

GVL Sustainability Action Plan  
February 2020 Update

1. Strengthening of Operational Processes, Compliance and Governance

Most of the actions related to strengthening of processes, including updates of SOPs, alignment between functions and governance, have been completed. Monitoring to ensure proper execution and compliance continues to be done.

2. HCS and Environmental Management

Maps of HCS before land development started and current status have been submitted for review to the HCSA in January 2020. HCS verification and remediation planning will be the focus in Q1/Q2.

3. Social and Community Engagement, Grievance Management and Conflict Resolution

Mediation process with complainant communities (Butaw, Blogbo, DWN) suspended on RSPO instructions after Blogbo objections about EF role. Selection of new facilitator by RSPO done and mediation by ProForest for Tarjuowon community have begun with first field visit starting 16<sup>th</sup> of March.

Conversion of provisional to permanent MoUs ongoing. Liberian Land Authority (LLA) offered assistance to communities in negotiations in relation to land rights. Process slowed because of LLA resource constraints.

4. Community-based Monitoring

Done through Kumacaya project run by EF. Second set of reports received in February and is being reviewed.

No	Area	Activity	Sub-activity	Update 31st October 2019	Update 31st Jan 2020
<b>A</b>	<b>GOVERNANCE</b>				
A.1	Structure	A.1.1 Review and strengthen organization structure (especially the sustainability team and GIS team) to allow clear role and collaboration between teams.	A.1.1.1 Review and finalization of organization structure A.1.1.2 Establish role function, job description, and authority level A.1.1.3 Resource audit and hiring of relevant people to fill in any gaps in the structure A.1.1.4 Socialization and implementation of new organization structure A.1.1.5 Evaluation of organization structure	Completed. Drafts completed. Awaiting Management review as part of company-wide restructuring. Target completion Dec 2019. Audit completed. Will initially focus on internal recruitment/realignment as a result of involuntary down-sizing. Completion Jan 2020. Yet to commence. Target shifted to possible restructuring. Adjusted target date Mar 2020. On-going. Adjusted target Mar. 2020.	Completed. Completed. Under implementation, with Quarterly KPI setting Completed. Commenced. Target date Mar 2020 on course. On-going. Target date Mar. 2020 on course
A.2	Coordination and Oversight	A.2.1 Establish regular meetings on sustainability issues A.2.2 Establish sustainability related Key Performance Indicators	A.2.1.1 Establish regular meeting on mill/plantation level and regional level A.2.1.2 Establish sustainability steering committee and its regular meeting A.2.2.1 Establish clear KPIs for sustainability team A.2.2.2 Establish additional sustainability related KPIs for non-sustainability teams A.2.2.3 Evaluation of KPIs	On-going. On-going. Done. On-going. First assessment targeted Apr. 2020.	On-going. On-going. Done. On-going. First assessment targeted Apr. 2020.
A.3	Talent and Culture	A.3.1 Training / Capacity Building	A.3.1.1 Conduct training needs assessment to create sustainability training plan for relevant people A.3.1.2 Implement and establish a training record	On-going. Target Dec 2019. On-going.	On-going. Adjusted target Mar. 2020. On-going.
A.4	Infrastructure and logistics	A.4.1 Establish relevant policies and SOPs	A.4.1.1 Establish SOP on stakeholder management A.4.1.2 Establish SOP and system to track legal requirement A.4.1.3 Establish SOP for boundary demarcation and its maintenance A.4.1.4 Review and update FPIC and PM SOP according to: Module 2 – Social requirements (version 2.0 May 2017) Module 3 – Integration of HCV HCS Forest and FPIC (version 2.0 May 2018) FPIC guide for RSPO members A.4.1.5 Establish SOP for participatory mapping for disputed areas A.4.1.6 Establish SOPs for mill operations in appropriate languages A.4.1.7 Establish SOP for monitoring of environmental management plan, implementation, and reporting A.4.1.8 Establish SOP for HCV HCS Peat management and monitoring A.4.1.9 Establish SOP and system for grievance handling for both external and internal stakeholders. Also add mediation step before legal option. A.4.1.10 Establish SOP to describe the process of information sharing and dissemination A.4.1.11 Review the recently announced Human Rights Defender Protection protocol by the RSPO and develop policy on human rights A.4.1.12 Review Greenbook SOP to be clearer on pest attack intensity and IPM A.4.1.13 Revise Greenbook SOP section 6.5.3 on empty pesticide package disposal A.4.1.14 Review recruitment policy to include a statement on no recruitment of workers under 18 years old A.4.1.15 Review recruitment policy to include non discrimination based on sexual orientation, union membership, and political affiliation A.4.1.16 Update policy of promotion to include non-discrimination promotion A.4.1.17 Establish policy to ensure no harassment or abuse in the work place and reproductive rights are protected A.4.1.18 Establish policy on forced trafficked labor A.4.1.19 Establish SOP for waste management that cover all of the waste produced by operational including domestic waste. A.4.1.20 Establish policy to circumvent instigated violence to maintain peace and order A.4.1.21 Establish SOP for third party FFB sourcing A.4.1.22 Establish SOP for pollution and GHG emission mitigation or reduction	On-going. Target Dec 2019. On-going. Target Dec 2019. On-going. Target Dec 2019. Completed and being implemented. Awaiting official management approval. Target Dec 2019. On-going. Adjusted target Dec 2019. SOP done; language translation yet to commence. Target Mar 2020. Draft almost completed. Adjusted target Dec 2019. Draft almost completed. Adjusted target Dec 2019. Draft almost completed. Adjusted target Dec 2019. Draft almost completed. Adjusted target Dec 2019. Draft almost completed. Adjusted target Dec 2019. Draft almost completed. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019. On-going. Adjusted target Dec 2019.	Completed. Completed. Under implementation Completed. To be tested in Q2 2020. Completed and being implemented. Approved by Mgt. Draft completed. Awaiting testing under Blogbo dispute in Mar-Apr 2020. SOP done; language translation yet to commence. Target Mar 2020. Completed. Under test. Draft completed. Awaiting testing under EF assessment Q2 2020. Completed. In use. Completed. On-going. Adjusted target Apr. 2020. Completed. Completed. Completed. Completed. Completed. On-going. Adjusted target Apr. 2020. Completed. Completed. Completed.

A.4.2	Data and document management	A.4.2.1	- Establish clear filing system for data and documents - Ensure that documents and records are protected and retrieval (clarify the responsibilities and authorities for back up and the medium to be used) - Establish systematic endorsement of documents shared with the communities (meeting minutes, maps, etc.)	Completed. In operation.	Completed. In operation.
		A.4.2.2	Establish a clear hand over procedure and induction for new personnels on sustainability	On-going as part of restructuring process. Adjusted target Dec 2019.	Completed.
		A.4.2.3	Strengthen the sustainability team in the documentation and filing system (hard and soft copy). Need to be enforced through KPIs	Done. In operation.	Done. In operation.
		A.4.2.4	Strengthen the capacity of the sustainability team to ensure rigorous data record (meeting minute, evidences, endorsements, ...) for every meeting with communities/ complaints.	Done. In operation.	Done. In operation.
		A.4.2.5	Evaluation of data and document management	Yet to commence. Target Apr. 2020	Yet to commence. Target Apr. 2020
A.4.3	Tracking of legal	A.4.3.1	Establish a list of legal requirement and the copy of laws and regulations	Completed.	Completed.
		A.4.3.2	Establish a comprehensive system to track legal requirements, its update and its compliance analysis, including personnel in charge, source of information, and frequency of update to track the regulation and legal law update.	On-going. Target Dec 2019.	On-going. Target Dec 2020.
		A.4.3.3	Conduct an assessment of compliance (internal audit) to ensure that all legal requirements are fulfilled	On-going. Quarterly updates.	On-going. Quarterly updates.
A.4.4	Establish baseline maps	A.4.4.1	Establish clear and agreed baseline maps for: - soil fragility map - slope map - HCV and HCS maps - Community map and participatory maps - Land conflict map / encroachment area - Area planted / developed	Done. In regular use	Done. In regular use
		A.4.4.2	Establish clear guidance on map production, verification, approval and sharing. Ensure that RSPO needs are followed.	Done. In regular use	Done. In regular use
A.4.5	Appropriate logistics	A.4.5.1	Assess the logistic needs of the sustainability and GIS team and plan for their provision (transportation, computers, handheld GPS, etc.)	Done. .	Done. .
		A.4.5.2	Fulfilment of logistical needs	On-going. Procurement of new resources on-going. Target Dec 2019	On-going. Target Mar 2020. Heavily affected by cost-cutting measures.

B ENVIRONMENTAL MANAGEMENT							
B.1	No development of and conservation of HCS areas	B.1.1	Organize a training on the new HCS Approach especially on: oModule 2 – Social requirements (version 2.0 May 2017)	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available	Internal training adjusted to Jan 2020. Exploring appropriate training opportunities in Africa for 2020.	Internal training re-adjusted to Apr 2020. Exploring appropriate training opportunities in Africa for 2020.
				B.1.1.2	Obtain approval from HCSA on the reports and maps	Yet to commence. Adjusted target Jan 2020 to allow for on-going consultation with HCSA.	Commenced. Awaiting outcome of on-going consultation with HCSA.
		B.1.2	Review the previous HCS work (Grand Kru & Sinoe) in alignment with the new HCS Approach toolkit (integration of the community livelihoods programme (COPP perspective and alternative livelihoods)	B.1.2.1	Review all HCS work (Grand Kru and Sinoe) and produce new updated HCS reports and maps to be submitted to HCSA	On-going. Target completion Oct 2019	Done.
				B.1.2.2	Ground check of HCS clearance claim and develop remediation action. Develop and implement the ICLUP (Integrated Conservation and Land Use Planning)	On-going. Target completion adjusted to Dec 2019 due to sever constraints on mobility (road condition).	On-going. Target completion re-adjusted to Apr 2020 as part of EF assessment. Target completion Apr 2020.
				B.1.2.3	Define a prospective land acquisition plan for all the new development (Example: Barclayville, Juazon, etc.)	Yet to commence. Subject to further consideration on the proposed new areas. Expansion drive suspended indefinitely.	Yet to commence. Subject to further consideration on the proposed new areas. Expansion drive suspended indefinitely.
B.2	No development of and conservation of HCV areas	B.2.1	Develop management and monitoring plan as well as implementation for protecting the HCV area.	B.2.1.1	Development of management and monitoring plan according to established HCV maps	On-going. Adjusted target Mar 2020, subject to completion of HCV-HCS re-assessment.	On-going. Re-adjusted target Jun 2020, subject to completion of HCV-HCS re-assessment.
				B.2.1.2	Conduct socialization to Operations, workers and community to increase awareness and protection of HCV and HCS areas	On-going as part of community and employee engagement.	On-going as part of community and employee engagement.
				B.2.1.3	Conduct field inspections conducted regularly to ensure implementation of mitigation plan	Inspection on-going routine. To be reviewed and consolidated subject to completion of HCV-HCS re-assessment by Mar 2020.	Inspection on-going routine. To be reviewed and consolidated subject to completion of HCV-HCS re-assessment by Jun 2020.
B.3	Yield improvement without intensification of use of chemical pesticides and fertilizers	B.3.1	Establishment of integrated pest management	B.3.1.1	Establishment of IPM Plan, which contain identification of potential pests and thresholds, technic use to control (cultural, biological, mechanical and physical methods) pest attacking, identify and plant native species used as part of biological control method refer to SOP and Concession Agreement.	Draft 70% completed . Target date Jan 2020.	Completed.
				B.3.1.2	Having well documented IPM implementation records including records of training to IPM workers	On-going. Target date Dec 2020.	Completed.
		B.3.2	Proper usage of POME for fe	B.3.2.1	Conduct study of the optimum area for POME application for effluent mill with capacity 40 mt FFB/hour and for new pond capacity	On-going. Draft report awaiting Management review and adoption.	Draft report under Management review.
				B.3.2.2	Tarjuowon North (TNRE) estate/TRIM needs to record how much the total POME application, replace broken flowmeter	On-going. Under analysis.	Completed.
				B.3.2.3	Building of additional POME pond	Yet to commence. Subject to on-going research	Yet to commence. Subject to on-going research
B.4	Greenhouse gas emissions	B.4.1	Report and reduce greenhouse gas emissions	B.4.1.1	Conduct assesment of pollution and GHG emission resource from the entire operational aspect	On-going. Target completion Oct 2019	Completed.
				B.4.1.2	Establish action plan to mitigate or reduce the pollution and GHG emission	On-going. Awaiting Management review. Target Dec 2019.	Completed.
				B.4.1.3	Calculate the operational GHG emission using RSPO GHG calculator ver.3.1 and report it to RSPO	Done. Iterrative process.	Done. Iterrative process.
B.5	Waste management	B.5.1	Improve waste management	B.5.1.1	Check BOD and other parameter in POME discharge to plantation refer to regulation.	Done. Iterrative process.	Done. Iterrative process.
				B.5.1.2	Engage the government about the license/permit for the hazardous warehouse base on the EMPL regulation section 64	Engagement done. Licencing process under periodic review.	Engagement done. Licencing process under periodic review.
				B.5.1.3	Stored and disposed used chemicals and their containers responsibly according to GVL Procedure, EMPL and best practices	Done. Iterrative process.	Done. Iterrative process.
				B.5.1.4	Have well documented waste management and disposal plan to avoid or reduce pollution	On-going. Updated plan to be reviewed with EPA for adoption. Target completion Jan 2020.	Completed.
				B.5.1.5	Arrange logbook for hazardous warehouse. Some of the amount must refer to the logbook of general warehouse. For example amount of ex-pesticide bin in to the hazardous warehouse must be consider to the amount of pesticide bin put from chemical warehouse	On-going.	On-going.
				B.5.1.6	Develop the implementation of 3R (Reduce, Reuse, Recycle) and separation of domestic waste into organic and inorganic waste to simplify the management	On-going. Undergoing review to strengthen adoption and monitoring process.	Completed.
B.6	Energy efficiency	B.6.1	Improve energy efficiency	B.6.1.1	Improve efficiency of the use of fossil fuel and optimization of renewable energy	Yet to commence. Background data available and being updated. Target date Apr 2020	Yet to commence. Background data available and being updated. Target date Apr 2020
				B.6.1.2	GVL should calculate how much renewable energy use per ton CPO or palm product, estimated fuel use by on-site contract workers and transport and machinery operations and electricity use in operations.	Yet to commence. Background data available and being updated. Target date Apr 2021	Yet to commence. Background data available and being updated. Target date Apr 2020.

C SOCIAL AND COMMUNITY ENGAGEMENT								
C.1	FPIC Process	C.1.1	Review all FPIC process to fulfill any process and documentation gaps	C.1.1.1	Review and update the FPIC documentation process in alignment with the SOP that will be updated. This include improvement of scoping process and identification of community's self chosen representatives	Done. Awaiting Management adoption.	Completed	
				C.1.1.2	Conduct the boundary demarcation based on FPIC procedure with clear markers and maintain them regularly	In collaboration with Liberia Lands Authority (LLA) . Implementation target dered to 2020, due to review of funding mechanism.	In collaboration with Liberia Lands Authority (LLA) . Implementation target defered to 2020, due to review of funding mechanism.	
				C.1.1.3	Improve ESIA report by conduct participatory SIA assessment . Develop plans for avoidance or mitigation of negative impacts and promotion of the positive and monitoring of impacts	New ESIA yet to be undertaken. Subject to permit renewal schedule. Will incorporate.	New ESIA yet to be undertaken. Subject to permit renewal schedule. Will incorporate.	
				C.1.1.4	Develop a monitoring system with regular reporting to outline the plan on mitigation, implementation and monitoring according to the SIA report	Yet to commence.	Yet to commence.	
	C.1.2	Review all MOUs to fulfill any process, documentation gaps and the implementation level of each MOUs signed	C.1.2.1	Converting provisional MOUs to permanent MOUs, whether to include maintenance and refurbishment schedules (for specified period) in updated Social Agreements	C.1.2.1	Converting provisional MOUs to permanent MOUs, whether to include maintenance and refurbishment schedules (for specified period) in updated Social Agreements	On-going . Target completion July for Sinoe yet to be realized, to allow further time for community consultaion of their diaspora. Realistic target Mar 2020. Target for Grand Kru adjusted to Mar 2020, to allow for mobility, and adequate community consultation.	On-going . Target completion July for Sinoe yet to be realized, to allow further time for community consultaion of their diaspora. Realistic target Mar 2020. Target for Grand Kru adjusted to Mar 2020, to allow for mobility, and adequate community consultation.
					C.1.2.1.1	Butaw	Already Permanent. Annual review each end of year.	Already Permanent. Annual review each end of year.
					C.1.2.1.2	Tarjuowon	Already Permanent. Annual review each end of year.	Already Permanent. Annual review each end of year.
					C.1.2.1.3	Others	Yet to commence. Adjusted target Marc 2020.	Yet to commence. Adjusted target Mar 2020.
					C.1.2.2	Define a company standard (quality, type, budget, ...) for each type of infrastructure to be constructed or rehabilitated	Done.	Done.
					C.1.2.3	Prepare the budget needed to fill the implementation gaps as per the agreed timeframe of each MOUs signed	Done.	Done.
					C.1.2.4	Improve joint monitoring (GVL and communities) of MoU implementation and release an annual report	On-going. Report target Dec 2019. may be delayed by mobility constarints (roads).	Completed. Reports under review with communities and NBC.
					C.1.2.5	Clarify to the communities the following concept: areas developed/planted, areas developed non planted (infrastructure, conservation, etc.) areas non developed non planted (conservation areas) and the implication on communities benefits (CDF, employment, taxes, etc.)	On-going	On-going
	C.1.2.6	Review development maps (from the base maps including the version shared with local communities) and conduct the reconciliation process	On-going. Target Dec 2020 to account for mobility constraints.	On-going. Target re-adjusted to Apr 2020.				
	C.2	Responsible handling of conflict and grievances, and resolution of conflict	C.2.1	Improve the system to ensure that complaints or grievances including land claims are addressed or resolved in an effective, timely and appropriate manner (internal and external)	C.2.1.1	Socialize SOP on grievance and conflict handling and have a proper documentation and resolution process. Deeper training for social team including use of complaint management table and assign a team member per estate to be in charge of the complaint management table	On-going. Target Dec 2020 to account for mobility constraints.	On-going. Target Dec 2020 to account for mobility constraints.
C.2.1.2					Establish internal grievance committee including Operation & Sustainability	Done. On-going.	Done. On-going.	
C.2.1.3					Ensure that all documents related to grievance resolution are properly stored and access to the document	Done. On-going.	Done. On-going.	
C.2.1.4					Conduct monthly review and summary of grievances and complaint in each Estate and feed the Top Management dashboard to support decision making in term of improvement (stakeholder engagement, etc.)	On-going.	On-going.	
C.2.1.5					Create awareness to communities on GVL grievance management system	Started in May 2019. On-going.	Started in May 2019. On-going.	

C.3	Open and constructive engagement with local, national and international stakeholders	C.3.1	Stakeholder management system	C.3.1.1	Conduct stakeholders mapping and categorization (local communities and their respective diaspora, government, CSO, development organization, workers, etc. ) at: County level National level and International level Etc.	Done.	Done.
				C.3.1.2	Develop logbook of information requests and responses.	Commenced in June 2019. On-going.	Commenced in June 2019. On-going.
				C.3.1.3	Develop and maintain list of publicly available document and the stakeholders related to those information	Done.	Done.
				C.3.1.4	Set up the stakeholders platform per County of operation	Yet to commence	Yet to commence. In discussions with NBC
C4	Community development programmes	C.4.1	Implementation of CDF	C.4.1.1	Continue the channeling of funds as agreed to the community	On-going. Payments either completed or being updated.	On-going. Payments either completed or being updated.
				C.4.1.2	Establish detailed information on its progress on CDF, strategy and timeline to fulfill this commitment in its progress report. In addition, the company shall also inform the communities whether any program is postponed	On-going. Constrained by extremely poor mobility (roads).	On-going.
				C.4.1.3	Continue the brainstorming with IDH and keys stakeholder on the COPP	Process temporarily suspended pending further consultation with government, and review of alternative suitable model and financing mechanisms.	Process temporarily suspended pending further consultation with government, and review of alternative suitable model and financing mechanisms.
C5	Land tenure rights	C.5.1	Develop appropriate land tenure study guidelines to provide guidance on conducting land tenure study in order to understand the traditional land ownership system in a community and rules and	C.5.1.1	Improve Land Tenure Study according to RSPO guideline 2015	Yet to commence. Target date Jan 2020.	Yet to commence. Target date re-adjusted to Aug. 2020.
				C.5.1.2	Improving Participatory Mapping according to RSPO guideline 2015	On-going.	On-going.
				C.5.1.3	Raise awareness to the sustainability staff on the new land Act and the potential implication on the outreach	Yet to commence. Target date Jan 2020	Done.

D.1	Responsible Employment	D.1.1 Documented and transparent recruitment	D.1.1.1	Ensure the recruitment process prioritizing local community base on signed MoU	On-going. Routine process.	On-going. Routine process.
			D.1.1.2	Calculate the worker quota of every county can be recruited base on manpower requirement and potential MoU released	On-going. Routine process.	On-going. Routine process.
			D.1.1.3	Develop, disclose and implement a transparent recruitment procedure for skilled/specialized position and non skilled position	On-going. Process under review ad strengthening due to challenges within both company and communities.	On-going.
			D.1.1.4	Ensure full alignment with the Operation and Social team on areas planted prior to any communication to the communities for employment.	On-going.	On-going.
			D.1.1.5	Review and revise the recruitment mechanism in HR Manual and HR Recruitment Policy ensure there are the clauses set the recruitment or job training process proposely hired from the local community without any payment and transparent. also about job vacancy information to the town and city leader if required	On-going. Under improvement.	On-going. Under improvement.
			D.1.1.6	Set up the publication of the community recruitment to external stakeholder	Yet to commence. Target date Apr 2020.	Yet to commence. Target date Apr 2020.
			D.1.1.7	GVL support the local worker to have the ID	Yet to commence. Target date Apr 2020.	Yet to commence. Target date Apr 2020.
		D.1.2 Acquaint the employee to the company	D.1.2.1	Establish a policy or procedure for new employee/worker include socialization of regulacy, CBA, job description, contract, recruitment related to MoU, working hours, etc	On-going. Under reviews, as part of company restructuring.	On-going. Under reviews, as part of company restructuring.
			D.1.2.2	New Employee orientation: socialization of regulacy, CBA, job description, contract, recruitment related to MoU, working hours, etc	On-going.	On-going.
		D.1.3 Ensure provision of proper c	D.1.3.1	Identify the worker who have not signed a contract	Completed for existing employees.	Completed for existing employees.
			D.1.3.2	Make sure the worker keep the copy of the contract	Done.	Done.
			D.1.3.3	Consider the workers who do not speak english, and arrange the contract with their language	Done.	Done.
			D.1.3.4	Revise the contract format, and add on the other relevant information i.e. working hours, union membership and the membership fee	Revision done. Ammendments to be done following on-going CBA review and completion of organizational restructuring.	Revision done. Ammendments to be done following on-going CBA review and completion of organizational restructuring.
		D.1.4 Ensure proper salary administration and on time payment	D.1.4.1	The deduction of salary should have an agreement from the relevant workers. So, for current workers who have had a contract so company needs to arrange the power of attorney to company to deduct their salary for NASSCORP, union, etc	On-going.	On-going.
			D.1.4.2	Consider to implement the regulation that stated in the HR manual to review the basic salary annually	On-going.	On-going.
			D.1.4.3	Propose to initiate a living wage study for the workers	Yet to commence. Target date Aug 2020	Yet to commence. Target date Aug 2020
		D.1.5 Ensure compliance of workin	D.1.5.1	Conduct the SOP of finger printing	On-going. Target Dec 2020.	On-going. Target Dec 2020.
			D.1.5.2	Conduct the procedure/policy of break time of worker that need to stand by i.e. security, machine operator in mill, etc	On-going. Part of on-going CBA review and company restructuring.	On-going. Part of on-going CBA review and company restructuring.
			D.1.5.3	Working hour procedure in CBA needs to adjust to the regulation stated in HR and Employment reference Manual	On-going. Part of on-going CBA review and company restructuring.	On-going. Part of on-going CBA review and company restructuring.
			D.1.5.4	Procedure to conduct the over time working (overtime agreement letter, detail payment)	On-going. Part of on-going CBA review and company restructuring.	On-going. Part of on-going CBA review and company restructuring.
			D.1.5.5	Manage the working and overtime hour for FFB driver at the certain condition. i.e ffb truck driver stuck due to bad road condition	On-going. Part of on-going CBA review and company restructuring.	On-going. Part of on-going CBA review and company restructuring.
		D.1.6 Implementation of Child Labor and forced labour policy	D.1.6.1	Ensure proper working permit for all expat staff	On-going. Updated for all relevant staff.	On-going. Updated for all relevant staff.
			D.1.6.2	Increase the socialization on No Child Labor and no forced labour through poster or directly in the morning muster	Already commenced. On-going	Already commenced. On-going
			D.1.6.3	Socialization to the community about No child labor	Already commenced. On-going	Already commenced. On-going
D.1.7 Provide education access for all children	D.1.7.1	Conduct the education need assessment to analyse the infrastructure requirement for education implementation in the farm. This is to ensure the which public government school that available and which public company's sponsored school needs to set up (Please see CBA page 12)	Commenced . An Education Support Program under implementation from 2019-20 academic year. Includes support to additional 22 public schools in operational areas. Adjustment currently under discussion for anticipated delays.	On-going . An Education Support Program under implementation from 2020-21 academic year. Includes support to additional 22 public schools in operational areas. Adjustment compensated for by payment of education allowance for eligible employees for 2019-2020 academic year		
	D.1.7.2	Engange CRC and relevant parties to arrange the planning for education facilities as promised in the CA	Commenced . Communities part of the Education Support Program under implementation from 2019-20 academic year. Includes support to additional 22 public schools in operational areas.	Commenced . Communities part of the Education Support Program under implementation from adjusted 2020-21 academic year. Includes support to additional 22 public schools in operational areas.		

			D.1.7.3	Engage the government (MOE) to set up "Free and Compulsory Early Childhood Education" base on national Liberia program 2017 in the farm for all of the children in the farm and the community within age 3 to 5 (Please see CBA page 12)	Commenced . MOU arrangement with MoE under the Education Support Program	Commenced . MOU arrangement with MoE under the Education Support Program
			D.1.7.4	Propose sufficient transportation to reach the school for worker children as well as community near the site	On-going. To be upgraded as part of the Education Support Program .	On-going. To be upgraded as part of the Education Support Program .
			D.1.7.5	Propose to build the company sponsored school base on the assesment	On-going	On-going
			D.1.7.6	Communicate to the national and internal stakeholder on education plan and progress in GVL	On-going	On-going
			D.1.7.7	GVL can propose the specific class for palm oil lesson to enhance the education of local people about palm oil so later the community might be join to GVL as employee	Yet to commence. Target Apr 2020	Yet to commence. Target Apr 2020
			D.1.7.8	Involve the GVL staff as the teacher in the school and LCC can set up the curriculum for that	Yet to commence. Target Apr 2020	Yet to commence. Target Apr 2020
		D.1.8	Develop the capacity building for all of the worker	D.1.8.1	Conduct HIV Aids, Ebola, and Malaria awareness training as requested in the CBA	On-going. To be intensified.
				D.1.8.2	Develop learning center committee (LCC) to handle the training	Yet to commence. Target date Oct 2019
		D.1.9	Establish system to prevent and handle sexual harrasment	D.1.9.1	Arrange the procedure to handle the sexual harrasment and persecution case	Yet to commence. Target date Aug 2020
				D.1.9.2	Form a gender committee	Yet to commence. Target date Aug 2020
				D.1.9.3	Socialization on sexual harrasment persecution and the way to report the case base on SOP made before	Yet to commence. Target date Aug 2020
D.2	Respect the right of association and collective bargaining	D.2.1	Ensure proper engagement with union	D.2.1.1	Evaluate about the membership of union. It suppose to be voluntary however the current situation indicate that all new worker are automatically become a member	Part of on-going CBA review and company restructuring.
				D.2.1.2	Engage the union to arrange the financial report of membership fee and report to the member	On-going.
				D.2.1.3	Arrange the program of capacity building for union organizer	Yet to commence. Subject to on-going CBA review and company restructuring.
				D.2.1.4	Set up in collaboration with worker's union a social clause which prioritize consultation and brainstorming with the management around issues	Part of on-going CBA review and company restructuring.
				D.2.1.5	Raise awareness/socialize workers and union on the corporate mindset and culture	Part of on-going CBA review and company restructuring.
D.3	Health and Safety	D.3.1	Conduct risk analysis of safety and health and implementing action plan	D.3.1.1	Conduct hazard identification and risk assessment of all part of workplace in the mill and estate. arrange the action plant to determine the control of the risk base on the risk management hierachy	Assessment on-going.
				D.3.1.2	Socialization the HIRADC to the worker	Yet to commence. Adjusted target Dec 2019.
				D.3.1.3	Put the first aid kit in the certain location base on identification (mill)	Done.
				D.3.1.4	Select the PIC for emergency coordination and train them for the accident emergency action (mill)	PIC identified. Training commenced. Target date Nov 2020.
				D.3.1.5	Arrange JSHC in every site that consist of management and worker/union	Not yet commenced with union
				D.3.1.6	Install more signboard and poster related to OSH implementation	On-going.
				D.3.1.7	Select the PIC for emergency condition and train them for the accident emergency action (farm)	PIC idenitified. Training on-going. Target Dec 2019.
				D.3.1.8	Socialize to the emergency handling to the high risk workeplace workers	Yet to commence. Target date Jan 2020
				D.3.1.9	Review annually the HIRADC base on the operational evaluation or accident happen during a year	Yet to commence. Target date Aug 2020
				D.3.1.10	Emergency socialization for all of the worker	Yet to commence. Target date Aug 2020
		D.3.2	OHS Training Programme	D.3.2.1	Arrange OSH training identification and training program	Commenced. Adjusted target Mar 2020.
				D.3.2.2	Arrange the timebound plan for training, socialization, simulation related to OSH	On-going
				D.3.2.3	Training ISO 45001or training from Ministry of Manpower to ensure the competency base on government qualification for OSH/Sust Dept	Yet to commence. Adjusted target Mar 2020 to account for company restructuring and mobility constraints.
		D.3.3	Provision of PPE and protection from chemical exposure	D.3.3.1	Provide safety equipment to handle emergency on the workplace related to chemical i.e emergency shower and eye washer in chemical warehouse, etc	On-going.
				D.3.3.2	Provide the sufficient PPEs for the sprayer	On-going.
				D.3.3.3	Provide the PPEs storage for the sprayer to avoid contamination in their house	On-going.



			D.3.3.4	Socialization on the chemical (pesticide and fertilizer) direct body contact to the worker as well as the community (suggest the community not to take and consume the palm fruit taken from the farm)	On-going.	On-going.
			D.3.3.5	Socialization not to use the waste bin for water storage	On-going.	On-going.
			D.3.3.5	Evaluate PPEs quality and consider other treatment to minimise risk	On-going.	On-going.
			D.3.3.6	Conduct the specific annual medical surveillance for workers	Yet to commence. Adjusted target Dec 2019	Yet to commence. Re-adjusted target Jun 2020
			D.3.3.7	Conduct the rotation of chemical sprayers to reduce chemical contamination of their body	Yet to commence. Adjusted target Dec 2019	On-going
			D.3.3.8	Provide sufficient warehouse to store the hazardous waste	Done.	Done.
			D.3.3.9	Engage with the licensed user to take out the hazardous waste	Procurement of vendor service on-going. Target Apr 2020	Procurement of vendor service on-going. Target Apr 2020
	D.3.4	Provision of accident insurance for all workers	D.3.4.1	Update the percentage of payment in the HR and Employment Manual with regards to NASSCORP membership	Done.	Done.
			D.3.4.2	Make sure the deduction have a power of attorney from the worker	On-going.	On-going.
			D.3.4.3	Engage the NASSCORP for the claiming process since there was a case that the claim payment for the worker who got the accident in 2015	On-going.	On-going.
	D.3.5	Provision of adequate housing and health facility for the workers and family	D.3.5.1	Educate the worker on the housing maintenance since commonly the community house is different to the house provided by company. It is include to the proper usage of toilet	Commenced. To intensify, with monitoring and evaluation in coming months. Target Apr 2020	Commenced. To intensify, with monitoring and evaluation in coming months. Target Apr 2020
			D.3.5.2	GVL to provide dedicated doctor in each of the central clinic and make schedule to visit other clinic in other site	On-going. Hiring almost complete for Grand Kru; target adjusted to Dec 2019. Since to commence Apr 2020.	On-going. Hiring almost complete for both Sinoe and Grand Kru; target re-adjusted to Jun 2020.