

Sustainability Action Plan
June 2022 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 some recommendations made by the HCSA Grievance Panel.

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 1 June 2022
				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	A.1.1.1	Review and finalization of organization structure																Completed.	
				A.1.1.2	Establish role function, job description, and authority level																Completed. Under implementation, with Quarterly KPI setting	
				A.1.1.3	Resource audit and hiring of relevant people to fill in any gaps in the structure																Completed.	
				A.1.1.4	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 arrangements with Liberia Land Authority (LLA) 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 after completion of EF assessment across concession areas (completed May 2022), which is under review	
				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.	

