

Sustainability Action Plan
January 2021 Update

"The Sustainability Action Plan (SAP) aims to strengthen the company's sustainability processes and practices, implement RSPO Complaints Panel Directives and address identified issues. Implementation of the SAP officially commenced in September 2018 with the advisory support of Earthworm Foundation (EF).

Implementation continues with most process changes already made and documented in revised Standard Operating Procedures (SOPs). While fulfilment of MoU commitments to communities continue to progress, resolution of grievances with some communities, suspended in 2019 due to an RSPO directive to select an independent mediator, resumed in March 2020 with the first on-site engagement by ProForest. ProForest reported progress in the process of resolution and a follow-up site visit is scheduled for February this year."

		A.4.1.18	Establish policy on forced trafficked labor									Completed.
		A.4.1.19	Establish SOP for waste management that cover all of the waste produced by operational including domestic waste.									Completed.
		A.4.1.20	Establish policy to circumvent instigated violence to maintain peace and order									Completed.
		A.4.1.21	Establish SOP for third party FFB sourcing									Completed.
		A.4.1.22	Establish SOP for pollution and GHG emission mitigation or reduction									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.
			A.4.2.2	Establish a clear hand over procedure and induction for new personnel on sustainability								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.
			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.
			A.4.2.5	Evaluation of data and document management								On-going. Target adjusted to Feb 2021.
	A.4.3	Tracking of legal	A.4.3.1	Establish a list of legal requirement and the copy of laws and regulations								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 adjusted to Feb 2021.
			A.4.3.3	Conduct an assessment of compliance (internal audit) to ensure that all legal requirements are fulfilled								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
			A.4.4.2	Establish clear guidance on map production, verification, approval and sharing. Ensure that RSPO needs are followed.								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..
			A.4.5.2	Fulfilment of logistical needs								On-going. Partial fulfilment in 2020. To be completed in 2021 Annual Budget. Affected by cost-cutting measures in response to economic downturn, and COVID-19 restriction on procurement.

B		ENVIRONMENTAL MANAGEMENT															
B.1	No development of and conservation of HCV areas	B.1.1	Organize a training on the new HCS Approach especially on: oModule 2 – Social requirements (version 2.0 May 2017) oModule 3 – Integration of HCV HCS Forest and FPIC (version 2.0)	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available											Internal training re-adjusted indefinitely to 2021, due to travel restriction under COVID-19 . Exploring appropriate training opportunities in Africa.	
				B.1.1.2	Obtain approval from HCSA on the reports and maps											Commenced. EF field assessment completed in Q4 2020. Awaiting report, and subsequent 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											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)											Commenced. EF field assessment completed in Q4 2020. Awaiting report, and subsequent outcome of on-going consultation with HCSA.	
				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.	
		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											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.	
				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.	
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.											Completed.	
				B.3.1.2	Having well documented IPM implementation records including records of training to IPM workers											Completed.	
		B.3.2	Proper usage of POME for fertilizers	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.											Completed.	
				B.3.2.2	Tarjuwon North (TNRE) estate/TRJM needs to record how much the total POME application, replace broken flowmeter											Completed.	
				B.3.2.3	Building of additional POME pond											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 assessment of pollution and GHG emission resource from the entire operational aspect .											Completed.	
				B.4.1.2	Establish action plan to mitigate or reduce the pollution and GHG emission.											Completed.	
				B.4.1.3	Calculate the operational GHG emission using RSPO GHG calculator ver 3.1 and report it to RSPO.											Done. Iterative 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. Iterative 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. Licensing 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. Iterative process.	
				B.5.1.4	Have well documented waste management and disposal plan to avoid or reduce pollution.											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 to the hazardous warehouse must be consider to the amount of pesticide bin put from chemical warehouse.											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.											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 re-adjusted to Dec 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.											Draft completed. To be reviewed and finalized Mar 2021.	

SOCIAL AND COMMUNITY ENGAGEMENT										
C.1	FPIC Process	C.1.1	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						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 deferred until further notice, due to review of funding mechanism.
			C.1.1.3	Improve ESIA report by conducting 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. Entire environmental and social requirements to be reviewed/updated in 2021. Also to consider implication of HCSA directives to GVL of Jan 2021
			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. Subject to implementation of ESIA. Also to consider implication of HCSA directives to GVL of Jan 2021
		C.1.2	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 2019 for Sinoe yet to be realized, to accommodate further time required by community for consultation with their diaspora. Target completion depends on COVID-19 situation and responsiveness of communities in securing legal advise and making their input.
			C.1.2.1.1	Butaw						Already Permanent. Annual review each end of year.
			C.1.2.1.2	Tarjowon						Already Permanent. Annual review each end of year.
			C.1.2.1.3	Others						Yet to commence. Adjusted target subject to COVID-19 situation and responsiveness of communities in securing legal advise and making their input.
			C.1.2.2	Define a company standard (quality, type, budget, ...) for each type of infrastructure to be constructed or rehabilitated						Done.
			C.1.2.3	Prepare the budget needed to fill the implementation gaps as per the agreed timeframe of each MOUs signed						Done.
C.2	Responsible handling of conflict and grievances, and resolution of conflict	C.2.1	C.1.2.4	Improve joint monitoring (GVL and communities) of MoU implementation and release an annual report						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. Iterative.
			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. Some communities seeking third party support for verification of boundaries and acreages.
			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 adjusted to Q1 2021 to account for mobility constraints due to COVID-19 challenges.
			C.2.1.2	Establish internal grievance committee including Operation & Sustainability.						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.
			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.
			C.2.1.5	Create awareness to communities on GVL grievance management system						Started in May 2019. On-going (iterative).

	D.1.3	Ensure provision of proper contract	D.1.3.1	Identify the worker who have not signed a contract								Completed for existing employees.
			D.1.3.2	Make sure the worker keep the copy of the contract								Done.
			D.1.3.3	Consider the workers who do not speak english, and arrange the contract with their language								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 incorporated into completed CBA review; will be concluded when organizational restructuring is finalized.
	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.
			D.1.4.2	Consider to implement the regulation that stated in the HR manual to review the basic salary annually								On-going.
			D.1.4.3	Propose to initiate a living wage study for the workers								Yet to commence. Awaiting national DLW benchmarking, possibly with inputs/support from RSPO DLW initiative
	D.1.5	Ensure compliance of working time	D.1.5.1	Conduct the SOP of finger printing								Completed. Under testing.
			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 completed 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								complited, as core part of CBA review and company restructuring.
			D.1.5.4	Procedure to conduct the over time working (overtime agreement letter, detail payment).								complited, as core part of 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.								complited, as core part of 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.
			D.1.6.2	Increase the socialization on No Child Labor and no forced labour through poster or directly in the morning muster.								On-going (iterative).
			D.1.6.3	Socialization to the community about No child labor.								On-going (iterative).
	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)								Apart from on-going general education support to communities and employee dependents, Phase I of the 3-year Education Support Program commenced for 2020-21 academic year. Covers a combination of infrastructure and furnishing, Teaching and learning materials, and stipend support to volunteer teachers in 22 public schools in company operational areas. Phase II and III will be informed by performance of Phase I, and extended to other beneficiary schools in the company catchment area.
			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 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.
			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.
			D.1.7.5	Propose to build the company sponsored school base on the assesment.								On-going
			D.1.7.6	Communicate to the national and internal stakeholder on education plan and progress in GVL.								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. Under review as part of company's overall investment review.
			D.1.7.8	Involve the GVL staff as the teacher in the school and LCC can set up the curiculum for that.								Yet to commence. Under review as part of company's overall investment review.
	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. Now includes COVID-19 pandemic awareness and compliance
			D.1.8.2	Develop learning center committee (LCC) to handle the training								Done. Team to undergo training in Q1 2021.
	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 adjusted to Q1 2021.
			D.1.9.2	Form a gender committee								Yet to commence. Target adjusted to Q1 2021.
			D.1.9.3	Socialization on sexual harrasment persecution and the way to report the case based on SOP made before								Yet to commence. Target adjusted to Q1 2021.
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							Completed. Part of CBA review and on-going 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								On-going. To be completed in Q1 2021, after the completion of CBA review in Dec 2020, and on-going 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								Done, as part of CBA review in Dec 2020.
			D.2.1.5	Raise awareness/socialize workers and union on the corporate mindset and culture								Done, as part of CBA review in Dec 2020.

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 hierarchy									Done.
				D.3.1.2	Socialization the HIRADC to the worker									On-going. To be completed in Q1 2021, after the completion of CBA review in Dec 2020, and on-going company restructuring.
				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 completed in Dec 2020.
				D.3.1.5	Arrange JSHC in every site that consist of management and worker/union									On-going. Teams established and in operation.
				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 identified. Training completed in Dec 2020.
				D.3.1.8	Socialize to the emergency handling to the high risk workplace workers									Done. Periodic review on-going
				D.3.1.9	Review annually the HIRADC base on the operational evaluation or accident happen during a year									Done. Periodic review on-going
				D.3.1.10	Emergency socialization for all workers									Done. Periodic review on-going
		D.3.2	OHS Training Programme	D.3.2.1	Arrange OSH training identification and training program									On-going.
				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. Re-adjusted target Q2 2021 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.
				D.3.3.5	Socialization not to use the waste bin for water storage									On-going.
				D.3.3.5	Evaluate PPEs quality and consider other treatment to minimise risk									On-going.
				D.3.3.6	Conduct the specific annual medical surveillance for workers									On-going.
				D.3.3.7	Conduct the rotation of chemical sprayers to reduce chemical contamination of their body									On-going.
				D.3.3.8	Provide sufficient warehouse to store the hazardous waste									Done.
				D.3.3.9	Engage with the licensed user to take out the hazardous waste									Completed.
		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.
				D.3.4.2	Make sure the deduction have a power of attorney from the worker									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.
		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 include to the proper usage of toilet.									On-going.
				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 complete for Grand Kru; Sinoe postponed. Using VMOs in the interim. Target re-adjusted to Q1 2021.