

## **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"





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.
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.2.1.0.1	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.











