Sustainability Action Plan
December 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 with ProForest mediating for Tarjuowon. ProForest has completed its field engagements in March 2021 with a communique signed by all parties and report submitted to the RSPO. The RSPO Complaints Panel is deliberating on the report and GVL is waiting for instructions on next steps. The RSPO has also recommended a facilitator for Butaw but this was rejected by complainant NGOs in February 2021

No	Area		Activity		Sub-activity	6 months						12 months						18 months						Update 31st Dec 2021
						1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
A	**GOVERNANCE**																							
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.	A1.1.1	Review and finalization of organization structure																			Completed.
				A1.1.2	Establish role function, job description, and authority level																			Completed. Under implementation, with Quarterly KPI stetting
				A1.1.3	Resource audit and hiring of relevant people to fill in any gaps in the structure																			Completed.
				A1.1.4	Socialization and implementation of new organization structure																			On-going
				A.1.1.5	Evaluation of organization structure																			On-going
A.2	Coordination and Oversight	A.2.1	Establish regular meetings on sustainability issues	A.2.1.1	Establish regular meeting on mill/plantation level and regional level																			On-going.
				A.2.1.2	Establish sustainability steering committee and its regular meeting																			On-going.
		A.2.2	Establish sustainability related Key Performance Indicators	A.2.2.1	Establish clear KPIs for sustainability team																			Completed
				A.2.2.2	Establish additional sustainability related KPIs for non-sustainability teams																			On-going
				A.2.2.3	Evaluation of KPIs																			On-going
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																			On-going
				A.3.1.2	Implement and establish a training record																			On-going
A.4	Infrastructure and logistics	A.4.1	Establish relevant policies and SOPs	A.4.1.1	Establish SOP on stakeholder management																			Completed.
				A.4.1.2	Establish SOP and system to track legal requirement																			Completed. Under implementation
				A.4.1.3	Establish SOP for boundary demarcation and its maintenance																			Completed. To be trialed when on-going arrangemnts with Liberia Lands authority and other stakeholders are completed for boundary review.
				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																			Completed and being implemented.

				A.4.1.5	Establish SOP for participatory mapping for disputed areas																Draft completed. To be tested after resolution of Blogbo dispute. Second site visit by independent facilitator was carried in Mar 2021. Awaiting final facilitation report, and decision by RSPO.
				A.4.1.6	Establish SOPs for mill operations in appropriate languages																SOP done; language translation yet to commence.
				A.4.1.7	Establish SOP for monitoring of environmental management plan, implementation, and reporting																Completed.
				A.4.1.8	Establish SOP for HCV HCS Peat management and monitoring																Draft completed . Awaiting report from testing under EF assessment (extended beyond east Sinoe), to the rest of the concession areas in Q1 2022.
				A.4.1.9	Establish SOP and system for grievance handling for both external and internal stakeholders. Also add mediation step before legal option.																Completed. In use.
				A.4.1.10	Establish SOP to describe the process of information sharing and dissemination																Completed.
				A.4.1.11	Review the recently announced Human Rights Defender Protection protocol by the RSPO and develop policy on human rights																Draft completed. Under internal review.
				A.4.1.12	Review Greenbook SOP to be clearer on pest attack intensity and IPM																Completed.
				A.4.1.13	Revise Greenbook SOP section 6.5.3 on empty pesticide package disposal																Completed.
				A.4.1.14	Review recruitment policy to include a statement on no recruitment of workers under 18 years old																Completed.
				A.4.1.15	Review recruitment policy to include non discrimination based on sexual orientation, union membership, and political affiliation																Completed.
				A.4.1.16	Update policy of promotion to include non-discrimination promotion																Completed.
				A.4.1.17	Establish policy to ensure no harrasment or abuse in the work place and reproductive rights are protected																Completed.
				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.																	Draft completed. Under review
				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.																	Completed. 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 2022 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 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 suspended indefinitely, 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																On-going. Final EF field assessment scheduled for Q1 2022 (after earlier assessments in Sinoe East and GK concession araes). 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)																On-going. Final EF field assessment scheduled for Q1 2022 (after earlier assessments in Sinoe East and GK concession araes). This 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 indefinietly.
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																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 routine community and employee engagement.
				B.2.1.2.1	Demarcation of buffer zones and no-go areas																On-going
				B.2.1.3	Conduct field inspections conducted regularly to ensure implementation of mitigation plan																Inspection on-going. To be reviewed and consolidateed 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	Tarjuowon 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																Completed.

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 .																	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. 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.
				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 in 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 (Reduse, 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.																	On-going
				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. Review on-going.

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 defered 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 environmnrtal and social requirements subject to on-going discussions with HCSA and RSPO
				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.																	New ESIA yet to be undertaken. Entire environmnrtal and social requirements subject to on-going discussions with HCSA and RSPO
		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 RSPO for community with recorded grievances, and on the response of communities in securing legal advise and making their input for others. Review of all MOUs scheduled for 2022.
					C.1.2.1.1 Butaw																	Already Permanent. Review schduled for 2022.
					C.1.2.1.2 Tarjuowon																	Already Permanent. Review schduled for 2022.
					C.1.2.1.3 Others																	Review of all MOUs scheduled for 2022.
				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; to be sahred with NBC in Q1 2022.
				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	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.
				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).
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.
				C.3.1.2	Develop logbook of information requests and responses.																	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.
				C.3.1.4	Set up the stakeholders platform per County of operation																	Yet to commence. Discussions with NBC on-going. Ministry of Internal affairs (MIA) is also setting up a similar platform to contonue/complement that of 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
				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.
				C.4.1.3	Continue the brainstorming with IDH and keys stakeholder on the COPP																	Process temporarily suspended pending further consultation with government, and rewiew of alternative suitable model and financing mechanisms. GVL also exploring other options outside this on-going consultation.
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	C.5.1.1	Improve Land Tenure Study according to RSPO guideline 2015																	Yet to commence. The feasibility of implementation to be reviewed.
				C.5.1.2	Improiving 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 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 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 Employement refference 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 requierement for education implementation in the farm. This is to ensure the which public government school that available and which public company's spnsored school needs to set up (Please see CBA page 12)																	Phase II of GES on-going for 2021-2022 acadminc year.
				D.1.7.2	Engange CRC and relevant parties to arrange the planning for education facilities as promised in the CA																	On-going as part of the on-going Education Support Program under implementation from adjusted 2020-21 academic year. Increase of support from 22 schools in Phase I to to 38 public schools in Phase II in company's concession 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).																	On-going . MOU arrangement with MoE under the Education Support Program.
				D.1.7.4	Propose sufficient transportation to reach the school for worker children as weel 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 spesific 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.
				D.1.8.2	Develop learning center commiittee (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																	Commenced. Target completion Q1 2022.
				D.1.9.2	Form a gender commiittee																	Commenced. Target completion Q1 2022.
				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 valuntary 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																	On-going.
				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 hierachy																	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 2022 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 comsume 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 percentation 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 Q1 2022.