Guidelines for Fair Target-Setting and Wage Policies in Oil Palm Plantations**
  developed by our partner Earthworm Foundation

*Nestlé reserves the right to update this action plan at any moment.*
- **Child Risk Assessment Framework** and **Mitigating the Risks of Child Labor in Oil Palm Plantations** developed by Earthworm Foundation
- **Human Rights Based Due Diligence Tool on Ethical Recruitment** developed by Earthworm Foundation
- **Third-party worker helpline** to enable workers to safely report on concerns related to working conditions and recruitment practices, co-developed by the Responsible Business Alliance and ELEVATE
- Verité’s **Palm Oil Producers’ Toolkit on Labor Rights**

In 2018, Nestlé commissioned Verité to conduct a **Management Systems Assessment** of how we manage labor rights challenges in our palm oil supply chain globally. In 2019, Verité deepened this assessment by conducting in-depth reviews of two of our suppliers in order to understand how Nestlé Responsible Sourcing Standard translates to practices throughout the supply chain. Verité conducted comprehensive labor and occupational health and safety assessments of seven mills and 11 in Indonesia and Malaysia that collectively employ over 4,000 workers, including interviews with over 200 workers. The results and recommendations made in this assessment led to the revision of our labor rights approach in palm oil as laid out in the following sections.

**Our approach going forward**

1) **Taking action in our supply chain with our partners and suppliers**

Our work to date has made progress in the sites in certain segments of our supply chain. It has also generated new tools and approaches, which can be deployed for further impact. Our approach going forward is focused on the systematic deployment of our labor rights requirements through our supply chain to more comprehensively cover workers across all parts of our supply chain and reach transformation at scale.

**Implementing a Program Assurance Framework for Labor Rights in Palm Oil**

Building on ten years of experience in addressing labor rights challenges in the palm oil sector, we developed, together with our partner Verité, a Program Assurance Framework to increase the reach and impact of our labor rights work. This builds on the Verité Palm Oil Producers’ Toolkit on Labor Rights, which we have supported.
The objective of the Program Assurance Framework is to cascade our policy throughout our palm oil supply chain via the implementation of effective management systems for assessing, addressing, and remediating labor rights issues.

This Framework was piloted with one of our key suppliers in 2020. We provided capacity building to their field team to help them understand the root causes of the issues and develop solutions that address labor rights risks and ensure compliance with legislation and with our Responsible Sourcing Standard.

In 2021, we are testing the Framework with additional suppliers. Based on this experience, we will make the necessary adjustments before rolling it out across our full supply chain starting in 2022 as part of our strengthened supplier management system for establishing a responsibly sourced palm oil supply chain.

**Development and deployment of issue-specific guidance and tools**

Over the years, we have directly and indirectly supported the development of a number of guidelines and tools aimed at helping palm oil buyers and producers to understand and address specific labor-related issues.

Going forward, we will be using these to demonstrate and scale on-the-ground solutions with palm oil plantations and mills in our supply chain to immediately address salient labor rights issues, starting with those identified as high-risk as part of our supplier engagement prioritization (see 2021-2025 Action Plan section below). We will train management teams at sites on the use of these tools and document these efforts to capture and share lessons learned. The demonstration of these solutions in practice will be further scaled via the implementation of our Program Assurance Framework and through our industry collaborations.

**2) Tackling root causes through collective action**

Labor rights violations are endemic to the palm oil industry. In order to systematically address them, strong and collective action is needed to transform the industry and raise standards.
We are committed to better understanding and helping tackle the root causes of this serious issue in close collaboration with workers, governments, multilateral and non-governmental organizations, peer companies, certification bodies, individual experts, and our partners.

**Participating in landscape initiatives**

To make progress on labor rights and scale up impact, we must take, collectively, bolder and more urgent action. This is why we will be incorporating labor rights components in at least four landscape initiatives we are involved in 2021 as well as support the development of a landscape level monitoring and reporting framework for labor rights.

To address labor risks in these selected landscapes, Nestlé and its partners will work with various stakeholders to determine priority issues in the local palm oil supply chain and collaborate to deploy solutions that can be scaled to improve conditions for workers across the landscape.

Each landscape initiative will tackle the context-specific labor rights issues, which can include fair wages and decent working conditions in Indonesia; ethical recruitment and better protection of migrant workers’ rights in Malaysia as well as improvement in children’s well-being including preventing child labor in both regions.

**Collaborating through industry associations**

We actively participate in various industry associations and multi-stakeholder platforms looking to address sustainability challenges in the palm oil sector in a collaborative manner. The most relevant ones in terms of labor rights are the following:

- The Consumer Goods Forum (CGF)’s [Human Rights – Working to End Forced Labor Coalition](https://www.consumer-goods-forum.org/human-rights-working-to-end-forced-labor-coalition), in particular its Palm Oil and Responsible Recruitment Working Groups. Through the Palm Oil Working Group, we will be collaborating with selected palm oil suppliers to develop and deploy Human Rights Due Diligence (HRDD) systems from the refinery to the plantation level.

_Nestlé reserves the right to update this action plan at any moment._
The Responsible Recruitment Working Group will seek to support responsible recruitment practices in selected countries through industry collaboration.

- The **Palm Oil Collaboration Group (POCG)**’s **Social Issues Working Group** brings together companies in multiple parts of the supply chain and fosters collaboration to address human rights issues, including labor rights, on the ground. The group plans to develop a repository of approaches on HRDD and identify gaps in the tools currently available; develop collaborative actions to address forced labor risks in Malaysia; and support effective remediation mechanisms in relation to land rights in Indonesia.

We are also members of the **Leadership Group for Responsible Recruitment** of the Institute for Human Rights and Business (IHRB) and the **Responsible Labor Initiative** (RLI).

**Advocating for an enabling environment**

In addition, to drive transformation across the sector, we are also leveraging our participation in industry and multi-stakeholder platforms, in particular the Consumer Goods Forum and **AIM**, to advocate for the development of the regulations, policies, programs and incentives that are needed to create a conducive environment for the respect of labor rights.

### 3. 2021-2025 ACTION PLAN

Our Palm Oil Labor Rights Action Plan 2021-2025 is organized around actions that we will take to assess, address, and report on labor rights risks across our palm oil supply chain and is driven by the priorities laid out above. As we test new tools and approaches in 2021, we will take stock of what we learn and refine our approach in 2022. This action plan will therefore be updated to reflect these learnings and ensure our approach remains strong and relevant going forward.

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Assess: Our risk exposure

Salient labor rights issues in palm oil
In 2018, we identified the following labor rights issues as particularly salient following an assessment of labor rights impacts in Nestlé’s palm oil supply chain carried out by the Danish Institute for Human Rights. We continue to address those in priority:

- Forced labor
- Informality of employment
- Children in plantations
- Wage and work hour violations
- Discrimination and harassment
- Non conformances related to worker accommodations and occupational health and safety

Supplier engagement prioritization
As part of our Program Assurance Framework outlined above, we will prioritize suppliers we need to engage based on the following segmentation approach.

First, our supply chains, that is palm oil refineries and their upstream mills and producer base supplying Nestlé, are assessed and segmented against a risk profile based on:

1) Country risks\(^4\) and volumes we purchase.
2) Labor supply chain risks based on the workforce profile in the supply chain.\(^5\)
3) Operational risks based on policies, procedures, and controls in place.

This risk assessment is based on responses provided in a self-assessment questionnaire, supplemented by on-the-ground assessments of a sampling of sites. This will lead to the following segmentation.

\(^4\) Based on reliable third-party data, like US Department of Labor Trafficking in Person report, UNDP Human Development Index or ITUC Freedom of Association country ranking

\(^5\) We will capture the number permanent vs. temporary workers as a way to also capture the proportion of foreign, seasonal, contractual, outsourced workers, etc.
## Supply chain segmentation model

<table>
<thead>
<tr>
<th>High Labor Supply Chain Risks &amp; Low Operational Risks</th>
<th>High Labor Supply Chain Risks &amp; High Operational Risks</th>
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</thead>
<tbody>
<tr>
<td>Refinery has low operational risks due to:</td>
<td>Refinery has high operational risks due to:</td>
</tr>
<tr>
<td>- Significant leverage and control on mills and estates.</td>
<td>- Low leverage and control on mills and estates.</td>
</tr>
<tr>
<td>- No red flags on labor compliance in its own operations.</td>
<td>- Red flags on labor compliance in its own operations.</td>
</tr>
<tr>
<td>Refinery has high labor supply chain risks due to:</td>
<td>Refineries has high labor supply chain risks due to:</td>
</tr>
<tr>
<td>- High percentage of temporary workers.</td>
<td>- High percentage of temporary workers.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Low Labor Supply Chain Risks &amp; Low Operational Risks</th>
<th>Low Labor Supply Chain Risks &amp; High Operational Risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Refinery has low operational risks due to:</td>
<td>Refinery has high operational risks due to:</td>
</tr>
<tr>
<td>- Significant control and leverage on mills and estates.</td>
<td>- Low leverage and control on mills and estates.</td>
</tr>
<tr>
<td>- No red flags on labor compliance in its own operations.</td>
<td>- Red flags on labor compliance in its own operations.</td>
</tr>
<tr>
<td>Refinery has low labor supply chain risks due to:</td>
<td>Refinery has low labor supply chain risks due to:</td>
</tr>
<tr>
<td>- High percentage of permanent workers.</td>
<td>- High percentage of permanent workers.</td>
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## Operational Risks

In a second step, our suppliers’ management system capacity to address labor rights risks in their supply chains is assessed based on the HRDD Model Analysis Tool available in the Verité Palm Oil Producers’ Toolkit on Labor Rights. This approach ranks suppliers’ HRDD systems according to maturity level as follows:

- **HRDD Maturity Level 1 - Getting Started**: Building blocks of a compliance system is in place, in the form of policies, governance structure, understanding of risks inherent in the industry or sector, and identification of external and internal experts.

- **HRDD Maturity Level 2 - Basic good practice**: Basic understanding of labor rights standards and basic compliance mechanisms, effective communication of policies, initial risk assessment of relevant workforce, initial training needs assessment, and efforts are focused on correcting priority issues; might need targeted baseline audits to verify scope of corrective action and remediation.

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• **HRDD Maturity Level 3 - Advanced**: Risk sources have been identified and continuously mitigated, but may not be completely eliminated yet, embedding of human rights policies in contracts or service agreements, adapting approach based on initial learnings with focus on continuous improvement and implementing a formal reporting and review of supplier progress, which may be subjected to verification audits.

• **HRDD Maturity Level 4 - Robust**: System in place to assess, address, and report against core labor issues. No core labor rights violations, risk source have been identified and eliminated, plans to go beyond legal compliance and evolve prevention measures based on lessons learned, with effective system in place to regularly monitor relevant issues, including through worker voice mechanisms and tools, and ongoing measurement of results.

Taken together the supply chain & operational risks and the HRDD Maturity Level assessments will segment our supply chains based on their overall labor rights risks and provides direction on our engagement strategy, actions and monitoring. For example:

<table>
<thead>
<tr>
<th>Risk Assessment</th>
<th>HRDD Maturity Level</th>
<th>Engagement level</th>
</tr>
</thead>
<tbody>
<tr>
<td>High labor supply chain &amp; high operational risks</td>
<td>Low maturity of HRDD systems</td>
<td>HRDD capacity building + supplier action plans to better address salient issues &amp; support for addressing salient rights issues</td>
</tr>
<tr>
<td>High labor supply chain &amp; low operational risks</td>
<td>High maturity of HRDD systems</td>
<td>Program assurance assessments and system improvement plans at refinery level, in addition to issue-focused assessments + corrective action monitoring at the level of the mills and estates</td>
</tr>
<tr>
<td>Low labor supply chain &amp; low operational risks</td>
<td>High maturity of HRDD systems</td>
<td>Monitoring</td>
</tr>
</tbody>
</table>

*Note that this segmentation approach will be tested in 2021 and will be refined based on our learnings.*

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**Address: Our priority actions**

*Nestlé: Taking action in our supply chain with our partners and suppliers*

<table>
<thead>
<tr>
<th>Priority</th>
<th>Activity</th>
<th>Area of Focus</th>
<th>Timeline</th>
</tr>
</thead>
</table>
| Implement the Program Assurance Framework | Assess / Carry out supply chain segmentation to prioritize suppliers and determine engagement priorities | Supply chain | 2021: Test this approach with 5 suppliers  
2022: Refine the approach based on learnings  
2023: Apply approach to all suppliers |
| | Address / Engagement plans:  
Strengthen suppliers’ Corrective Action Plans to incorporate best practice in addressing assessment findings | Supply chain | |
| | Monitor / Report:  
Monitoring system in place to track progress against strategic Key Performance Indicators. | Supply chain | |
| Deploy issue-specific guidance and tools | Deployment of the [Guidelines for Fair Target-Setting and Wage Policies in Oil Palm Plantations](#) | Plantations | 2021: Guidelines piloted at two independent plantations supplying to one of our suppliers  
2022: Systematically include assessment against Guidelines in plantation assessments & monitoring  
2023: Monitor that all suppliers are aware of Guidelines and are cascading them or equivalent ones to their suppliers |
| | Deployment of [Human Rights Based Due Diligence Tool on Ethical Recruitment](#) | Mills & plantations | 2021: Tool piloted with one independent site (mill / plantation) in Malaysia as part |
of a broader landscape initiative. Trial will include field visits, development of a corrective action plan, resource development, and a verification visit

- Train at least 30 staff members from at least five suppliers on the tool
- Build assessors’ capacity to assess sites for unethical recruitment and forced labor following 2019 responsible recruitment assessment training

**2022:**

- Systematically include assessment of use of Tool (or equivalent one) in plantation & mill assessments & monitoring
- Train top ten high-risk suppliers on use of tool and support deployment
- Communicate about the tool to all suppliers in Malaysia

**2025:**

Monitor that all supply chains assessed as at-risk of unethical recruitment use this Tool or equivalent one

<table>
<thead>
<tr>
<th>Implementation of Child Risk Assessment Framework</th>
<th>Plantations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2021:</strong> Train at least 30 staff from at least five suppliers on the use of this Tool</td>
<td><strong>2021:</strong> Train at least 30 staff from at least five suppliers on the use of this Tool</td>
</tr>
<tr>
<td><strong>2022:</strong> Train top 10 high-risk suppliers on use of the Tool and support them in its deployment</td>
<td><strong>2022:</strong> Train top 10 high-risk suppliers on use of the Tool and support them in its deployment</td>
</tr>
<tr>
<td>Use of this Tool (or equivalent) is systematically included in plantations assessments &amp; monitoring</td>
<td>Use of this Tool (or equivalent) is systematically included in plantations assessments &amp; monitoring</td>
</tr>
<tr>
<td>Communicate to all suppliers in countries with risks of child labor</td>
<td>Communicate to all suppliers in countries with risks of child labor</td>
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</table>
| **Deploy the Verité Palm Oil Toolkit** | **Supplier** | **2021:** Pilot the deployment of the Toolkit with one of our suppliers to increase the capacity of its extended upstream suppliers to diagnose and remediate high-risk labor issues by:  
- Supporting capacity building of our supplier’s leadership team to use the Toolkit  
- Developing a guide for refineries to engage with their upstream mills |
| **Provide an effective and safe communication channel for workers to voice issues** | **All supply chain** | **2021:** Expansion of the Suara Kami Helpline to all Sime Darby Plantation workers  
**2022-2025:** Incorporate lessons learned and opportunities from the Suara Kami Helpline roll-out into industry collaborations to ensure all palm oil supply chain workers have access to worker voice mechanisms, starting in Malaysia and Indonesia. |
## Collective action: Helping tackle root causes with all relevant stakeholders

<table>
<thead>
<tr>
<th>Priority</th>
<th>Area of focus</th>
<th>Activity</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leverage existing engagement in landscape initiatives to improve working and living conditions for farmers, workers, and their families⁶.</td>
<td>Landscapes</td>
<td>Incorporate assessing, addressing, and reporting on labor rights within four multi-stakeholder landscape initiatives. Develop a landscape level monitoring and reporting framework for labor rights.</td>
<td>2021</td>
</tr>
<tr>
<td>Industry Collaboration</td>
<td>CGF’s Human Rights – Working to End Forced Labor Coalition</td>
<td>We will actively participate in shaping the Palm Oil Working Group’s Human Rights Roadmap that will be published in 2021. We will also actively shape the work related to supporting the development of responsible recruitment markets, with an initial focus in Malaysia as an important destination country for migrant workers in the palm oil sector.</td>
<td>2021-2025</td>
</tr>
<tr>
<td>POCG’s Social Issues Working Group</td>
<td>We will actively participate in the development of a library of tools for implementing HRDD into management systems for palm oil supply chains. Our contribution will be to share information about the tools we are testing and/or implementing as well as the learnings we are gathering.</td>
<td>2021</td>
<td></td>
</tr>
<tr>
<td>Advocating for an enabling environment</td>
<td>Support mandatory HRDD legislation in</td>
<td>We will continue to contribute to the European Union’s discussions on mandatory HRDD through our active involvement in industry associations, in particular AIM.</td>
<td>2021</td>
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⁶ These landscape initiatives go beyond addressing labor rights. However, for the purpose of this Action Plan we are only referring to actions and activities related to labor rights.

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| support countries | We will leverage our participation in the Consumer Goods Forum’s Human Rights Coalition to engage relevant stakeholders, including governments in producing country, to enable the adoption and enforcement of measures to eliminate forced labor. Our objective is for the Coalition to adopt a government engagement plan and we will use our voice to this end. | 2021-2025 |

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**Report on KPIs, overall performance and challenges**

We are committed to transparently communicating about the progress we make in implementing this action plan, as well as share our learnings and the challenges we face. We will be publicly reporting on this in our annual Palm Oil Responsible Sourcing Progress report.

For reporting years 2021 and 2022, we will be reporting on the following key performance indicators (KPIs) in relation to this action plan:

1. Percentage of suppliers assessed at each maturity level of HRDD system according to Self-Assessment Questionnaire, drawing on the HRDD Model Analysis Tool of the Verité Palm Oil Producers Toolkit
2. Percentage of suppliers assessed with HRDD systems in place covering their entire supply base, including:
   a. Percentage of suppliers assessed that have published a human rights policy that includes a commitment to uphold labor rights
   b. Percentage of suppliers assessed that have shared list of salient issues
   c. Percentage of suppliers assessed that have a management process in place to assess, address, and report on labor rights risks
3. Percentage of palm oil volumes ‘Delivering’ & percentage of palm oil volumes ‘Progressing’ vs. the NDPE Implementation Reporting Framework (NDPE IRF) for No Exploitation

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In parallel, we will be developing more impact focused KPIs, including for our landscape related work, and will start reporting on those as of 2023.

4. GOVERNANCE

The governance of this Action Plan will be led through the Nestlé ESG and Sustainability Council and its Responsible Sourcing Workstream.

5. OUR PARTNERS

For the purpose of this work, our main implementing partners will be Earthworm Foundation, Verité and Business for Social Responsibility (BSR).

In addition, we will be sharing our learnings and exploring paths to scale impact through our participation in the Consumer Goods Forum’s Human Rights – Working Towards Ending Forced Labor Coalition, the Palm Oil Collaboration Group (POCG)’s Social Issues Working Group, the IHRB Leadership Group on Responsible Recruitment, and the Responsible Labor Initiative.