

Socfin Group policy for responsible management

1. Context and Intentions

Created early in the 20th century, the SOCFIN Group has become a major player in agro-industrial development in Africa and Southeast Asia.

The Socfin Group is aware of the imperatives of economic development, food safety and the reduction of poverty in host countries and wishes to contribute through this policy, whilst ensuring that the operations for which it is responsible are respecting the environment and implementing best social practices, taking into account the needs and expectations of all stakeholders, whether internal or external, in perfect collaboration and transparency with them.

The Socfin Group is convinced that its activities must create value for all, that these values must be shared with everyone, whilst ensuring the economic viability of the Group and its operations.

The Socfin Group presents herein the principles of its policy and the strategy allowing them to be implemented.

2. Scope of application

This Responsible Management Policy is applicable, without exception, to:

- All operations of the Socfin Group, and those of its subsidiaries, including all the factories, palm oil mills and plantations that the Group owns, manages or in which it invests, regardless of the level of its share.
- All suppliers (third parties) from whom the Group buys or with which it has a trading relationship (notably the purchase of raw materials).

It applies to all the raw materials with which the Socfin Group works and covers all the countries in which it operates.

3. Commitments

3.1 Best management practices

The Socfin Group commits to:

- Comply with the local and international laws and regulations applicable to its operations,
- Minimise and prevent its environmental impacts (pollution of water, ground and air, emission of greenhouse gases and prohibition on the use of fire, ...),
- Facilitate and encourage the inclusion of small holders/farmers in its supply chains,
- Ensure fair and transparent negotiation of prices with small holders/farmers,
- Constantly improve its agricultural practices with the aim of higher yields requiring a minimum of inputs and natural resources.

3.2 Responsible development of its operations

The Socfin Group commits to eliminate deforestation and to respect the rights and consent of local communities in all its operations and supply chains. To that purpose the Socfin Group commits to:

- Identify, maintain and protect High Carbon Stock (HCS) areas,
- Identify, maintain and protect High Conservation Values (HCV) areas,
- Identify, maintain and protect peatlands,
- Respect the right of indigenous populations and local communities to give or withhold their Free, Prior and Informed Consent (FPIC) to all operations affecting the land or resources on which they have legal, community or customary rights.

3.3 Respect of Human Rights

- The Socfin Group commits to:
- Respect and support the Universal Declaration of Human Rights,
- Recognise and respect the rights of all workers, including the workers of its subcontractors, temporary workers and migrant workers,
- Recognise and respect the rights of local and indigenous communities,
- Maintain a transparent and open dialogue with local populations.

3.4 Transparency

The Socfin Group commits to:

- Obtain traceability for 100% of its raw materials supplies,
- Implement an open, transparent and consultative grievance management mechanism,
- Publicly report on the implementation of this policy.

4. Implementation

Since this policy is immediately applicable, no greenfield development can be carried out on until:

- mapping and studies identifying the HCS, HCV and peatland areas have been completed and made public;
- the FPIC procedure has been completed;
- any on-going dispute for the areas in question has been resolved, or an acceptable process for dispute settlement is being implemented and freely consented by the parties concerned.

The Socfin Group commits to make available the human and financial resources necessary for the proper implementation of this policy.

To that purpose, the Group will publish a global action plan elaborated with precise objectives and timelines. To ensure transparency and constant improvement, the progress, updates and adaptations of this action plan will be made and published every 6 months and submitted to the Socfin Board of Directors.

In addition, the Socfin Group will make public the maps of its concessions, its permits and the outcomes of HCS and HCV participatory mappings, if local legislation authorises it.

In order to work constructively the Group will proactively consult and collaborate with all relevant stakeholders (internal and externally) ¹.

The Socfin Group will support and encourage its suppliers to implement this policy. Any supplier not taking immediate remedial actions to correct serious failures or who does it repeatedly shall be removed from the Group's list of approved suppliers.

¹ NGOs, civil society bodies, local and national authorities, local communities, companies neighbouring our operation areas, customers, suppliers and organisations of the profession.

The Socfin Group will support the adoption of government policies to facilitate the rapid transformation of the agro-industry towards responsible development and management practices.

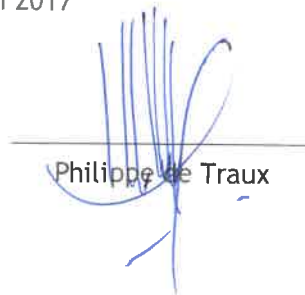
5. Verification

The Socfin Group will use various third-party verification tools such as satellite imagery, certification and consultation of external stakeholders to assess how efficiently and effectively its policy is being implemented. The results of these assessments will be used to update the action plan and allow continuous improvement.

Approved by the Board of Directors on the 22nd of March 2017



Luc Boedt



Philippe de Traux

Appendix: Definitions and specifications

The elements of our policy are listed and defined in this section in order to ensure good understanding by all. However, these definitions and specifications are not intended to be exhaustive or set in stone, and will be updated when necessary.

- High Carbon Stock

The Socfin Group recognises and will implement the High Carbon Stock Approach as defined by the HCS Approach Steering Group and the HCS Toolkit².

- High Conservation Value

The Socfin Group recognises the concept of High Conservation Value as defined by the HCV Resource Network³ and will use the guidelines and tools developed by this network.

The Group actively collaborates with the appropriate authorities and bodies for the protection of endangered and threatened species.

- Peatland

The Group commits not to develop new plantations or infrastructures on peatland. Peat soils are characterised by an organic content of more than 65%, regardless of depth and surface area.

- Free, Prior and Informed Consent (FPIC)

The Group commits to identify and respect the customary and individual rights of the local and indigenous communities through participatory mapping. The Group commits to ensure that the laws and the best international practices in FPIC are implemented for all its operations.

- Workers' rights

The Group commits to ensure that the rights of any individual working in the operations falling within the scope of application of this policy are respected according to applicable local, national and international legislations. The following key elements, in line with ILO conventions, are applicable to our activities:

1. Child labour is prohibited and appropriate measures are implemented to prevent it.
2. Forced or bonded labour and human trafficking is prohibited and appropriate measures are implemented to prevent it.
3. Recruitment practices are transparent and fair, and direct recruitment is encouraged.

² <http://highcarbonstock.org/>

³ <https://www.hcvnetwork.org/>

4. The health and safety of workers are protected from any risk that could generate permanent injury, illness or death.
5. Workers are provided with written employment contracts in a language that they understand, and details of working conditions, including at a minimum: the type of work, the salary and payment conditions, working hours, holidays and other leave, and other benefits of employment.
6. All workers are paid a decent wage that equals or exceeds the minimum legal wage defined by national standards and legal regulations.
7. No worker works more than the legal maximum number of hours; overtime is worked on a voluntary basis, and workers have at least one day of rest every seven days.
8. Workers are protected from any form of discrimination constituting a violation of human rights.
9. Harassment and abuse are prohibited. Policies and procedures will be implemented to prevent and obtain redress for any act of harassment or abuse, notably sexual.
10. Workers at all levels have access to remedy system, whether judiciary or through a credible grievance mechanism, without fear of recrimination or dismissal.

11. Where worker housing is provided, this meets the criteria of hygiene and physical safety, and the conditions of decent housing.

12. Freedom of Association and the right to collective bargaining is respected. All workers, regardless of rank or job grade, have the right to form and join a trade union of their choice, and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, parallel means of free association and bargaining are made available to the workers.

- Environmental impacts

The Group commits to implement the best existing management practices to prevent and reduce its environmental impacts, notably in relation to greenhouse gas emissions (GHG), management of water level in plantations already existing on peatland, prohibition on peatland drainage, prohibition on the use of fire for developing new plantations or preparing land*, soil and water pollution, soil deterioration and erosion, and prohibition on the use of WHO class 1A and 1B chemicals*, to eliminate the use of Paraquat, and develop and implement integrated pest management techniques.

*When the Socfin Group cannot immediately put a stop to the use of certain dangerous practices, the Group commits, in its action plan, to actively conduct research into the use of alternatives in order to cease these practices as soon as possible.

- Grievance management

The Group will develop and implement responsible grievance management mechanism at local, national and international level. The procedures must be transparent, open and collaborative. They must be made public and updated according to stakeholders' comments. The Group hereby commits to resolve all ongoing disputes and complaints in line with this policy.

- Traceability

The Group commits to work in collaboration with its suppliers to make its supply chain transparent whilst taking into account the complexity of the supply chains for certain raw materials.