## Sustainability Action Plan March 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					6 months			12 mont			18 mont		Update January 2023	Update Mar 2023
INU	1		Activity	Sub-activity Sub-activity	1 2	3 4 5	6 7				13 1	15 16			
	GOVERNANCE														
A.1	Structure	A.1.1	Review and strengthen	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 KP	Completed
			the sustainability team and GIS	Add 2 December 19 and 1				_		++	-		+	stetting	Constituted.
			team) to allow clear role and	A1.1.3 Resource audit and hiring of relevant people to fill in any gaps in the structure									+	Completed.	Completed.
			collaboration between teams.	A1.1.4 Socialization and implementation of new organization structure			-		+		-			On-going	On-going
۸.2	Coordination and Oversight	A.2.1	Establish regular meetings on	A.1.1.5 Evaluation of organization structure  A.2.1.1 Establish regular meeting on mill/plantation level and regional level										On-going On-going.	On-going On-going.
M.2	Loordination and Oversight	A.Z.1	sustainability issues	A.2.1.2 Establish sustainability steering committee and its regular meeting							+		+	On-going.	On-going.
		Δ22	Establish sustainability related	A.2.2.1 Establish clear KPIs for sustainability team										Completed	Completed
		71.2.2	Key Performance Indicators	A.2.2.2 Establish additional sustainability related KPIs for non-sustainability teams										On-going	On-going On-going
			ney retrormance maleators	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										On-going	On-going On-going
				A 2.1.2 Implement and establish a training record									+ +	On-going	On going
.4	nfrastructure and logistics	A.4.1	Establish relevant policies and	A.3.1.2 Implement and establish a training record A.4.1.1 Establish SOP on stakeholder management										Completed.	On-going Completed.
	illiasti detale alla logistics	A.4.1	SOPs	A.4.1.2 Establish SOP and system to track legal requirement										Completed. Under implementation	Completed. Under implementation
			3013	A.4.1.3 Establish SOP for boundary demarcation and its maintenance										Completed. To be trialed when on-going arrangemnts	
				A-4.13 Sabinar 301 for boundary verification and its manner mance										with Liberia Land Authority (LLA) and other stakeholders are completed for boundary review.	boundary remapping exercise
				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.	Completed. To be trialed in Tarjuowon in clan boundary remapping exercise
				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, a reporting	nd									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 implementiation of the Draft SOP.	Draft completed. Being reviewed for approval
				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 R and develop policy on human rights	SPO									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 unde years old	r 18									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 operati including domestic waste.	onal									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:  - soli 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.	ш			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.

R	ENVIRONMENTAL MANAGEMENT									
B.1	No development of and		Organize a training on the new	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available		$\overline{}$		Exploring appropriate training opportunities in Africa.	Secondment of GAR expert to do in-house traiing
	conservation of HCS areas		HCS Approach especially on:		Obtain approval from HCSA on the reports and maps				Reviewing pending grievance case developments	planned To follow RSPO process, given GAR withdrawal from
			(version 2.0 May 2017) Review the previous HCS work (Grand Kru & Sinoe) in alignment							HCSA
		В.1.2			Review all HCS work (Grand Kru and Sinoe) and produce new updated HCS reports and maps to be submitted to HCSA				Done.	Done.
			with the new HCS Approach	B.1.2.2	Ground check of HCS clearance claim and develop remediation action. Develop and				Report completed and submitted to HCSA. Action plan	ProForest developing HCS remediation plan.
			toolkit (integration of the community livelihoods		implement the ICLUP (Integrated Conservation and Land Use Planning)				developed for mitigation, and under implementation.	
			programme (COPP perspective	D 1 2 2	Define a prospective land acquisition plan for all the new development (Example:				Vot to commonce Subject to further consideration on	Yet to commence. Subject to further consideration on
			and alternative livelihoods)	B.1.2.3	Barclayville, Juazon, etc.)				the proposed new areas. Expansion drive suspended indefinietly.	the proposed new areas. Expansion drive suspended indefinietly.
B2	No development of and	B 2 1	Develop management and	B 2 1 0	Conduct HCS assessments on all developed areas; construct land use change maps,			++++	 As in B.1.2.2 above.	HCS assessments completed for existing MOU areas.
52	conservation of HCV areas	5.2.1	monitoring plan as well as implementation for protecting	1	establish cleared HCS and develop new baseline maps				A3 III D.1.2.2 above.	HCS/HCV management / monitoring SOP being reviewed
			the HCV area.	B.2.1.0.	Conduct HCV/HCS Assessments for MoU areas for planned development				As in B.1.2.2 above.	As above
				B.2.1.0.	Update HCV/HCS maps				As in B.1.2.2 above.	As above
				B.2.1.0.	Get community agreement and incorporate into MOU				As in B.1.2.2 above.	As above
				4					As in B.1.2.2 above.	and a second
				B.2.1.1	Development of management and monitoring plan according to established HCV maps.				AS IN B.1.2.2 above.	As above
				B.2.1.1. 1	Development of forest restoration / remediation / conservation plan based on HCSA decision				As in B.1.2.2 above.	As above
				B.2.1.2	Conduct socialization to Operations, workers and community to increase awareness and				On-going as part of routine community and employee	On-going as part of routine community and employee
					protection of HCV and HCS areas				engagement.	engagement.
				B.2.1.2.	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				Inspection on-going. To be reviewed and consolidatee	d Inspection on-going.
					plan				subject to final report of HCV-HCS re-assessment, and submission of mitigation plan.	
B.3	Yield improvement without	B.3.1	Establishment of integrated pest	B.3.1.1	Establishment of IPM Plan, which contain identification of potential pests and				Completed.	Completed.
	intensification of use of chemical		management		thresholds, technic use to control (cultural, biological, mechanical and physical methods)					·
	pesticides and fertilizers				pest attacking, identify and plant native species used as part of biological control method refer to SOP and Concession Agreement.					
				B.3.1.2	refer to SUP and Concession Agreement.  Having well documented IPM implementation records including records of training to IPM workers				Completed.	Completed.
		B.3.2	Proper usage of POME for	B.3.2.1	Conduct study of the optimum area for POME application for effluent mill with capacity				Completed.	Completed.
			fertilizers	B.3.2.2	40 mt FFB/hour and for new pond capacity.  Tarjuowon North (TNRE) estate/TRJM needs to record how much the total POME				Completed.	Completed.
					application, replace broken flowmeter					
					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				Done. Iterrative process.	Done. Iterrative process.
				B.5.1.4	Procedure, EMPL and best practices.  Have well documented waste management and disposal plan to avoid or reduce				Completed.	Completed.
				R 5 1 5	pollution.  Arrange logbook for hazardous warehouse. Some of the amount must refer to the				On-going. Iterative.	On-going. Iterative.
				0.3.1.5	logbook of general warehouse. For example amount of ex-pesticide bin in to the				on-going, iterative.	on-going, iterative.
					hazardous warehouse must be consider to the amount of pesticide bin put from					
				D F 1 C	chemical warehouse.			++++	 Completed	Completed
					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		Improve efficiency of the use of fossil fuel and optimization of renewable energy.	$\bot$			On-going On-going	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				Draft completed. Review on-going.	Draft completed. Review on-going.
					and electricity use in operations.					
	I						 			

C.1 FPIC Pro	L AND COMMUNITY ENGAGI rocess		Review all FPIC process to fulfill any process and documentation	C.1.1.1	Review and update the FPIC documentation process in alignment with the SOP that will				
								Completed.	Completed.
			gaps		be updated. This include improvement of scoping process and identification of community's self chosen representatives				
				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,	In collaboration with Liberia Lands Authority (LLA). Implementation target deferred until further notice,
					v ,			due to review of funding mechanism.	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			Entire environmental and social requirements subject to on-going discussions with RSPO	Entire environmental and social requirements subject to on-going discussions with RSPO
					monitoring of impacts			to on-going discussions with KSPO	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 RSPO	Entire environmental and social requirements subject to on-going discussions with RSPO
					implementation and monitoring according to the SIA report.			to on-going discussions with RSPO	
			Review all MOUs to fulfill any process, documentation gaps	C.1.2.1	Converting provisional MOUs to permanent MOUs, whether to include maintenance and refurbishment schedules (for specified period) in updated Social Agreements.			Proposed permanent MOUs sent to all communities for review in November 2022 . Target completion	Proposed permanent MOUs sent to all communities for review in November 2022 . Target completion
			and the implementation level of		returbishment scriedales (for specified period) in appared social Agreements.			depends on agreement of independent facilitator	depends on agreement of independent facilitator
			each MOUs signed					appointed by RSPO for community with recorded	appointed by RSPO for community with recorded
								grievances, and / or the response of communities in securing legal advise and making their input for others	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.1.2.1.1 Butaw C.1.2.1.2 Tariuowon			Already Permanent. Review process on-going.  Already Permanent. Review process on-going.	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 no 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.2.1.1	Socialize SOP on grievance and conflict handling and have a proper documentation and			On-going.	On-going.
and grie conflict	ievances, and resolution of t		that complaints or grievances including land claims are addressed or resolved in an effective, timely and appropriate		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				
			manner (internal and external)	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.
	J							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						Done.	Done.
				6242	International level Etc.							
					Develop logbook of information requests and responses.  Develop and maintain list of publicly available document and the stakeholders related to those information						On-going. Iterative.  Done.	On-going. Iterative. 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	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	C.4.1	Implementation of CDF	C.4.1.1	Continue the channeling of funds as agreed to the community						On-going	On-going
	programmes				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.	GVL also exploring other options as part of Tarjuowon facilitated discussions.
C5	Land tenure rights	C.5.1	Develop appropriate land tenure study guidelines to	C.5.1.1	Improve Land Tenure Study according to RSPO guideline 2015						Yet to commence. The feasibility of implementation to be reviewed.	Part of MOU discussions
					Improiving Participatory Mapping according to RSPO guideline 2015						On-going. Iterative.	On-going. Iterative.
			land tenure study in order to understand the traditional land ownership system in a	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		Ensure the recruitment process prioritizing local community base on signed MoU.						On-going. Routine process.	On-going. Routine process.
			recruitment	D.1.1.2	Calculate the worker quota of every county can be recruited base on manpower requirement and potential MoU released.	Ш					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.
					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.
					Set up the publication of the community recruitment to external stakeholders.  GVL support the local worker to have the ID.		_				Done. Completed.	Done. Completed.
			Acquaint the employee to the company		SVE Support till encla worker til mere tile til.  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.
				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			Identify the worker who have not signed a contract						Completed for existing employees.	Completed for existing employees.
					Make sure the worker keep the copy of the contract	+		-	+	$\bot$	Done.	Done.
					Consider the workers who do not speak english, and arrange the contract with their language						Done.	Done.
					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
			administration and on time payment		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. Iterative.	On-going. Iterative.
				D.1.4.2	Consider to implement the regulation that stated in the HR manual to review the basic salary annually			ЦΠ		$\perp \!\!\! \perp \!\!\! \perp$	On-going. Iterative.	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	D.1.5.1	Conduct the SOP of finger printing			Completed. On-going.	Completed. On-going.
		time		Conduct the procedure/policy of break time of worker that need to stand by i.e, security,			On-going. Part of completed CBA review and company	
				machine operator in mill, etc			restructuring.	0.0
			D.1.5.3	Working hour procedure in CBA needs to adjust to the regulation stated in HR and			On-going. Part of completed CBA review and company	On-going
				Employement refference Manual			restructuring.	0.0
			D.1.5.4	Procedure to conduct the over time working (overtime agreement letter, detail			On-going. Part of completed CBA review and company	On-going
				payment).			restructuring.	0.0
			D.1.5.5	Manage the working and overtime hour for FFB driver at the certain condition. i.e ffb			On-going. Part of completed CBA review and company	On-going
				truck driver stuck due to bad road condition.			restructuring.	88
	D 1.6	Implementation of Child Labor	D 1 6 1	Ensure proper working permit for all expat staff			On-going. Updated for all relevant staff.	On-going
	D.1.0	and forced labour policy		Increase the socialization on No Child Labor and no forced labour through poster or			On-going (iterative).	On-going (iterative).
		and forced labour policy	D.1.0.2	directly in the morning muster.			on-going (iterative).	on-going (iterative).
			D 1 6 2	Socialization to the community about No child labor.			On-going (iterative).	On-going (iterative).
	D 1 7	Provide education access for all		Conduct the education need assessment to analyse the infrastructure requierement for				Phase III of the GVL Education Support (GES) Program
	D.1.7	children	D.1.7.1	education implementation in the farm. This is to ensure the which public government			is on-going for 2022-2023 acadminc year.	is on-going for 2022-2023 acadminc year.
		children					is on-going for 2022-2023 acadmine year.	is on-going for 2022-2023 acadmine year.
				school that available and which public company's spnsored school needs to set up				
				(Please see CBA page 12)			Assessment of prospective bebeficiary schools for	Assessment of prospective bebeficiary schools for
							Phase IV commenced. To be completed before 20203-	Phase IV ongoing.
				2 Company of the control of the cont			2024 acadmic year begins.	
				Engange CRC and relevant parties to arrange the planning for education facilities as			Process improved under the implementation of the	Process improved under the implementation of the
				promised in the CA			current Phase III for the 2022-2023 academic year.	current Phase III for the 2022-2023 academic year.
							Beneficiary schools increased to 60, up from 38	Beneficiary schools increased to 60, up from 38
							schools in Phase II and 22 public schools in Phase I.	schools in Phase II and 22 public schools in Phase I.
			D 1 7 2	Faces the assessment (MOF) to est up "Face and Commuters Facts Childhead			On-going . MOU arrangement made with MoE under	On-going . MOU arrangement made with MoE under
			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 Education Support Program.	the Education Support Program.
				the farm and the community within age 3 to 5 (Please see CBA page 12).				
			D.1.7.4	Propose sufficient transportation to reach the school for worker children as weel as			On-going. To be upgraded as part of the Education	On-going. To be upgraded as part of the Education
				community near the site.			Support Program .	Support Program .
			D.1.7.5	Propose to build the company sponsored school base on the assesment.			On-going On-going	On-going On-going
			D.1.7.6	Communicate to the national and internal stakeholder on education plan and progress in GVI.			On-going On-going	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.
				people about pain on so later the community might be join to GVE as employee.			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			Yet to commence. Under review as part of company's	Yet to commence.
				that.			overall investment review.	
	D.1.8	Develop the capacity building for	D.1.8.1	Conduct HIV AIDS, Ebola, and Malaria awareness training as requested in the CBA			On-going.	On-going.
		all of the worker	D.1.8.2	Develop learning center committee (LCC) to handle the training			Done. Team training on-going.	Done. Team training on-going.
	D.1.9	Establish system to prevent and	D.1.9.1	Arrange the procedure to handle the sexual harrasment and persecution cases			Done. Continuos awareness and training on-going.	Done. Continuos awareness and training on-going.
		handle sexual harrasment	D.1.9.2	Form a gender committee			Commenced. Target completion defered to Q1 2023 as part of major HR reforms.	Commenced.
			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.
D.2 Respect the right of association	D 2 1	Ensure proper engagement with	D 2 1 1	Evaluate about the membership of union. It suppose to be valuntary however the		<del>                                     </del>	Completed. Part of CBA review and on-going company	Completed
	D.Z.1		D.Z.1.1					Completed.
and collective bargaining		union		current situation indicate that all new workers automaticly become members			restructuring.	
			D.2.1.2	Engage the union to arrange the financial report of membership fee and report to the			On-going.	On-going.
				member				
				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			Done, as part of CBA review in Dec 2020.	Done
				consultation and brainstorming with the management around issues				
				Raise awareness/socialize workers and union on the corporate mindset and culture			 Done, as part of CBA review in Dec 2020.	Done

Health and Safety	D.3.1	Conduct risk analysis of safety	D.3.1.1	Conduct hazard identification and risk assessment of all part of workplace in the mill and					Done.	Done.
		and health and implementing		estate. Arrange the action plant to determine the control of the risk base on the risk						
		action plan		management hierachy						
				Socialization the HIRADC to the workers					On-going.	On-going.
				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					Done	Done
				action (mill)						
			D.3.1.5	Arrange JSHC in every site that consist of management and worker/union					Done	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					Completed.	Completed.
				(farm)						·
			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					Done. Periodic review on-going	Done. Periodic review on-going
				during a year					0.0	
			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		Arrange OSH training identification and training program					On-going.	On-going.
				Arrange the timebound plan for training, socialization, simulation related to OSH					On-going.	On-going.
				Training ISO 45001or training from Ministry of Manpower to ensure the competency					Yet to commence. Re-adjusted target agaain to Q1	Yet to commence.
			D.J.L.J.	base on government qualification for OSH/Sust Dept					2023 to account for company restructuring and	Tet to commence.
				base on government qualification for Ostry sust Dept					mobility constraints.	
	D 2 2	Provision of PPE and protection	D 2 2 1	Provide safety equipment to handle emergency on the workplace related to chemical i.e			-		On-going.	On-going.
	0.3.3	from chemical exposure	D.3.3.1	emergency shower and eve washer in chemical warehouse, etc					On-going.	Oil-goilig.
		from chemical exposure	D 2 2 2	Provide the sufficient PPEs for the sprayer				-	On-going.	On-going.
				Provide the PPEs storage for the sprayer to avoid contamination in their house				-	On-going.	On-going.
				Socialization on the chemical (pestiside and fertilizer) direct body contact to the worker		<del>                                     </del>	-		On-going.	On-going.
			D.3.3.4	as well as the community (suggest the community not to take and comsume the palm					Oli-gollig.	Oil-going.
			D 2 2 F	fruit taken from the farm) Socialization not to use the waste bin for water storage				-	0	On-going.
				Evaluate PPEs quality and consider other treatment to minimise risk					On-going.	
									On-going.	On-going.
				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					On-going	On-going
				body						
				Provide sufficient warehouse to store the hazardous waste					Done.	Done.
				Engage with the licensed user to take out the hazardous waste					Completed.	Completed.
	D.3.4		D.3.4.1	Update the percentation of payment in the HR and Employment Manual with regards to					Done.	Done.
		for all workers		NASSCORP membership						
				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					On-going.	On-going.
				payment for the worker who got the accident in 2015						
	D.3.5	Provision of adequate housing	D.3.5.1	Educate the worker on the housing maintenance since commonly the community house					On-going.	On-going.
		and health facility for the	1	is different to the house provided by company. It is include to the proper usage of toilet.		1   1				
		workers and family		, , , , , , , , , , , , , , , , , , , ,						
			D.3.5.2	GVL to provide dedicated doctor in each of the central clinic and make schedule to visit					Process re-organized in consultation with MOH to	Process re-organized in consultation with MOH
				other clinic in other site.					operate a VMO in Sinoe and GK, and refer serious	operate a VMO in Sinoe and GK, and refer serior
		1	1	(1) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1 1	1 1 1			cases to nearby Hospitals.	cases to nearby Hospitals.