Sustainability Action Plan
January 2023 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). Proposed permanent MoUs have been distributed to all communities.

While fulfilment of current 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. Currently awaiting further guidance from RSPO on this.

No	Area		Activity		Sub-activity	6 months						12 months						18 months						Update October 2022	Update January 2023
						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.	Completed.
				A1.1.2	Establish role function, job description, and authority level																			Completed. Under implementation, with Quarterly KPI stetting	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.	Completed.
				A1.1.4	Socialization and implementation of new organization structure																			On-going	On-going
				A.1.1.5	Evaluation of organization structure																			On-going	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.	On-going.
				A.2.1.2	Establish sustainability steering committee and its regular meeting																			On-going.	On-going.
		A.2.2	Establish sustainability related Key Performance Indicators	A.2.2.1	Establish clear KPIs for sustainability team																			Completed	Completed
				A.2.2.2	Establish additional sustainability related KPIs for non-sustainability teams																			On-going	On-going
				A.2.2.3	Evaluation of KPIs																			On-going	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	On-going
				A.3.1.2	Implement and establish a training record																			On-going	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.	Completed.
				A.4.1.2	Establish SOP and system to track legal requirement																			Completed. Under implementation	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 Land Authority (LLA) and other stakeholders are completed for boundary review.	Completed. To be trialed when on-going arrangemnts 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.	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.	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																			Completed; decision to do in English only, as the official language of Liberia	Completed; decision to do in English only, as the official language of Liberia
				A.4.1.7	Establish SOP for monitoring of environmental management plan, implementation, and reporting																			Completed.	Completed.
				A.4.1.8	Establish SOP for HCV HCS Peat management and monitoring																			Draft completed . Review of EF assessment report submitted, and currently guiding the implementtation of the Draft SOP.	Draft completed . Review of EF assessment report submitted, and currently guiding the implementtation of the Draft SOP.
				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.	Completed. In use.
				A.4.1.10	Establish SOP to describe the process of information sharing and dissemination																			Completed.	Completed.
				A.4.1.11	Review the recently announced Human Rights Defender Protection protocol by the RSPO and develop policy on human rights																			Completed	Completed
				A.4.1.12	Review Greenbook SOP to be clearer on pest attack intensity and IPM																			Completed.	Completed.
				A.4.1.13	Revise Greenbook SOP section 6.5.3 on empty pesticide package disposal																			Completed.	Completed.
				A.4.1.14	Review recruitment policy to include a statement on no recruitment of workers under 18 years old																			Completed.	Completed.
				A.4.1.15	Review recruitment policy to include non discrimination based on sexual orientation, union membership, and political affiliation																			Completed.	Completed.
				A.4.1.16	Update policy of promotion to include non-discrimination promotion																			Completed.	Completed.
				A.4.1.17	Establish policy to ensure no harrasment or abuse in the work place and reproductive rights are protected																			Completed.	Completed.
				A.4.1.18	Establish policy on forced trafficked labor																			Completed.	Completed.
				A.4.1.19	Establish SOP for waste management that cover all of the waste produced by operational including domestic waste.																			Completed.	Completed.
				A.4.1.20	Establish policy to circumvent instigated violence to maintain peace and order																			Completed.	Completed.
				A.4.1.21	Establish SOP for third party FFB sourcing																			Completed.	Completed.
				A.4.1.22	Establish SOP for pollution and GHG emission mitigation or reduction																			Completed.	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.	Completed. In operation.
				A.4.2.2	Establish a clear hand over procedure and induction for new personnels on sustainability																			Completed.	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.	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.	Done. In operation.
				A.4.2.5	Evaluation of data and document management																			On-going.	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.	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	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.	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	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	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. .	Done. .
				A.4.5.2	Fulfilment of logistical needs																		On-going. Improved in allocations under 2022 Annual Budget. Still affected by cost-cutting measures in response to global economic downturn.	On-going. Improved in allocations under 2022 Annual Budget. Still affected by cost-cutting measures in response to global economic downturn.
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	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available																		Exploring appropriate training opportunities in Africa.	Exploring appropriate training opportunities in Africa.
				B.1.1.2	Obtain approval from HCSA on the reports and maps																		Preparing for submission to HCSA.	Reviewing pending grievance case developments
		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.	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)																		Report completed. Action plan developed for mitigation, and under implementation.	Report completed and submitted to HCSA. Action plan developed for mitigation, and under implementation.
				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.	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.	As in B.1.2.2 above.
				B.2.1.0.2	Conduct HCV/HCS Assessments for MoU areas for planned development																		As in B.1.1.2 above.	As in B.1.2.2 above.
				B.2.1.0.3	Update HCV/HCS maps																		As in B.1.1.2 above.	As in B.1.2.2 above.
				B.2.1.0.4	Get community agreement and incorporate into MOU																		As in B.1.1.2 above.	As in B.1.2.2 above.
				B.2.1.1	Development of management and monitoring plan according to established HCV maps.																		As in B.1.1.2 above.	As in B.1.2.2 above.
				B.2.1.1.1	Development of forest restoration / remediation / conservation plan based on HCSA decision																		As in B.1.1.2 above.	As in B.1.2.2 above.
				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.	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	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 final report of HCV-HCS re-assessment, and submission of mitigation plan.	Inspection on-going. To be reviewed and consolidateed subject to final report of HCV-HCS re-assessment, and submission of mitigation plan.
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.	Completed.
				B.3.1.2	Having well documented IPM implementation records including records of training to IPM workers																		Completed.	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.	Completed.
				B.3.2.2	Tarjuowon North (TNRE) estate/TRJM needs to record how much the total POME application, replace broken flowmeter																		Completed.	Completed.
				B.3.2.3	Building of additional POME pond																		Completed.	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.	Completed.
				B.4.1.2	Establish action plan to mitigate or reduce the pollution and GHG emission.																		Completed.	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.	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.	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.	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.	Done. Iterrative process.
				B.5.1.4	Have well documented waste management and disposal plan to avoid or reduce pollution.																		Completed.	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.	On-going. Iterative.
				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.	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	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.	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.	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.	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																		Entire environmental and social requirements subject to on-going discussions with HCSA and RSPO	Entire environmental and social requirements subject to on-going discussions with 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.																		Entire environmental and social requirements subject to on-going discussions with HCSA and RSPO	Entire environmental and social requirements subject to on-going discussions with 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 on-going.	Proposed permanent MOUs sent to all communities for review in November 2022 . Target completion depends on agreement of independent facilitator appointed by RSPO for community with recorded grievances, and / or the response of communities in securing legal advise and making their input for others.
					C.1.2.1.1 Butaw																		Already Permanent. Review process on-going.	Already Permanent. Review process on-going.
					C.1.2.1.2 Tarjuowon																		Already Permanent. Review process on-going.	Already Permanent. Review process on-going.
					C.1.2.1.3 Others																		Already Permanent. Review process on-going.	Already Permanent. Review process on-going.
				C.1.2.2	Define a company standard (quality, type, budget, …) for each type of infrastructure to be constructed or rehabilitated																		Done.	Done.
				C.1.2.3	Prepare the budget needed to fill the implementation gaps as per the agreed timeframe of each MOUs signed																		Done.	Done.
				C.1.2.4	Improve joint monitoring (GVL and communities) of MoU implementation and release an annual report																		Completed.	Completed.
				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.	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																		Part of the on-going MOU Review. Some communities seeking third party support for verification of boundaries and acreages.	Part of the on-going MOU Review. 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.	On-going.
				C.2.1.2	Establish internal grievance committee including Operation & Sustainability.																		Done. On-going.	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.	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.	On-going.
				C.2.1.5	Create awareness to communities on GVL grievance management system																		Started in May 2019. On-going (iterative).	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.	Done.
				C.3.1.2	Develop logbook of information requests and responses.																		Commenced in June 2019. On-going.	On-going. Iterative.
				C.3.1.3	Develop and maintain list of publicly available document and the stakeholders related to those information																		Done.	Done.
				C.3.1.4	Set up the stakeholders platform per County of operation																		To be rationalised. Discussions with NBC on-going. Ministry of Internal Affairs (MIA) is also setting up a similar platform to contonue/complement that of NBC. HCSA Remediation Plan also requires setting up of Multi-Stakeholder Platform, and is currently under development.	To be rationalised. Discussions with NBC on-going. Ministry of Internal Affairs (MIA) is also setting up a similar platform to contonue/complement that of NBC. HCSA Remediation Plan also requires setting up of Multi-Stakeholder Platform, and is currently under development.
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	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.	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 review of alternative suitable model and financing mechanisms. GVL also exploring other options outside this on-going consultation.	Process temporarily suspended pending further consultation with government, and review 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	C.5.1.1	Improve Land Tenure Study according to RSPO guideline 2015																	Yet to commence. The feasibility of implementation to be reviewed.	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.	On-going. Iterative.
				C.5.1.3	Raise awareness to the sustainability staff on the new land Act and the potential implication on the outreach																	Done.	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.	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.	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.	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.	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.	On-going. Under routine improvement.
				D.1.1.6	Set up the publication of the community recruitment to external stakeholders.																	Done.	Done.
				D.1.1.7	GVL support the local worker to have the ID.																	Completed.	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.	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).	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.	Completed for existing employees.
				D.1.3.2	Make sure the worker keep the copy of the contract																	Done.	Done.
				D.1.3.3	Consider the workers who do not speak english, and arrange the contract with their language																	Done.	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.	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.	On-going. Iterative.
				D.1.4.2	Consider to implement the regulation that stated in the HR manual to review the basic salary annually																	On-going.	On-going. Iterative.
				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	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. On-going.	Completed. On-going.
				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.	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																	On-going. Part of completed CBA review and company restructuring.	On-going. Part of completed CBA review and company restructuring.
				D.1.5.4	Procedure to conduct the over time working (overtime agreement letter, detail payment).																	On-going. Part of completed CBA review and company restructuring.	On-going. Part of completed 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.																	On-going. Part of completed CBA review and company restructuring.	On-going. Part of completed 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.	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).	On-going (iterative).
				D.1.6.3	Socialization to the community about No child labor.																	On-going (iterative).	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 III of the GVL Education Support (GES) Program is on-going for 2022-2023 acadminc year.	Phase III of the GVL Education Support (GES) Program is on-going for 2022-2023 acadminc year. Assessment of prospective bebeficiary schools for Phase IV commenced. To be completed before 20203-2024 acadmic year begins.
				D.1.7.2	Engange CRC and relevant parties to arrange the planning for education facilities as promised in the CA																	Process improved under the implementation of the current Phase III for the 2022-2023 academic year. Beneficiary schools increased to 60, up from 38 schools in Phase II and 22 public schools in Phase I.	Process improved under the implementation of the current Phase III for the 2022-2023 academic year. Beneficiary schools increased to 60, up from 38 schools in Phase II and 22 public schools in Phase I.
				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 made with MoE under the Education Support Program.	On-going . MOU arrangement made 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 .	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	On-going
				D.1.7.6	Communicate to the national and internal stakeholder on education plan and progress in GVL.																	On-going	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.	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.	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.	On-going.
				D.1.8.2	Develop learning center commiittee (LCC) to handle the training																	Done. Team training on-going.	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 cases																		Commenced. Target completion defered to Q4 2022 as part of major HR reforms.	Done. Continuos awareness and training on-going.
				D.1.9.2	Form a gender commiittee																		Commenced. Target completion defered to Q4 2022 as part of major HR reforms.	Commenced. Target completion defered to Q1 2023 as part of major HR reforms.
				D.1.9.3	Socialization on sexual harrasment persecution and the way to report the case based on SOP made before																		Commenced. Target completion defered to Q4 2022 as part of major HR reforms.	Commenced. Target completion defered to Q4 2022 as part of major HR reforms.
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 workers automaticly become members																		Completed. Part of CBA review and on-going company restructuring.	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.	On-going.
				D.2.1.3	Arrange the program of capacity building for union organizers																		On-going.	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.	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.	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.	Done.
				D.3.1.2	Socialization the HIRADC to the workers																		On-going.	On-going.
				D.3.1.3	Put the first aid kit in the certain location base on identification (mill)																		Done.	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.	Done
				D.3.1.5	Arrange JSHC in every site that consist of management and worker/union																		On-going. Teams established and in operation.	Done
				D.3.1.6	Install more signboard and poster related to OSH implementation																		On-going.	On-going.
				D.3.1.7	Select the PIC for emergency condition and train them for the accident emergency action (farm)																		Completed.	Completed.
				D.3.1.8	Socialize to the emergency handling to the high risk workeplace workers																		Done. Periodic review on-going	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	Done. Periodic review on-going
				D.3.1.10	Emergency socialization for all workers																		Done. Periodic review on-going	Done. Periodic review on-going
		D.3.2	OHS Training Programme	D.3.2.1	Arrange OSH training identification and training program																		On-going.	On-going.
				D.3.2.2	Arrange the timebound plan for training, socialization, simulation related to OSH																		On-going.	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 Q4 2022 to account for company restructuring and mobility constraints.	Yet to commence. Re-adjusted target agaain to Q1 2023 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.	On-going.
				D.3.3.2	Provide the sufficient PPEs for the sprayer																		On-going.	On-going.
				D.3.3.3	Provide the PPEs storage for the sprayer to avoid contamination in their house																		On-going.	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.	On-going.
				D.3.3.5	Socialization not to use the waste bin for water storage																		On-going.	On-going.
				D.3.3.5	Evaluate PPEs quality and consider other treatment to minimise risk																		On-going.	On-going.
				D.3.3.6	Conduct the specific annual medical surveillance for workers																		On-going.	On-going.
				D.3.3.7	Conduct the rotation of chemical sprayers to reduce chemical contamination of their body																		On-going	On-going
				D.3.3.8	Provide sufficient warehouse to store the hazardous waste																		Done.	Done.
				D.3.3.9	Engage with the licensed user to take out the hazardous waste																		Completed.	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.	Done.
				D.3.4.2	Make sure the deduction have a power of attorney from the worker																		On-going.	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.	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.	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.																		Process re-organized in consultation with MOH to operate a VMO in Sinoe and GK, and refer serious cases to nearby Hospitals.	Process re-organized in consultation with MOH to operate a VMO in Sinoe and GK, and refer serious cases to nearby Hospitals.