

## **Sustainability Action Plan**

### **June 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). This update includes recommendations made by the HCSA Grievance Panel although these are still subject to discussions with HCSA.

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 for Tarjuowon with ProForest as the RSPO-appointed mediator. ProForest reported progress following the second on-site engagement in March 2021 with a communique signed by all parties. The RSPO recommended a facilitator for Butaw but this was rejected by complainant NGOs in February 2021”



		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 personnels 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.
	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 re-adjusted to Sep 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 fulfillment 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.

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) oModule 3 – Integration of HCV HCS Forest and FPIC (version 2.0 May 2018)	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. First EF field assessment completed in Q4 2020. In consultation with HCSA, the assessment has been extended to the rest of the concession area, which will commence in Jul 2021. This will inform outcome of on-going consultations 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. First EF field assessment completed in Q4 2020. In consultation with HCSA, the assessment has been extended to the rest of the concession area, which will commence in Jul 2021. This will include the ICLUP and remediation plans, and will inform outcome of on-going consultations 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.
B2	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.2.1.0.1	Conduct HCS assessments on all developed areas; construct land use change maps, establish cleared HCS and develop new baseline maps					As in B.1.1.2 above.
				B.2.1.0.2	Conduct HCV/HCS Assessments for MoU areas for planned development					
				B.2.1.0.3	Update HCV/HCS maps					
				B.2.1.0.4	Get community agreement and incorporate into MOU					
				B.2.1.1	Development of management and monitoring plan according to established HCV maps.					Subject to completion of HCV-HCS re-assessment.
				B.2.1.1.1	Development of forest restoration / remediation / conservation plan based on HCSA decision					
				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.2.1.2.1	Demarcation of buffer zones and no-go areas					
				B.2.1.3	Conduct field inspections conducted regularly to ensure implementation of mitigation plan					Inspection on-going. 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.



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																			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	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.																					On-going. Target completion depends on agreement of independent facilitator appointed by RSPD for community with recorded grievances, and on the response of communities in securing legal advise and making their input for others.			
					C.1.2.1.1	Butaw																					Already Permanent. Annual review each end of year.	
					C.1.2.1.2	Tarjuowon																						Already Permanent. Annual review each end of year.
					C.1.2.1.3	Others																						Yet to commence. Target completion still depends on the 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.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.		



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 mechanism in ownership transfer	C.5.1.1	Improve Land Tenure Study according to RSPO guideline 2015																Yet to commence. The feasibility of implementing to be reviewed.			
				C.5.1.2	Improving Participatory Mapping according to RSPO guideline 2015																			On-going. Routine process.
				C.5.1.3	Raise awareness to the sustainability staff on the new land Act and the potential implication on the outreach																			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.			
				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.	
				D.1.1.3	Develop, disclose and implement a transparent recruitment procedure for skilled/specialized position and non skilled position.																			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.
				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 proposedly 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 routine improvement.
				D.1.1.6	Set up the publication of the community recruitment to external stakeholders.																			Done.
				D.1.1.7	GVL support the local worker to have the ID.																			Completed.
		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 review, 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 (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 tcompleted 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																																				Completed 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).																																				Completed 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.																																				Completed 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)																																			Phase I of GES near completion. Planning on-going for commencement of Phase II for 2021/22 academic year.		
				D.1.7.2	Engage 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 assessment.																																				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 curriculum 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.		
				D.1.8.2	Develop learning center committee (LCC) to handle the training																																				Done. Team training on-going.	
		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 re-adjusted to Q3 2021.		
				D.1.9.2	Form a gender committee																																			Yet to commence. Target re-adjusted to Q3 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 re-adjusted to Q3 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 automaticly 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 organizers																																			
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 plan to determine the control of the risk base on the risk management hierarchy	■	■																													Done.		
				D.3.1.2	Socialization the HIRADC to the workers																																	On-going.
				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)																																	Completed.
				D.3.1.8	Socialize to the emergency handling to the high risk workeplace 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 (pestiside 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 percentration 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 is 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 completed for Grand Kru; Sinoe postponed. Using VMOs in the interim. Target re-adjusted to Q3 2021.		