

Socfin (#35930) – Environmental and Social Action Plan

Expected disclosure date: July 31, 2015

Expected Board date: October 2, 2015

| | Description of the Action Item | Anticipated Completion Date |
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| | Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts | |
| i. | <p><u>E&S Management System:</u> Socfin will develop and implement a formal corporate environmental and social management system (ESMS) for all existing and future operations that is consistent with Performance Standard 1, all applicable legal and other requirements (such as those contained within RSPO and FSC), and commensurate with the level of the environmental and social risks and impacts of the operations. This may include for example aspects/impacts and hazards/risks identification, development of risk/impact mitigation measures; the setting of objectives and targets to drive continuous improvement; the provision of appropriate resources (financial and personnel); training, inspection and internal auditing; non-compliance and mitigation; EHS monitoring; stakeholder communication and engagement. The ESMS shall include, but not be limited to the following actions:</p> <ol style="list-style-type: none"> 1) Develop and implement a corporate-wide land acquisition / concession expansion and involuntary resettlement procedure clearly defining the steps that need to be undertaken at each of its operations in future.¹ 2) Corporate Stakeholder Engagement Strategy and Framework developed, publically communicated and implemented. 3) Biodiversity Conservation Policy & Strategy developed and implemented at corporate level, including the commitment to no development in critical habitat and HCV areas. 4) Develop and implement an E&S risk assessment procedure to ensure a PS1 aligned E&S assessment is undertaken for all new expansions, plant constructions and new acquisitions. | <ol style="list-style-type: none"> 1) September 2015 2) September 2015 3) September 2015 4) September 2015 5) November 2015 |

¹ This will includes, but is not restricted to: (i) undertaking an ESIA (to IFC Performance Standards) before acquisition and/or expansion, and identification of measures needed to manage or develop a concession or processing facility in compliance with performance standards; (ii) obtaining all relevant national legal permits; (iii) developing a time bound action plan to bring about compliance with performance standards requirements; (iv) assigning appropriate human and financial resources to implement the action plan; (v) ensuring Informed Consultation and Participation of Affected Communities in concession development plans, including ESIA results and development of action plans.

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| | <p>5) Key Performance Indicators and targets developed. Develop a scorecard to include all relevant E&S aspects for each type of operation. Implementation at all operations after 1 year. Key Performance Indicators (KPIs) will include environmental, OHS, social and biodiversity aspects.</p> <p>6) Key Performance Indicators to be reported in Sustainability Report covering year 2016 (i.e. to be reported in the 2017 edition of the report).</p> <p>7) Sustainable Sourcing Policy and Smallholder Code of Conduct developed and implementation started.</p> <p>8) ESMS developed and implemented at corporate level and implementation plan for all operations agreed.</p> <p>9) Independent E&S audits at corporate level and all concessions commissioned by Socfin and undertaken by a qualified third-party accepted by IFC. Subsequent E&S audits will be performed after 6 months if gaps between Socfin's practice and Performance Standards requirements are still identified and every 6 months thereafter until all gaps are closed.</p> <p>Indicators of completion:</p> <p>1) Send all documents to IFC for review and approval and communication notice².</p> <p>2) Send all documents to IFC for review and approval and communication notice.</p> <p>3) Send all documents to IFC for review and approval and communication notice.</p> <p>4) E&S risk assessment procedure send for review and approval and communication notice.</p> <p>5) Scorecard sent to IFC for review and approval</p> <p>6) 2017 Sustainability Report including the scorecard is published.</p> <p>8) Send all documents for review and approval and communication notice.</p> <p>9) ESMS supporting evidence of corporate policies and monitoring reports. Implementation plan for all operations send for review and approval.</p> <p>10) Independent E&S audit report demonstrating implementation of the corrective measures set in the ESAPs and compliance with IFC PSs for review and approval.</p> | <p>6) January 2017</p> <p>7) November 2015</p> <p>8) November 2016</p> <p>9) November 2016</p> |
| <p>II.</p> | <p><u>Assessment of Environmental and Social Impacts:</u> Before making any investment to expand or develop its existing plantation estate, acquire new plantation assets or develop processing plant capacity, Socfin shall demonstrate to IFC's satisfaction that environmental and social risks / impacts associated with the proposed expansion have been identified, assessed, that suitable mitigation measures have been designed, and that the necessary resources applied, or that they will be applied, to subsequently implement these mitigation measures, such that the expansion</p> | |

² For all indicators of completion, a final version will be required in case the documents for review are deemed incomplete. Action items are completed when IFC sends completion notification.

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| <p>will be compliant with the objectives of the Performance Standards and the requirements therein, in a manner consistent with the procedure to be developed at I (2) and (5).</p> <p>In particular, for its operations in Liberia, Ivory Coast, Nigeria, Sierra Leone, Cameroon, Ghana, Sao Tome, and Cambodia, as part of the ESMS, Socfin shall:</p> <ol style="list-style-type: none"> 1) Undertake an Environmental, Biodiversity (desk assessment) and Social assessment (desk assessment) for all concessions as stated in the TOR shared with Socfin. Assessment will be done against the requirements of IFC PSs, focusing on occupational health and safety (OHS), Environmental (including Biodiversity and Ecosystems Services considerations) and Social (including related to land acquisition, past and future resettlement and livelihood restoration) issues and the RSPO or FSC certification requirements for palm and rubber plantations respectively, and development of mitigation measures for all current operations. Analysis will include action plans, budgets and timelines for implementation. The analysis of social impacts will target (in the area of concession influence) local communities inside and outside the concessions. Timelines shall be as indicated below: <ol style="list-style-type: none"> a) Liberia, Sierra Leone, Ghana and Ivory Coast completed and Action Plans, including stakeholder engagement plans agreed with IFC and publically disclosed in Socfin’s website and locally. b) Sao Tome and Cambodia completed and Action Plans, including stakeholder engagement plans agreed with IFC and publically disclosed in Socfin’s website and locally. c) Nigeria and Cameroon completed and Action Plans, including stakeholder engagement plans agreed with IFC and publically disclosed in Socfin’s website and locally. d) DRC completed and Action Plan, including stakeholder engagement plan agreed with IFC and publically disclosed in Socfin’s website and locally. 2) Undertake a detailed ESIA, including biodiversity and socio-economic assessment, to include ecosystem services considerations, including baseline, for affected communities inside and outside all of its concessions. This will be done by a qualified IFC approved third-party. As follows: <ol style="list-style-type: none"> a) Liberia, Sierra Leone, Ghana and Ivory Coast b) Sao Tome and Cambodia c) Nigeria and Cameroon d) DRC and Indonesia <p>Indicators of completion:</p> <ol style="list-style-type: none"> 1) Send assessment reports and ESAPs to IFC for review and approval and communication notice³. | <ol style="list-style-type: none"> 1) Phases <ol style="list-style-type: none"> a. September 2015 b. November 2015 c. February 2016 d. May 2016 2) Phases <ol style="list-style-type: none"> a. January 2016 b. January 2016 c. February 2016 d. May 2016 |
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| | 2) Send ESIA reports to IFC for review and approval and communication notice ⁴ . | |
| III. | <p><u>Supply Chain Risk Assessment and Management:</u> Socfin shall:</p> <ol style="list-style-type: none"> 1) Develop and implement a Sustainability Sourcing Policy and Suppliers Code of Conduct. 2) Establish a supplier database to screen and identify suppliers by risk areas.⁵ 3) Ensure that suppliers are required to adhere to the Sustainability Sourcing Policy requirements by signing Socfin’s Code of Conduct which will explicitly outline supply chain related requirements, including provisions against child and forced labor, prohibition of conversion of natural and critical habitat, and of encroachment in Indigenous Peoples land. 4) Establish and implement a training program for its field staff dealing with suppliers to: (i) create awareness on - and ensure knowledge of Socfin enhanced Sustainability Sourcing Policy; and (ii) provide training to suppliers on sustainable agricultural practices to help farmers improve yields, quality, and negative impacts on biodiversity, and/or use of child labor and forced labor. 5) Establish and implement a monitoring system to report on status of the implementation of its Sustainability Sourcing Policy, including information on suppliers and monitoring results. <p>Indicator of completion:</p> <ol style="list-style-type: none"> 1) to 3) Documents send to IFC for review and approval. 4) Provide IFC with an overview of the work plan and materials for the implementation of the training program on E&S data collection for field staff. Provide IFC with evidence for the implementation of the training program on sustainable agricultural practices for suppliers as appropriate. 5) Present to IFC the monitoring system and reports to senior management for review and approval. | <ol style="list-style-type: none"> 1) November 2015 2) July 2016 3) July 2016 4) July 2016 5) July 2016 |
| IV. | <p><u>Organizational Competency:</u> In order to develop skilled internal E&S management capacity, Socfin shall:</p> <ol style="list-style-type: none"> 1) Define the roles & responsibilities for E&S Director and staff 2) Retain senior level (e.g. a Director or Partner of a consulting firm) full time qualified E&S consultant, until a permanent Corporate E&S Director is hired, allowing for a transition period of at least 3 months. | <ol style="list-style-type: none"> 1) September 2015 2) September 2015 3) September 2015 |

⁴ For all indicators of completion, a final version will be required in case the documents for review are deemed incomplete. Action items are completed when IFC sends completion notification.

⁵ The policy will guide the development of systems and verification practices that will (i) identify where the areas from where supply is sourced and the habitat type of this area; (ii) provide for an ongoing review of Socfin’s supply chain; (iii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or progress towards verification or certification under a credible scheme in certain commodities and/or locations); and (iv) where possible, require actions to improve Socfin’s supply chain performance.

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| | <p>3) Retain a recruitment search consultancy company to conduct an international search for a Corporate E&S Director to strengthen the E&S team.</p> <p>4) Hire a qualified, dedicated full time Corporate E&S Director, who will occupy a position that is both integral and equal to Socfin’s existing (corporate) senior management team and organization. This individual will be provided with the authority (and budget and personnel as appropriate) to execute the development and implementation of the actions described within this ESAP, including but not limited to items 1 and 2, both at the corporate level and guiding and supporting activities at the plantation/plant level, including identification and dissemination of lessons and E&S best practices throughout Socfin’s business worldwide.</p> <p>5) Retain one qualified EHS expert⁶ and one qualified Community liaison expert⁷ for each concession in Liberia, Ghana, Ivory Coast, and Sierra Leone.</p> <p>6) Retain one qualified EHS expert and one Community liaison expert in place for each concession in Sao Tome and Cambodia.</p> <p>7) Retain one qualified EHS expert and one Community liaison expert in place for each concession in Nigeria and Cameroon.</p> <p>8) Retain one qualified EHS expert and one Community liaison expert in place for each concession in DRC and Indonesia.</p> <p>9) Retain a qualified Corporate Biodiversity Specialist and relevant Field Biodiversity Specialist(s) for the priority concession (Liberia, Sierra Leone, Ivory Coast, Ghana, Nigeria, Sao Tome, and Cambodia – and potentially others).</p> <p>In the event that the Corporate E&S Director, Biodiversity Specialist or EHS and community liaison staff cease employment with Socfin during the lifetime of IFC’s investment with Socfin, then the position will be retained and re-staffed.</p> <p>Indicators of completion:</p> <p>1) Send the Terms of Reference for the E&S Director / Consultant to IFC.</p> <p>2) To 9) send to IFC the CVs of candidates for approval and employment confirmation letter from the company for previously IFC approved candidates.</p> | <p>4) July 2016</p> <p>5) November 2015</p> <p>6) May 2016</p> <p>7) May 2016</p> <p>8) May 2016</p> <p>9) May 2016</p> |
| V. | <p><u>Training:</u></p> <p>1) Undertake a training needs analysis and outline design.</p> | <p>1) December 2015</p> |

⁶ As per TOR agreed with Socfin.

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| | <p>2) Design and implement a Sustainability training program which will focus on Socfin’s Corporate Sustainability policies and procedures.</p> <p>3) Deliver training sessions to all staff, including temporary workers and contractors, according to need.</p> <p>Indicator of completion:</p> <p>1) Send documents to IFC for review and approval and communication notice.</p> <p>2) Send documents to IFC for review and approval and communication notice⁸.</p> <p>3) Send plan with dates, training staff and participants list to IFC for review.</p> | <p>2) December 2016</p> <p>3) December 2016</p> |
| VI. | <p><u>Stakeholder and Community Engagement Plan:</u></p> <p>Socfin will develop and successfully implement a Corporate Stakeholder Engagement Strategy, and implement associated local Stakeholder Engagement Plans, at all country operations, appropriate to Socfin’s level of impacts. This will include: (i) mapping all relevant stakeholders, (ii) prioritizing them by any potential negative impacts that they may be subject to, (iii) identify how the company will engage with each category of stakeholder; and (iv) developing a plan for how to further engage with them, disclose project-related information and on-going reporting.</p> <p>1) Stakeholder and community engagement plans developed and documented in Liberia, Ghana, Ivory Coast, and Sierra Leone. These plans will include community programs, appropriate to Socfin’s level of impact upon such communities.</p> <p>2) Stakeholder engagement plans implemented in Liberia, Ghana, Ivory Coast, and Sierra Leone.</p> <p>3) Stakeholder and community engagement plans developed and implemented in all concessions in Cambodia, Sao Tome, DRC, Nigeria, Cameroon and Indonesia.</p> <p>4) Report annually activities undertaken under these plans.</p> <p>Indicator of completion:</p> <p>1) 2) and 3) Send documents to IFC for review and approval and communication notice⁹.</p> <p>4) Report summarizing Socfin’s corporate stakeholder engagement activities and also details of engagement at the community level, including investments made and results of initiatives.</p> | <p>1) September 2015</p> <p>2) December 2015</p> <p>3) July 2016</p> <p>4) Reported annually on Socfin Sustainability Report</p> |

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| VII. | <p><u>External Communication and Grievance Mechanism:</u> Socfin will develop and successfully implement an External Communication Strategy and a Grievance Mechanism, at all operations (including Socfin’s security arrangements) in all countries of operation. This will enhance operational capacity and internal coordination mechanisms for ensuring appropriate communication with communities and other interested parties, including any grievances they may have related to security personnel engaged by Socfin. This will include but be not limited to: (i) the type of communication and disclosure of information to communities, (ii) frequency of communication, and (iii) logging, tracking and feedback provided of complaints resolution to communities.</p> <p>1) Grievance Mechanism established and implemented at corporate and country operations. 2) Corporate communication strategy developed and implemented and team in place.</p> <p>Indicator of completion: 1) and 2) Send documents for review and approval and communication notice¹⁰. 3) Report summary of Socfin’s grievance mechanism results.</p> | <p>1) September 2015 2) September 2015 3) On an annual basis through its Sustainability report.</p> |
| VIII. | <p><u>Concession permits and litigations:</u></p> <p>1) Existing litigations and grievances addressed and satisfactory implementation action plan agreed in all countries. Implementation of mitigation measures as per agreed action plan. 2) Obtain Concession agreements and Environmental permits for all concessions.</p> <p>Indicators of completion: 1) Send all documents to IFC for review and approval and communication notice. 2) Environmental permits and concession agreements sent for review.</p> | <p>1) September 2015 2) December 2016</p> |

¹⁰ For all indicators of completion, a final version will be required in case the documents for review are deemed incomplete. Action items are completed when IFC sends completion notification.

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| IX. | <p><u>Emergency Preparedness and Response Plan:</u> Socfin will strengthen, document and maintain an emergency preparedness and response system in each concession so to be prepared to respond to accidental and emergency situations associated with its operations in a manner appropriate to prevent and mitigate any harm to human health or the environment. This preparation will include the identification of issues that have potential to cause emergency situations, areas where emergency situations may occur, communities and individuals that may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communication, including with potentially Affected Communities and government authorities, and periodic training to ensure effective response. The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions</p> <ul style="list-style-type: none"> • Emergency Preparedness and Response Plan established and implemented at each concession <p>Indicator of completion:</p> <ul style="list-style-type: none"> • Documents sent to IFC for review and approval | December 2015 |
| X. | <p><u>Specific Country Supplemental ESAPs:</u> Implement the mitigation measures identified in the ESAPs for all operations as per agreed timeline.</p> | As per country supplemental ESAP items and timeline |
| Performance Standard 2: Labor and Working Conditions | | |
| XI. | <p><u>Human Resources Policy and procedures for direct workers and contractors:</u> Update, align and implement policy and procedures to include all PS2 requirements for direct employees and contractors. These will include commitment and actions to comply with host nation legal requirements, and make provisions related to all requirements under PS2.</p> <p>Indicators of completion:</p> <ul style="list-style-type: none"> • HR policy and procedures sent to IFC for review and note of communication to employees and contractors | May 2016 |

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| XII. | <p><u>Worker dormitories/housing:</u> Finalize program to upgrade worker dormitories/housing to ensure all workers with access to this benefit have suitable living accommodations. Workers’ housing should be built and maintained to internationally recognized standards such as Workers’ Accommodation: Processes and Standards (IFC and the EBRD, 2009).</p> <ol style="list-style-type: none"> 1) Test results showing potable water as provided in company housing and in the workplace meets World Health Organization Standards. If not, mitigation measures will be implemented. 2) Review upgrading plans and ensure standards for housing are in line with IFC/EBRD. 3) Review inventories and develop implementation plan for all concessions. 4) Finalize upgrade of dormitories. <p>Indicators of completion:</p> <ol style="list-style-type: none"> 1) Reports of test showing water meets WHO standards. 2) Report describing worker housing and progress upgrade 3) Report on AMR on progress | <ol style="list-style-type: none"> 1) November 2015 2) December 2015 3) December 2015 4) December 2018 |
| XIII. | <p><u>Grievance Mechanism For employees, contractors, and temporary workers:</u> Develop and implement a grievance mechanism for each concession in compliance with IFC’s PS2 requirements and make accessible and communicate to permanent and temporary employees and contractors. The grievance mechanisms should be appropriate to the localities and shield workers from retribution, allow for timely response and feedback, and be gender sensitive.</p> <p>Indicator of completion:</p> <ul style="list-style-type: none"> • Documents sent to IFC for review and approval | September 2015 |
| XIV. | <p><u>Contractual provisions for contractors and temporary workers:</u></p> <ol style="list-style-type: none"> 1) Develop and implement a procedure to ensure contractor labor and working conditions (inclusive of OHS) comply with PS2 requirements. | 1) March 2016 |

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| | <p>2) Begin providing standard written contracts and specify working conditions for temporary/casual laborers. Contracts shall state that Socfin has the right to audit these contractors and will monitor and document contractors' performance as part of daily business of its operations.</p> <p>3) Socfin will formalize and implement an internal contractor E&S performance audit procedure.</p> <p>4) Management review of internal contractor E&S audit findings and report on corrective actions.</p> <p>Indicator of completion:</p> <p>1) Documents send to IFC for review and approval.</p> <p>2) Present sample of contract provisions to IFC for review and approval.</p> <p>3) Present procedure to IFC for review and approval.</p> <p>4) Present sample of monthly internal reports demonstrating Socfin's monitoring and documenting contractors' EHS performance.</p> | <p>2) March 2016</p> <p>3) March 2016</p> <p>4) March 2016</p> |
| <p>XV.</p> | <p><u>Occupational Health and Safety plans and monitoring:</u></p> <p>1) Assess OHS risks and impacts in all operations.</p> <p>2) Based upon the risk assessment the company will follow the hierarchy of elimination, substitution, engineering controls, administrative controls and then provide appropriate personal protective equipment (PPE) for all workers, including contractors and temporary workers,</p> <p>3) Include the following indicators in senior management updates: (i) fatalities, (ii) Lost Time Incident Frequency Rate (LTIFR - Number of injuries per million hours worked); (iii) LTIR (Lost Time Incident Severity Rate); and (iv) Accident Free Days (Number of Days since last Lost Time Incident).</p> <p>4) Implement training programs on OHS at all concessions focusing on those tasks that were shown to have residual risks. Access will be available to direct employees and contractors.</p> <p>5) Implement the mitigation measures identified in the ESAPs for all operations.</p> <p>Indicator of completion:</p> <p>1) OHS risk assessments send to IFC for review and approval</p> <p>2) Implementation plan sent to IFC for review and approval</p> <p>3) KPI selected send to IFC for review and approval</p> <p>4) Training plan send to IFC for review and approval</p> <p>5) Country Supplemental ESAP completion report</p> | <p>1), 2), 3) March 2016</p> <p>4) Every year</p> <p>5) As per country supplemental ESAP items and timeline</p> |

| Performance Standard 3: Resource Efficiency and Pollution Prevention | | |
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| XVI. | <p><u>Resource Efficiency review for Liberia, Sierra Leone, Ghana, and Ivory Coast:</u></p> <ol style="list-style-type: none"> 1) Socfin will undertake resource efficiency assessments at all industrial operations. 2) Mitigation measures will be implemented to improve efficiency in the use of energy, water and chemicals and raw material yield. 3) Update resource efficiency KPIs and monitor and report upon the following: (i) specific consumption of thermal and electrical energy and water and raw material yield (ii) reductions in energy and water requirements and hence waste water generated, (iii) production enhancement resulting from yield improvements, and (iv) associated cost reduction <p>Indicator of completion:</p> <ol style="list-style-type: none"> 1) Resource efficiency assessments send to IFC for review and approval 2) Implementation plan sent to IFC for review and approval 3) KPI selected send to IFC for review and approval | 1) to 3) April 2016 |
| XVII. | <p><u>GHG Emissions monitoring:</u></p> <p>The Company will develop a system for measuring and reducing GHG emissions associated with its primary production and processing operations. This system will have clear procedures to guide its assessment and reporting on GHG emissions, specify clear responsibility for the accounting process, and communicate effective procedures to appropriate personnel and contractors.</p> <p>Indicator of completion:</p> <ul style="list-style-type: none"> • Documents send to IFC for review and comment | December 2016 |
| XVIII. | <p><u>Air emissions:</u></p> <ol style="list-style-type: none"> 1) Monitor point source air emissions as required by the WBG General EHS Guidelines (above 3MWth) (e.g. boilers used within the palm oil mill and dryers utilized at rubber plants). 2) Develop action plans and implement corrective actions. <p>Indicator of completion:</p> | 1) and 2) July 2016 |

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| | <ol style="list-style-type: none"> 1) Monitoring reports send to IFC for review and approval 2) Action plans send to IFC for review and approval | |
| XIX. | <p><u>Water Extraction permits:</u> Obtain all water abstraction permits for all operations.</p> <p>Indicator of completion:</p> <ul style="list-style-type: none"> • Documents send to IFC for review and comment | April 2016 |
| XX. | <p><u>Wastewater Management:</u></p> <ol style="list-style-type: none"> 1) Review wastewater management at processing plants and consider the possibility of use of bio-digesters, and beneficial use of resulting biogas. 2) Monitor point source wastewater emissions and compare waste water quality with WBG EHS Guideline requirements and local regulation. 3) In areas where wastewater is routed directly into the environment (e.g. drainage of rubber storage to rivers at Ivory Coast and Sao Tome), undertake monitoring of quality of waste water. 4) If necessary develop action plans to bring waste water quality into compliance with IFC and local requirements. Agree implementation priorities and timelines with IFC and implement corrective actions according to these timelines. <p>Indicator of completion:</p> <ol style="list-style-type: none"> 1) And 2) Monitoring reports send to IFC for review and approval 3) Assessment send to IFC for review and approval 4) Action plans send to IFC for review and approval | 1) to 4) April 2016 |
| XXI. | <p><u>Hazardous Materials Management:</u> The company will establish and implement specific guidelines and procedures, communicate them to staff and contractors, and ensure hazardous materials are stored, managed, and disposed according to IFC Performance Standards. For example, ensure storage containers are adequate, and control fuel tanks for integrity – avoid leakages.</p> <ol style="list-style-type: none"> 1) Undertake a hazardous material inventory at all operations and determine appropriate procedures for handling, storage and disposal. 2) Provide adequate secondary containment for fuel storage and at filling stations in all concessions. | 1) to 4) April 2016 |

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| | <p>3) Develop and implement plans for clean-up and disposal of fuel contaminated soil in all concessions. 4) Install and maintain oil water separators at refueling facilities, and workshops in all concessions.</p> <p>Indicator of completion: 1) To 4) Documents send to IFC for review and approval</p> | |
| XXII. | <p><u>Waste Management:</u> Socfin will develop and implement operating procedures for appropriate waste management which will include the following:</p> <ol style="list-style-type: none"> 1) Review of waste sources characterizing waste by type, quantities, and potential use/disposal 2) Establishment of waste management priorities based on a risk analysis. 3) Analyze pollution prevention opportunities, including waste reduction, treatment, storage, and disposal options. 4) Implement procedures for waste reduction, management and disposal in all concessions <p>Indicator of completion: 1) to 4) Documents send to IFC for review and approval</p> | <ol style="list-style-type: none"> 1) December 2016 2) December 2016 3) December 2016 4) July 2017 |
| XXIII. | <p><u>Pesticide Use and Management:</u></p> <ol style="list-style-type: none"> 1) Formulate and implement an Integrated Pest Management (IPM) approach at a corporate level and implement specific IPM practices at country operations. 2) Phase-out use of WHO Recommended Classification of Pesticides by Hazard Class Ia (extremely hazardous); or Ib (highly hazardous). 3) Inventory of all Class II (moderately hazardous) chemicals used by operation, and type of use. 4) If Class II products are used, develop procedures to ensure appropriate controls on procurement, handling, storage and use of these chemicals is applied. <p>Indicator of completion: 1) to 4) Documents send to IFC for review and approval.</p> | <ol style="list-style-type: none"> 1) to 4) April 2016 |
| Performance Standard 4: Community Health, Safety, and Security | | |
| XXIV. | <p><u>Security Personnel procedures:</u></p> <ol style="list-style-type: none"> 1) Develop and implement procedures for managing the use of security personnel, (in-house and third-party) including: vetting of personnel, written code of conduct, training, grievance mechanism, | <ol style="list-style-type: none"> 1) December 2015 |

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| | <p>investigation and police referral procedures in the event of incidents, and adequate managing use of force.</p> <p>2) Implement training sessions for its own and third party security contractors.</p> <p>Indicator of completion:</p> <p>1) and 2) Documents send to IFC for review and approval.</p> | <p>2) July 2016</p> |
| Performance Standard 5 : Land Acquisition and Involuntary Resettlement | | |
| XXV. | <p><u>Resettlement, Compensation and Livelihood Restoration Framework:</u></p> <p>1) Develop and implement a resettlement and compensation action plan for all concessions where it is required as per the assessment undertaken.</p> <p>2) Develop and implement resettlement action plans or livelihood restoration action plans for all concessions where this is required as per the assessment undertaken.</p> <p>Indicator of completion:</p> <p>1) And 2) Documents send to IFC for review and approval.</p> | <p>1) November 2015</p> <p>2) As per the timeline agreed in the assessment under point II.2</p> |
| XXVI. | <p><u>M&E Plan for Livelihood Measures:</u></p> <p>1) As part of the measures to restore and/or improve livelihoods, the Company will develop a monitoring and evaluation plan based on collecting and analyzing data for household-level livelihood outcomes among Affected Persons and Affected Communities over a three-year period after economic displacement in a given area.</p> <p>2) Socfin will retain a qualified and IFC approved third party to undertake an audit in all concessions with land and resettlement issues. If gaps are identified additional audits will be undertaken every 6 months thereafter and until gaps are closed.</p> <p>3) Report on implementation plans every year.</p> <p>Indicator of completion:</p> <p>1) Documents send to IFC for review and approval.</p> <p>2) Third party monitoring reports send to IFC for review and approval.</p> <p>3) Documents send to IFC for review and approval.</p> | <p>1) December 2015</p> <p>2) July 2016</p> <p>3) Reports send every year as of end of 2015</p> |

| Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resources Management | |
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| XXVII. | <p>Socfin shall:</p> <ol style="list-style-type: none"> 1) Provide evidence of legal permission to develop and operate concessions and consultations with protected area managers, affected communities and other stakeholders where concessions overlap or are within with known protected areas. 2) Obtain RSPO membership for Socfin Group. 3) Obtain RSPO Secretariat opinion with regards to RSPO membership and certification in the light of the company not following the RSPO's New Plantings Procedure (NPP) when establishing new plantations (for example in Sao Tome and Ghana). 4) Conduct a biodiversity desk assessment as per action number II. 5) Conduct full biodiversity assessment, including screening for ecosystem services, biodiversity monitoring programs (for critical habitat), and consideration of invasive alien species, for each concession. Assessments will include critical habitat assessment where these are suspected. 6) Develop timebound biodiversity action plans for each concession to address gaps in PS6 compliance, including timebound plans to achieve certification or audited voluntary compliance. 7) Establish agreed partnerships (MoU) with recognized and credible conservation organizations and/or academic institutes with respect to existing or potential developments that could affect critical habitat. 8) Implementation of the biodiversity action plans. 9) Commission audits against the Biodiversity Action Plan (for concessions with biodiversity issues) by acceptable and qualified consultant or organization. If gaps are identified additional audits will be undertaken every 6 months and thereafter until gaps are closed. 10) Achieve RSPO certification for palm oil operations. 11) Complete audited voluntary compliance with FSC for rubber plantations. <p><u>Indicator of completion:</u></p> <ol style="list-style-type: none"> 1) Evidence of legal approval by relevant regulator and consultations reports send to IFC for review. 2) And 3) Evidence of RSPO response |
| | <ol style="list-style-type: none"> 1) September 2015 2) September 2015 3) September 2015 4) September 2015 5) January 2016 6) June 2016 7) December 2015 8) As per country supplemental ESAP items and timeline 9) December 2016 10) December 2018 11) December 2017 |

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| | <p>4) Desk biodiversity assessment including maps of natural/modified habitat based on satellite imagery, description of critical habitat values, and full IBAT screening approved by IFC.</p> <p>5) And 6) Complete biodiversity assessments and plans approved by IFC</p> <p>7) MoU or equivalent agreement with credible partner send to IFC for review.</p> <p>8) Evidence of implementation.</p> <p>9) Audit reports send to IFC for review and approval.</p> <p>10) and 10) Certifications and audit provided to IFC.</p> | |
| XXVIII. | <p><u>Sao Tome and Cambodia</u> Socfin shall:</p> <p>1) Sign a partnership agreement with at least one reputable international recognized and credible conservation organizations and/or academic institutes to preserve areas of critical habitat within and adjacent to each concession.</p> <p>2) Implement a biodiversity management plan developed and implemented in line with PS 6</p> <p><u>Indicator of completion:</u></p> <p>1) MoU or equivalent agreement with credible partner send to IFC for review.</p> <p>2) Sent plans to IFC for review and approval. Implementation to be audited through third party audits as per action item I.</p> | <p>1) November 2015</p> <p>2) Plan by December 2015. Implementation as per action plan.</p> |
| Performance Standard 7: Indigenous Peoples | | |
| XXIX. | <p><u>Cambodia operation:</u> Socfin shall:</p> <p>1) Engage with relevant organizations and enter into negotiations with Affected Indigenous Peoples and agree on an action plan to ensure impacts of the concession are clarified and gaps in compensation process are addressed in compliance with IFC requirements.</p> <p>2) Enter a free, prior, and informed consent process to determine mitigation and compensation required.</p> <p>3)</p> <p>4) Commission a third party audit to ensure Livelihood restoration is completed.</p> <p><u>Indicator of completion:</u></p> <p>1) Send agreed action plan organization to IFC for review and input.</p> | <p>1) October 2015</p> <p>2) As agreed with Affected Indigenous Peoples.</p> <p>3) After 3 years agreement.</p> |

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| | <p>2) Documents send to IFC for review and approval.</p> <p>3) Audit report send to IFC for review and approval.</p> | |
| Performance Standard 8: Cultural Heritage | | |
| XXX. | <p><u>Protect Cultural Heritage:</u></p> <p>Socfin will develop and implement procedures related to protection of cultural heritage and ensure that such procedures are effectively communicated to field staff and transferred to contractors.</p> <p>Indicator of completion:</p> <ul style="list-style-type: none"> • Documents send to IFC for review and comment. | April 2016 |