

Sustainability report

2019



Socfin Agricultural Company

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I. Introduction

1. Message from the General Manager

The last year of this decade has come and gone with its challenges and successes. However, thanks to our continued commitment to engage communities, we operate today in a peaceful coexistence with them. The implementation of Roundtable on Sustainable Palm Oil (RSPO) principles, with an aim to be certified in 2020, has further strengthened the relationship with the Company's stakeholders.

2019 also saw the emergence and commissioning of a new oil refinery in Sierra Leone which came about from the activity of SAC, creating added value to the supply chain and reducing national imports of refined oils, soap and margarines. The investment of SAC clearly helps to bring down stream manufacturing providing additional jobs, additional government revenue through taxes and savings to the economy. Production of Crude Palm Oil (CPO) reached just less than 25 000 tons and, since the commissioning of the refinery, all production from August 2019 has been sold to the refinery.

Exciting research both in irrigation and agronomic science through the assistance of Dr. Thomas Fairhurst has brought optimism to SAC in an endeavour to maximize yields in an environment with a long dry period. The establishment of a Research and Development (R&D) centre will be made in 2020 to support the ongoing research into Best Management Practices (BMP).

Community development within the Community Development Action Plan (CDAP) being a component of the Corporate Social Responsibility (CSR) work has resulted in the completion of one new school built in Kotemahun and the start of two new schools which will be finished in 2020. Rice production and food security ranks as one of the most important initiatives SAC supports: in 2019 over 600 acres of lowland area was ploughed and harrowed to allow communities to plant rice. Over 70% of the seed was purchased and paid by SAC. Additionally, an Inland Valley Swamp (IVS) rice program and women group ground nut production units were established under the Community Liaison Department.

The coming year is exciting with the expansion of SAC's mill being transformed from a 30 T/h to a 60 T/h mill to enable the fruit production in peak periods to be processed. Commissioning of the mill is planned for October 2020.

We look forward to 2020 with improvements and growth, RSPO certification planned and with the bulk of the production being sold locally to the refinery. We hope CPO prices remain firm throughout 2020 to allow our business to grow in Sierra Leone being one of only a handful of successful agricultural businesses.

Philip Tonks, General Manager (GM)



2. Commitment to environmental, social, societal and transparency aspects

The project operates on a 18 473 ha concession of land located in the Pujehun District in the Southern Province of Sierra Leone. The project has been built around 52 communities who co-exist with the plantation. One of the key objectives of SAC is to minimize the impacts of its operations on these communities by ensuring an open dialogue with these stakeholders and developing a strong Environmental, Social and Health Impact Assessment (ESHIA) along with the management plan in place.

SAC's ESHIA was carried out in January 2011 by a Sierra Leonean Environmental Consultancy Office who developed and made public disclosures of the project plan before the establishment of the Company in Malen Chiefdom. This assessment and its Public Disclosure (June 2011) serve to identify the key actions that must complement the design and implementation of the project to address identified environmental and social issues and impacts. These actions are closely controlled by the various stakeholders involved in order to ensure that SAC respects its commitment in the fields of environment, transparency, health, sociology and education.

The following presents some of the various control mechanisms put in place to/by SAC in its strategy for the short, medium and long-term:

- Monthly social and grievances committee meetings with Chiefdom authorities and representatives, SAC's Management, women and youth interest groups and District Authorities, etc.;
- Quarterly environmental monitoring report to the Environment Protection Agency of Sierra Leone (EPA-SL);
- Quarterly audit conducted by the EPA-SL;
- Annual Environmental Impact Assessment (EIA) licence;
- Annual CSR report description for Ministries;
- Annual assessment from the Ministry of Labour and Social Security (MLSS) on the employee safety at work and status;
- Annual environmental internal audit;
- Quarterly water consumption report to the National Water Resources Management Agency;
- Quarterly audit conducted by the National Water Resources Management Agency.

Considering the impacts of the Company's operations on the environment, protection and conservation of natural resources has become a pillar of social responsibility for the business. Therefore, the Company decided to be certified following the ISO 14001:2015 standard for the entire Company's activities. The Company commits to constantly improve its environmental responsibilities and agricultural practices by the recognition, prevention and minimization of the impact of its activities on the natural resources and the communities. Therefore, the Company decided to start to be certified following the Principles and Criteria (2018) of the Roundtable for Sustainable Palm Oil (RSPO) for the entire Company's activities.

3. General profile

SAC is a subsidiary of the Socfin Group and is located in Sahn Malen - Pujehun District (Southern province of Sierra Leone). It has a concession of 18 473 ha and a plantation of 12 349 ha of oil palm and a mill of 30 T/h with 2 biomass boilers: in 2020, the mill capacity will be increased to 60 T/h.

The Company register and postal address CO/4 Guouji Estates, Lumley Beach Road, Freetown however all its operations and workforce are located in Malen Chiefdom on the plantation.

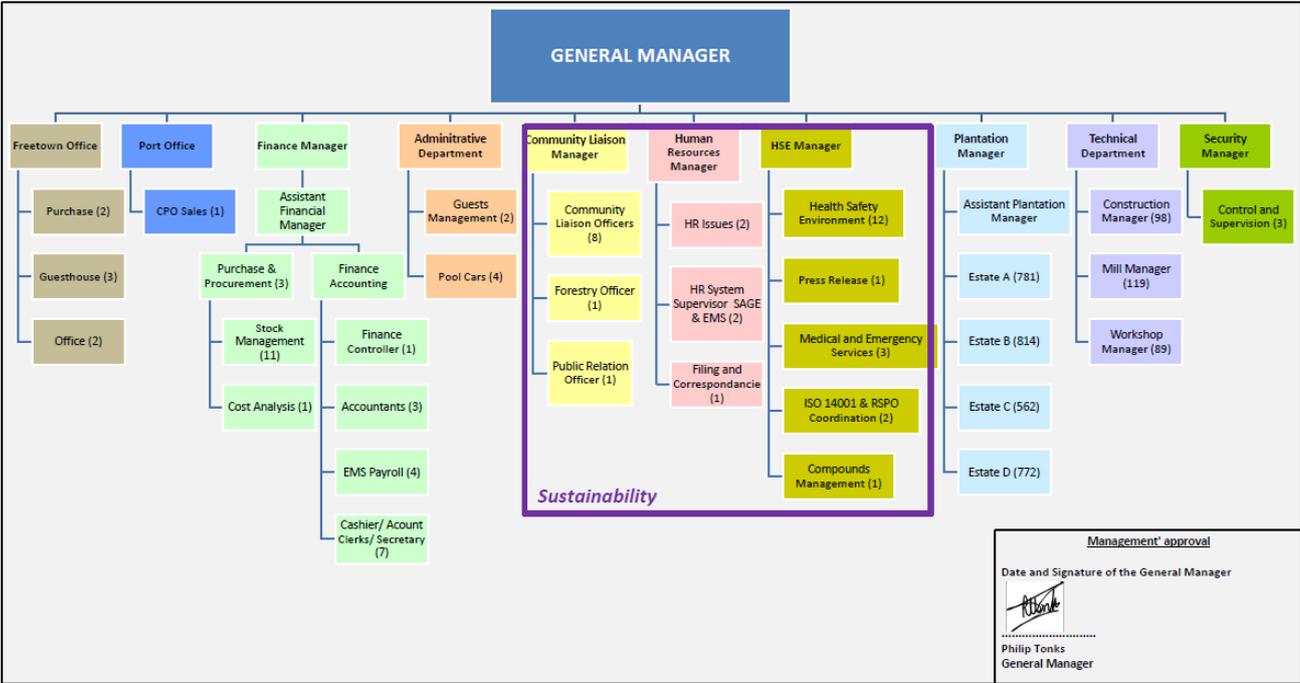
4. Geographical presence in the country

The map below locates the plantation in the Pujehun District, Southern province of Sierra Leone.



5. Hierarchical organization chart of the plantation

The graph below shows the management organogram of the Plantation in 2019.



6. Capital structure (Shareholding)

Socfin Agricultural Company SL LTD Limited Liability Company has two shareholders, the main shareholder being Socfinaf with 93% shareholding and Agrifinal with 7% shareholding.

7. Key dates

2011	Land compensation and starting of operations
> January 2011	Environmental, Social and Health Impact Assessment (ESHIA)
> January-June 2011	Public disclosure of the ESHIA among the stakeholders
April - August 2012	Planting of the first estate called “Estate A”
April - August 2013	Planting of the second estate called “Estate B”
December 2013	Creation of SAC internal quarterly newspaper called “SAC News”
April - August 2014	Planting of the third estate called “Estate C”
April - August 2015	Planting of the fourth estate called “Estate D”
2013 - 2015	Construction of the palm oil mill
July 2014	Completion of the building of Sahn Malen Mosque
November 2014	First “Protected Forest” established in the plantation
2 December 2014	Unanimous ratification of the Memorandum of Understanding (MoU) between the Company and the Sierra Leonean Government
December 2014	Collaboration with the phone company AFRICEL to provide phone coverage in the entire Malen Chiefdom
14 February 2015	Organization of the village health competition - Ebola prevention
March 2015	Beginning of the processing of Fresh Fruit Bunches (FFB) in estate A
March 2015	Construction of the workers entertainment center: the canteen
March 2015	Official opening of the GTBank built by the Company
June 2015	Inauguration of the extension of the health center of Sahn Malen
June 2015	ERM assessment against International Finance Cooperation (IFC) and Roundtable on Sustainable Palm Oil (RSPO) standards
October 2015	Creation of the forest nursery
November 2015	Biodiversity and Ecosystem Services Impact Assessment (BESIA) and Biodiversity Management Plan (BMP)
December 2015	Waste Management Plan (WMP) study
18 December 2015	Official ending date of the presence of the Ebola virus in Sierra Leone
February 2016	Construction of 2 health posts in Malen Chiefdom
March 2016	Starting of micro credit fund of 45 million Leones
April 2016	Commissioning of the mill
May 2016	Beginning of the harvesting in “Estate B”
May 2016	Construction of fish ponds and aquaculture projects
August 2016	Completion of reforestation projects of 8 000 trees

September 2016	Commissioning of Sieraphil fuel station in Sahn Malen
May 2017	ISO 14001:2004 certificate by Bureau Veritas
November 2017	Fruits trees reforestation project in 5 schools and Bee Hives in protected forests
March 2018	ISO 14001:2015 certificate by Bureau Veritas
July 2018	Beginning of the compliance to the principles and criteria's for RSPO
October 2018	Construction of the Sahn Malen community radio
December 2018	High Conservation Value (HCV) assessment by Montrose (Social Assessment)
February 2019	High Conservation Value (HCV) assessment by Montrose (Botanical, Herpetofauna, Riverine Assessment)
June 2019	Commissioning of the second steam boiler at the mill and additional CPO tanks

II. Economic performance in figures

1. Turnover and planted area by type of crop

Throughout the year, the total FFB delivered and processed at the mill was 108 634 tons delivered from SAC's plantation called "estates". During the peak, 1 472 tons of FFB was sold to Goldtree due to the mill capacity of 30 T/h being unable to process these fruits. The total production of FFB was 110 109 tons.

Oil palm	
Mature area	12 349 ha
Immature area	0 ha
Total	12 349 ha

The turnover of the Crude Palm Oil (CPO) was 13 478 K USD.

In 2019, SAC produced 24 297 tons of CPO.

2. Palm oil and palm kernel productions

The mill has a capacity of processing 30 tons of FFB per hour and was commissioned in April 2016 in the presence of the President of Sierra Leone, Ernest Bai Koroma. Power for the mill is provided by two steam boilers that runs on shell and fibre from the FFB. Steam is used for processing and to run a 1.2 MW powered turbine generator (OER CPO 2019: 22.37, OER PK 2019: 3.12).

3. Research and development projects

In the early part of 2019, SAC contracted world-renowned palm specialist consultant Thomas Fairhurst to provide input into Best Management Practices (BMP) at SAC. In December 2019, SAC engaged a researcher in charge of the creation of the Research and Development Department in 2020. The aim of this department will be the development of best management practices: assisted pollination, fertilizer regimes and all other agronomy aspects in order to improve yields.

SAC works in collaboration with the main universities of Sierra Leone in the agriculture, environmental and technical sectors. Partnerships are set up in the mean of internships supports for several months (including accommodation). SAC provides training opportunities with external institutions inside and outside the country (Cameroon, Nigeria, Liberia, Côte d'Ivoire, etc.) and collaborates with various universities laboratories for water and air analysis and services.

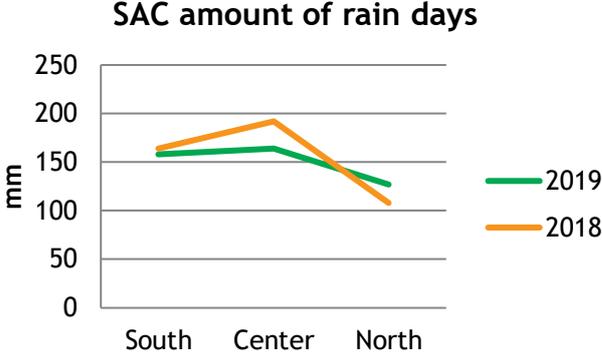
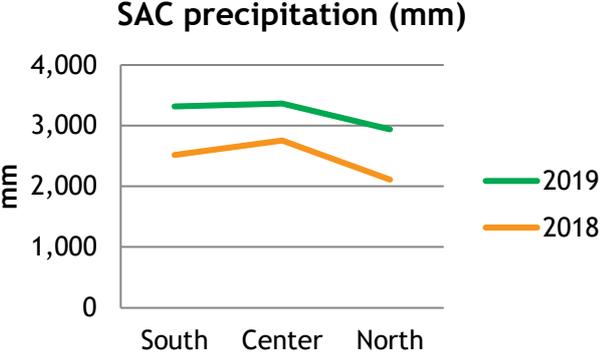
4. Impacts of climate change on operations

In 2019, the rainfall in the southern part of the plantation (Kotemahun) was 3 319 mm compared to the 8 years running average of 3 154 mm. The northern part of the plantation recorded 3 374 mm in 2019. In 2019, the water deficit was one of its highest. It reached minus



Trial for the application of effluents in the field

400 mm compared to minus 377 mm in 2018 and minus 243 mm in 2017. The main reason for the water deficit is poor distribution of the rainfall during the year.



5. Objectives and perspectives

The key aim and objective in 2019 is to generate the necessary revenues to support SAC’s operational and investment costs. This also includes the ISO 14001 audit to obtain the renewal of the certification and in 2019 SAC will be carrying out various environmental and social studies developing the path to RSPO compliance.

In addition, in 2019 SAC will create the R&D department to increase the production by using new techniques. The main operations will be fist data gathering, irrigation and assisted pollination. At the mill, 2019 will be the year of the starting of the extension of the factory from 30 T/h to 60 T/h.

III. Responsible governance

1. Governance structure and management approach

SAC is managed by a General Manager who oversees Departmental Managers that have the delegated authority to carry out their functions. Head of Departments (HOD) report directly to the General Manager. Consultation with stakeholders is organized at the departmental level with approval of the General Manager:

- Environmental Agency representatives will be managed by the Health, Safety and Environmental Manager;
- Land Owners representatives will be consulted by the Community Liaison Officer;
- District Authorities will be received by the General Manager;
- Workers safety issues will be managed by the Ministry of Labour and Social Security with the Mill manager and the Sustainability/HSE Manager;
- Police and Security issues will be addressed to the Security Manager;
- Labour Union will be received by the Human Resources Manager;
- Factory Inspectors will annually visits to the Mill Manager;
- Etc.

2. Policies, charters and code of conduct

SAC's activities are guided by the Socfin Group responsible management policy which is available online at www.socfin.com.

The Company has also developed the following policies that are displayed on notice boards for all employees. All these policies are annually described to all the working staff in the mean of minutes in local languages at the morning muster calls, also at the time of employment to all new employees and to all third parties engaged with SAC.

The Company has among others developed a HSE policy outlining its engagement in terms of environmental and social impacts and mitigation measures, safety of its employees and legal compliance. SAC Code of Employee & Business Conduct is disseminated by the Human Resources Manager and is communicated to all employees.

- Policy for Responsible Management;
- Environmental Policy;
- Contractor Policy;
- Supplier Policy;
- Replacement Policy;
- Sexual Harassment Policy;
- Human Right Policy;
- Equal Opportunities Policy;
- Reproductive Rights Policy;
- Special Labour Policy;
- Child Labour Policy;
- Health and Safety Policy;
- Code of Conduct;
- Code of Ethics.

3. Compliance with legal requirement

a. National environmental and social laws

SAC commits itself to respect environmental and social laws by following all national requirements, updating its permits and certificates and evaluating its legal compliance through an annual revision of its legal obligations.

SAC is fully compliant with the labour laws as stated by the Employer and Employee Act by the Government of Sierra Leone, the Government Gazette, Legislations, the Local Content Act, the Child Labour Act, the Collective Bargaining Agreement (CBA), the workers constitution, etc. as working documents to maintain standards.

The Company follows the requirement of the “Terms and Conditions on the issuance of an Environmental Impact Assessment (EIA) License” granted by the EPA-SL in pursuance of the Environment Protection Agency Act, 2008 (Section 24 (f), 29 and 30) as amended in 2010 and the Environmental Impact Assessment License Regulations, 2010.

The list below describes the permits and certificates obtained by the Company.

Valid permits	Issue date	Expiry date	Law	SAC Compliance
MoU - Memorandum of Understanding	24.09.12	/	Ministry of Finance and Economic Development	Compliant
EIA License (Environmental Impact Assessment License)	05.01.12	/	EPA-SL Act, 2008 amended in 2010	Compliant
EIA License (Annual Renewal)	19.01.13	18.01.19	EPA-SL Act, 2008 amended in 2010	Compliant
Certificate of Business Registration	01.09.10	/	The Business Registration Act, NO. 18/2007	Compliant
Sub Lease Agreement (A)	01.11.12	30.10.60	The Government of Sierra Leone	Compliant
Sub Lease Agreement (B)	01.10.13	30.10.62	The Government of Sierra Leone	Compliant
Sub Lease Agreement (C)	01.11.13	31.10.63	The Government of Sierra Leone	Compliant
Certificate of Registration of a Factory <ul style="list-style-type: none"> - Processing of Palm Fruits to Produce Palm Oil Kernels - Mechanical Workshop - Water Treatment Plan - Motor Vehicle Maintenance 	01.01.15	31.12.18	The Factory Act, NO. 3/1974	Compliant

b. Fight against child labour

The minimum legal age of employment in Sierra Leone is 18 years old (CBA and the Constitution of 1991). SAC complies with this legal requirement as it is clearly stated in the recruitment policy. Child labour is strictly forbidden; thus, a worker is engaged based on proof of age using biometric and non-biometric voter ID cards, drivers’ License, national ID card, etc. On a monthly basis, all ID cards are checked at the payment of salaries to avoid any non-compliance to this policy and identity fraud.

SAC shares its commitments and requirements to its supply chain by the communication of the Health, Safety and Environment (HSE) policy which is signed by all contractors and suppliers working with the Company. Negligence and non-compliance from third parties are reported to the General Manager and Sustainability/HSE Manager in charge of taking action (such as warning letter and action plans, rupture of contracts if non-compliance...). Records of misconduct are filed by the Sustainability/HSE Manager.

c. Fight against forced or compulsory labour

Contractors and suppliers must agree with the HSE Policy of the Company before starting any collaboration and by signing the HSE policy requires respect and compliance of environmental, occupational health and safety matters, no child labour, no forced labour as examples. This

policy and the Code of Conduct for employees are communicated to all employees via trainings and HSE minutes (section 5, chapter 7).

d. Fight against corruption

Evidence on SAC's fight against corruption can be observed in the transparency of its documents and the respect of the national requirements stated in the CBA. Minutes of meetings and all other type of communication are recorded to ensure traceability with SAC's interested parties. In addition, SAC develops policies to promote anti-corruption, transparent communication and open dialogue inside its activities.

e. Anti-competitive behaviour

SAC demands invoices for all its goods and services and pays the GST (Good and Services Tax) and WHT (Withholding Tax) taxes to ensure compliance with collection of taxation. SAC code of Employee and Business Conduct provides extensive guidance to employees on transparency and anti-competitive behaviour.

f. Social contributions

SAC follows the legal obligations to contribute to the social security system in place within the country. The National Social Security and Insurance Trust (NASSIT) requires 5% of the basic salary paid by the employee and in addition the Company contributes at his charge at 10% of the basic salary to NASSIT on a monthly basis for each employee.

In terms of occupational accidents, the Company has Workmen's Compensation insurance in order to comply with the Workman's Compensation Act by taking immediate responsibility for treatment, medication, aftercare and compensation in the event of a disability. In the event of an industrial accident involving a worker, compensation is made based on the reports made by medical practitioners and the Workman's Compensation insurance. On a quarterly basis, a report on work accidents is sent to the Environmental Protection Agency.

g. Compliance with labour laws (associations, unions)

SAC is fully compliant with the labour laws as developed by the Employer and Employee Act by the Government of Sierra Leone, the Government Gazette, Legislations, the Local Content Act, the Child Labour Act, the CBA, the workers constitution, etc.

The Company is complying with the Labour Laws of Sierra Leone in the area of training and awareness by partnering with ministries (MLSS, EPA-SL, etc.) and the development of procedures regularly updated with illustrative signs and diagrams for all employees.

As and when necessary, Labour Officers carry out audits on the Human Resources (HR) Department and by extension the Company for labour laws compliance. EPA-SL also audits the Company's operations on approved environmental compliance; hence the license is renewed every year.

4. Voluntary compliance with other standards

a. RSPO

In 2015, SAC commissioned “Environmental Resources Management” (ERM) to conduct a gap analysis assessment of its operations against the requirements of the IFC Performance Standards (2012), HSE Guidelines, RSPO Principles (2013) and the National Laws and Regulation.

In 2019, SAC has conducted three internal audits against the RSPO Principles and Criteria’s (2018) passing from 33% of compliance in February 2019 to 68% in December 2019. In February 2019, SAC engaged Montrose to conduct a High Conservation Value (HCV) assessment in order to develop management and monitoring plans.

As a result of these compliance efforts, SAC aims to be RSPO certified by the end of 2020.

In 2019, SAC has participated to the National Interpretation of the RSPO Principles and Criteria (2018) with the adherence to the TFA APOI Platform (The Tropical Forest Alliance - Africa Palm Oil Initiative).

b. ISO 14001

SAC is certified ISO 14001:2015 (Environmental management systems) since May 2017.

c. OHSAS 18001

In 2017, the Sustainability/HSE Manager was trained on OHSAS 18001 (Occupational Health and Safety Assessment Series) in order to start the implementation of this certification within the plantation.

However, due to the standardization of ISO norms, the Company will rather maintain ISO 14001:2015 and focus on RSPO which includes criteria for occupational health and safety.

d. High Carbon Stock approach (HCS)

In 2018, SAC has started its High Conservation Value (HCV) assessment.

As part of the HCS approach and Socfin Group Policy for Responsible Management, SAC follows a “no-deforestation” policy with a reforestation program supported by the Ministry of Agriculture, Forestry and Food Security (see chapter 6). This forestry programs (started in 2015) also follows the HCV Assessment recommendations regarding the International Union for Conservation of Nature (IUCN) type of trees.



15.09.2019 - SAC Reforestation Project (+/- 30 ha) at Kortumahun

e. Free, Prior and informed Consent (FPIC)

Prior to the establishment of the project, from January to June 2011, a public disclosure of the ESHIA has been conducted among all communities in order to describe the project and collect the free, prior and informed consent of all stakeholders. Minutes and attendance lists with signatures have been collected during these 6 months of meetings. This document has not been called an “FPIC” by the Sierra Leonean Environmental Consultancy Office in charge of the survey but a “Public Disclosure” as the term “FPIC” (Free Prior and Informed Consent) has been officialized by RSPO in their Principles and Criteria’s of 2013.

SAC also adheres to the Socfin Group policy for responsible management by committing to:

- Identifying and respecting the customary and individual rights of the local and indigenous communities through participative mapping;
- Ensuring that the laws and the international best practices in FPIC are implemented for all its operations.

The Company has established bottom up participation and consultation of stakeholders with an open dialogue channel based on internal and external grievances mechanisms, the availability of community liaison officers and social officers and monthly meetings with community representatives.



16.01.2020 - Stakeholder Meeting at Hongai Court Barray

In 2019, SAC has placed a particular attention on the implementation of recommendations developed by Earthworm Foundation (Ex-TFT) (visit conducted in December 2018) to improve the quality of communication between SAC and the 52 communities existing inside the concession. This action plan consisted in the improvement of its Grievance Mechanism procedure, the socialization of its FPIC procedure and other recommendations. In comparison to 2019, SAC has organized around 95 consultations with the communities against 48 in 2018.

5. Supply chain and traceability

a. Identification

SAC has a 100% traceability as its fresh fruit bunches production are sourced in its own plantation. SAC does not work with FFB smallholders as the area for oil palm planted by Socfin is adequate for the mill capacity.

SAC adheres to the Socfin Group responsible management policy by committing itself 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.

b. Transparency and fair procurement

Transparency is one of the objectives of the environmental policy signed by the General Manager. The General Manager uses memos to communicate to all staff as and when required. Maps, policies, etc. may be provided to interested parties if requested. At the end of every year, a summary of the development of the Company (social, environmental, infrastructure, Corporate Social Responsibilities, etc.) is prepared and provided to all Ministries as a general overview of SAC's operations.

SAC has developed a Supply Chain procedure (SOP_058) which describes the traceability of the fresh fruit bunches from their harvesting location (palm tree, GIS records, plot number, block number, etc.) until its reception at the mill, its verification through the quality control team and its processing in the factory. All records of FFB harvested and CPO produced is followed in the company database (WASP) which keeps traceability of all productions. Sales of CPO are also closely followed through the customer contracts, the sales details, the weights verification, the

refinery receipts and the customer meetings. SAC is registered in Palmtrace as required by RSPO. If certified RSPO, all productions will be recorded on this database.

c. Taking into account environmental and social aspects in the supply chain

All suppliers and contractors are informed on the environmental and social aspects through inductions and the signature of the Company policy.

Spontaneous audits can be conducted by SAC to its supply chain to ensure respect of the Company's requirements. Reports and action plans are developed after these audits. In case of registration of non-conformities, SAC may revoke the contract.

6. Clients' standards

SAC sells almost all of the Crude Palm Oil and palm kernels to local manufactures and some in the sub-region within the ECOWAS countries (Economic Community of West African States).

The clients' standards of SAC products (crude palm oil and palm kernels) are the ISO 14001 certificate, a report of analysis from independent inspectors, certificates of export and Economic Community of West African States (ECOWAS) certificate of origin.

7. Third Party Evaluations

In 2019, some 210 meetings have been organized between SAC and its external stakeholders with some 45 meetings held with Ministries (EPA-SL, MLSS, MAFFS (Ministry of Agriculture, Forestry and Food Security, State House, etc.), 95 meetings with the communities, 4 meetings with Non-Governmental Organization (NGO) (Maloa, Fian, Green Scenery, etc.), 26 with representatives of SAC supply chains and 40 with other stakeholders (vulnerable, media, civic...).

The evaluation of SAC consultation and conformity of its "Third Party" is one of the requirements of ISO 14001 and RSPO.

8. Complaints and Grievances

SAC determines procedures for the management of grievances which are divided into two categories "Internal" and "External". Internal grievances (raised by SAC employees) are managed by the Human Resource Department and the External grievances (raised by SAC third parties) are managed by the Community Liaison Department.

The grievance resolution mechanism contains 3 phases:

1. Effective management of public grievance that contains the details of the grievance (i.e. name of complainant, location, Community Liaison Officer (CLO) in charge of the case);
2. Resolution mechanisms with the investigation, timing of resolving, compensations details, etc.;
3. Action's effectiveness with the action taken to avoid occurrence, efficiency of the measure, etc.

9. Memberships and Associations

SAC is a member of the Commercial Agricultural Producers and Processors Association (CAPPA)¹. The General Manager of SAC was re-elected Chairman of CAPPA in 2019. The primary objective of this association is to act as the principal coordinating body representing all Commercial, Agricultural Producers and Processing companies in Sierra Leone and elsewhere to provide:

- A unified approach that positively influences the activities of all Sierra Leonean based agricultural producers, processing companies and rural communities;
- Improve the enabling environment for agricultural production in Sierra Leone and to initiate, foster and maintain a consultative, cooperative and communicative approach to dealing with issues with Government, Government institutions, Ministries and other relevant institutions.

The founding members of CAPPA are Miro Forestry Company, Socfin Agricultural Company, Sierra Land Development, Lion Mountains, Natural Habitats, Goldtree, Sunbird, Sierra Tropical and Carmanor.

10. Objectives and perspectives

SAC aims to produce and supply quality CPO through an environmentally and sustainable approach and market it locally and regionally. SAC is the largest producer of CPO in Sierra Leone and has already stimulated downstream value addition with the investment by a Sierra Leonean company of a new refinery in Freetown which was commissioned in August 2019.

SAC objective is to ensure its compliance to its environmental standards requirements (EPA, ISO 14001:2015) and be prepared for its RSPO certification. As mentioned in his Environmental Policy, one of the main objectives of the Company is to encourage and maintain fair and transparent communication and open dialogue with its interested parties by:

- Implementing an open, transparent and consultative grievance management mechanism;
- Ensuring representation of affected groups including women, local communities and foreign workers;
- Respecting the rights and consent of local communities in all its operations and supply chains;
- Consulting, collaborating and participating with all the relevant stakeholders (internal and externally);

Promoting equal opportunities with the communication and identification of relevant/affected local groups.

¹ www.cappasl.org

IV. Strong social commitment

1. Company’s social commitment

The Company is committed to ensure and encourage best management practices in terms of social security by respecting all national social laws and regulations applicable to its operations.

Some 3 287 people are engaged to support plantation operations, both direct workers and contractors with workers, SAC being one of the largest private employers in Sierra Leone.

2. Overall assessment of key social indicators

a. Staff

i. Workforce distribution by department

The number of direct employees at the 31st of December 2019 was 1 434 with the following distribution by department:

Department		Number of employees
General Management		13
Human Resources (+ teachers & others...)		6
Health center/Hospital/Clinic		1
Agro.	Oil palm	950
Industrial	Palm oil mill	153
	Palm kernel crushing plant	0
	Ateliers	86
	Workshop	93
Security		17
Finance and administration		85
Sust. Development	HSE/ quality/ safety/RSPO	30
Total		1 434

ii. Workforce distribution by category and gender

As an average in 2019, 246 women and 1 188 men were engaged as direct employees giving a ratio of 17% of female workers and 83% of male workers with the following distribution by department.

Department		Male	Female
General Management		12	1
Human Ressources (+ teachers & others...)		5	1
Health center/Hospital/Clinic		0	1
Agro.	Oil palm	745	205
Industrial	Palm oil mill	148	5
	Palm kernel crushing plant	0	0
	Ateliers	81	5
	Workshop	86	7
Security		17	0
Finance and administration		65	20
Sust. Development	HSE/ quality/ safety/RSPO	29	1
Purchase/sales		0	0
Total		1 188	246

An objective of SAC is to always bring equality and reduce the divide. However, traditionally many jobs are still classified on a gender basis by community people.

iii. Presentation of the different kind of employee's status and global distribution

Hiring is made upon job availability and is categorized into four separate forms:

- 1) Seasonal recruitment: when workers are engaged in seasonal work which is in the process of being transferred to a third-party contractor.
- 2) Casual recruitment: when workers are engaged for occasional jobs which is in the process of being transferred to a third-party contractor.
- 3) Permanent/fixed term recruitment: when adverts are placed inviting both intern and external candidates to apply and due process is followed in selecting the most qualified person/s. Succession planning strategy is considered to fill in such vacancies by promoting internally.
- 4) Contractor recruitment: when workers are engaged for specific tasks (i.e. pruning, slashing) according to the seasons and production period. This type of contract is punctual, it is signed/paid at each work request.

At the end of 2019, the total number of employees was 3 287 with 1 434 permanent employees (third category above described), 1 102 daily workers (first and second category above described) and 751 contractors (fourth category above described).

SAC employees and SAC's contractors benefit from working with a stable Company following the national laws of the country.

The payment of entitlements is prepared as followed:

- Salaries are paid monthly (never defaulted);
- NASSIT contributions are paid regularly and on time;

- PAYEE contributions are paid as legislated;
- End of service benefits are paid accordingly;
- Leave/holidays are observed (annual leave, maternity, UPA, etc.);
- Workman's compensation is paid when necessary.

iv. Integration of young people into the working world

To facilitate the integration of young people into the working world, SAC accepts trainees and interns recommended from universities and technical colleges.

b. Protection of employees

SAC is committed to protect its employees from workplace violence and harassment. The Company has a Code of Business and Employee Conduct that determines the roles and responsibilities of the employee and employer to provide clear guidance. All employees can and must report any incidence of such behaviors. In terms of communication, the Human Resources Department is in charge of the internal grievance mechanism to receive and resolve the complaints raised by an employee.

c. Internal complaints management

Internal grievances are the grievances raised by employees of all categories, permanent, fixed term, casual and seasonal. The internal grievance mechanism is overseen and managed by the Human Resources Department (Mende Speaking) which follows the Human Resources ethics and confidentiality process. Depending on the circumstance, the complainant may be accompanied by a companion to express its claim. As per stated in its procedure, SAC complaint management respects the anonymous of every person raising a claim.

The internal grievance resolution mechanism contains 3 phases:

1. Effective management of public grievance that contains the details of the grievance (i.e. name of complainant, location, CLO in charge of the case);
2. Resolution mechanisms with the investigation, timing of resolving, compensations detail, etc. if deemed necessary;
3. Action's effectiveness with the action taken to avoid occurrence, efficiency of the measure, etc.

In 2019, 1 internal grievance has been recorded which is still in progress of resolution.

d. Meeting the financial needs of employees

The Company respects the local minimum wage set up by the Government of Sierra Leone at 600 000 Leones in 2019. The Company has a minimum wage of 630 000 Leones. In addition, the revision of the basic minimum salary has been reviewed together with other aspects of employment benefits through the Collective Bargaining Agreement (CBA) with the Trade Council taking effect from January 2018.

SAC encourages employee's promotion via several performance initiatives such as the annual appraisals conducted by all managers, performance bonus', a year end Party and prizes and awards for best drivers, commitment to work, ISO recognition, compounds cleanliness competition, etc.

To meet the financial needs of employees, the Company puts in place a facility for employees to obtain loans which in 2019 has been channelled through two local banks, namely GT Bank and Rokel bank.

e. Human resources key figures

On the 1st January 2019, SAC employed 1 313 permanent staff against 1 434 on the 31st December 2019.

The maternity leave consists in 12 working weeks as agreed by CAPP in the last CBA agreement.

The leave entitlement consists of 22 working days for 1-5 years employment, 25 working days for 5-10 years employment and 29 days for more than 10 years employment as per the CBA agreement.

The overtime is 1.5 times the daily rate/basic on week days and 2 times daily rate/basic for Sundays and public holidays.

f. Training opportunity: employee's capacity building

The planning and organization of training/retraining is approved on a yearly basis at the Management Review by all managers. Each department must provide/review its training list according to the needs observed during the year, the type of operations and the level of competences.

The surveillance and management of this training calendar (support, attendance list, contents, evaluation of competences, etc.) is managed by the HSE department which prepares a yearly Training Calendar and reports on a monthly basis on the non-conformities observed against this planning.

In 2019, SAC has implemented an evaluation of competences which aims to conduct spontaneous controls of training competences on all operation sites on random workers. During this evaluation, a test is conducted with scores; in 2019, 143 persons have been controlled with 15 that failed their tests. These evaluations serve the Company to also evaluate their facilitator in charge of the training (tools used for the training, language, etc.).

For the year 2019, the table placed on chapter 7 "Training and Sensitization" page 34 gives the data for an average of 2 820 workers per month.

g. Membership and freedom of association of employees

SAC follows national labour laws and all other aspects such as worker organization and collective bargaining. Workers may be part of a union and there is a functional collective bargaining process and agreements in place. SAC and the workers union maintain an open dialog to address grievances.

All employees have the free right to be represented by the union of their choice; in 2019 the workforce opted to change from the NUFPAW union (National Union Forestry Plantation for Agricultural Worker) to the URP MICE union (Union of Railway Plantation Mineral/Mining Industrial Construction of Employee). The Ministry of Labour came to SAC in April 2019 to carry out an election of the two unions whereby the majority of workers opted for URP MICE.

3. Availability of infrastructure for employees

The SAC plantation has the particularity of being established around 52 community villages employing local people from communities to work in the plantation. Some 94% of the employees are therefore living in their own villages and have a short commute home and to work. Senior staff and mill workers are housed in company-provided accommodations called “compounds”.

SAC has built seven compounds for the housing of its employees.

a. In the villages

One of SAC commitments is the promotion of employing local people from surrounding communities to work inside the plantation. SAC employs the majority of its employees from Malen Chiefdom where they have their family houses.

i. Employees' personal utilities

SAC has seven compounds for the accommodation of its employees. These compounds are built according to the Socfin Group design set up. In 2019, an eighth compound was built in the north of the plantation. In 2019, SAC has renovated one of its employee compounds to maintain good standards of its housing.

Kitchens, toilets, showers and leisure facilities are provided. Electricity and water are supplied in these compounds. Each compound has an elected chairman in charge to manage and report all issues raised by the occupants to the management. Monthly meetings are organized with chairman in order to ensure open dialogue.

ii. Leisure facilities

All compounds have their particularities and differences such as:

- Some of the leisure facilities: football field, basketball fields, volleyball field;
- Green spaces and personal gardens;
- Gathering places: canteen, club house, guest house;
- Waste management: sorting and cleaning of the waste, collection of waste, etc.

In addition to these compounds, SAC has built an entertainment centre called the “canteen” composed of a volleyball field, satellite reception with two televisions, music and 24-hour power. This compound was built in 2015 and is 218 m² in size.

As part of the leisure activities, employees enjoy an “End of the Year Party” which reunites all employees with food and refreshments, site attractions and entertainment (budget of over 21 000 USD in 2019).

b. Investments in infrastructure

The investments that have been made in the compounds in 2019 for a cost of 73 051 USD are mainly the purchase and supply of mattresses, the maintenance and repairs of housing such as painting, air conditioning maintenance, water and electrical appliances repairs, the renovation of the Operators quarters and the construction of Jao Compound in the north.

c. Mobility

One of the strengths of the Company is to have its employees living in the villages around the plantation which reduces their commute. In average, the minimum distance that an employee will have between his village and his work place is about 1 - 2 km and the maximum distance will be 3 km. In 2019 SAC has introduced a daily transport allowance in accordance to the amount given in the CBA agreement to each employee to assist in their movements.

Means of transport available for the employees are cars, minivans, bus, bikes and trucks, however more than 70% of the employees are walking to reach their workplace. When provided, transport is managed at the departmental level for specific functions such as spraying, firefighting (dry season), waste collection (tricycle), road maintenance or for particular departments such as the employees for the mill that are housed in the Y-Junction and transported with a minivan or bus.

SAC provides senior staff Company motor vehicles or motorbikes to carry out their duties and work requirements, whilst supervisors and staff needing mobility for their work are provided local TVS motorbikes to carry out their duties. These bikes are sold on a “Hire Purchase Scheme” over 3 1/2 years and a usage monthly allowance is paid to them together with an allocation of fuel. The contract that links the employer and the employee states that after a contracted period the bikes become the property of the employee.

4. Security of people and property

SAC has a “third party” security service called Sharp Security Services operating around the plantation. This security service is in place to ensure the security of FFB, company property and its employees and families. Over 300 people on a monthly basis are employed by this company. The Sharp Security’s manager oversees and has the responsibility to respect the company policies in term of trainings, personal protective equipment supply, road safety, emergency procedures, restricted access, etc.

In addition, in 2015, the Company has created a Security Department managed by a Security Manager and 16 supervisors that oversee security of the plantation and activities of the private security firm. This department is in charge of ensuring trainings, inductions on SAC policies (see chapter 3.2) and respect of SAC procedures from Sharp Security.

Farm guards selected by the community villages are also posted to report fires and fruit theft around the plantation.

5. Health: a driving force for development

a. Health policy

SAC health policy aims to promote a safe and healthy workplace to all its employees and their families by:

- Recognizing and respecting the rights of all workers and local communities;
- Preventing and reducing work accidents;
- Informing employees on the risks of accidents and environmental degradation;
- Displaying HSE Notice Boards at every workplace with the identification of hazards, precautions, prohibition signs, emergency services and situations, etc.;

- Sensitizing employees on their social and environmental responsibilities via trainings, awareness, sensitizations, minutes and inductions.

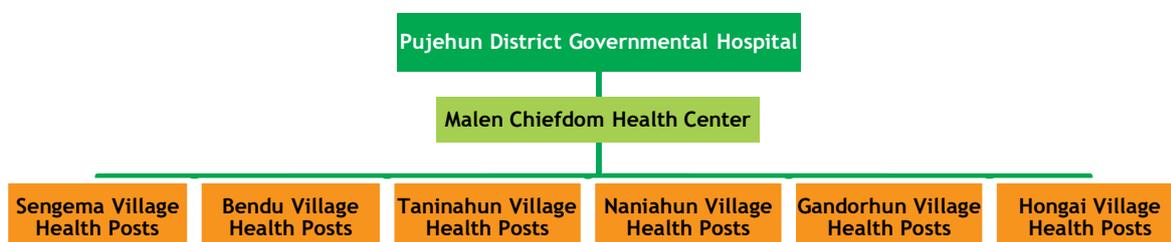
The Company provides access to medical facilities for employees and their dependents. SAC provides an ambulance service to all workers and the community in the concession. Permanent employees are covered by the Company for all medical costs whilst all other categories of workers are fully covered for work accidents.

b. Staff and health infrastructure

The Company supports medical services costs for all its permanent staff and their dependents (3 dependents below 18 years old and the husband or wife), and emergency services (ambulance, emergency line, firefighting team, first aid team, evacuation procedures, etc.).

In the South, the health infrastructure available to support the medical care of the employees is the health centre of Malen Chiefdom managed by a full-time Health Officer and nursing staff. In the North, the health infrastructures available are the health posts of Taninahun, Bendu and Sengema.

The health facilities are managed by the Ministry of Health and Sanitation (MoHS) headed by the District Medical Officer (DMO) of Pujehun. SAC has provided solar lighting to all external clinics and provides 24 hours power to the clinic in Sahn Malen. The HSE department meets on a regular basis with the MoHS to discuss about health topics such as children vaccination, malaria, HIV-Aids, diarrhea, Ebola and other medical services. The graph below summarizes the three levels of health facilities:



SAC does not manage these infrastructures but assists in their rehabilitation and construction (to reduce the distance from some villages), assists the nursing staff in the administration and medical files, provides water and electricity 24 h/day and prepares the payment of the consultation and drugs prescribed to Socfin staff and families.

SAC has 1 ambulance.

In 2019, the total expense on health care and infrastructures was 121 167 USD, these costs being energy supply, rehabilitation of buildings, staff assistance, etc.

c. Meeting the financial needs of employees (medical loans)

The Company has set up an agreement with two banks to enable staff to obtain a loan facility. In emergency cases the Company will provide a soft loan or advance on salary.

d. Prevention, detection and treatment of diseases

The prevention strategies and treatments implemented regarding health on the plantation are developed at two levels. The first level is the medical staff that organizes their prevention plan against Human Immunodeficiency Virus (HIV), children disease, vaccination, malaria, etc. For example, every year at the same period, the governmental health posts and centre are supplied with vaccines and start their campaign of vaccination of children less than 5 years of age.

The second level is the sensitization organized by the HSE/Sustainability department regarding health and environmental issues. In 2014-2015, the Company supported the Ebola prevention with a budget of 454 400 USD. Every 1st December, SAC puts in place its prevention campaign on HIV. Sensitizations, jingles and radio messages are carried out with a condom distribution to the workers and communities. Since 2018, the campaign is prepared in collaboration with the Pujehun District Council and the National HIV/AIDS Secretariat where the Health Centres are supplied with condoms and posters.



01.12.2018 - HIV Commemoration: Partnership SAC - EYES - MoHS

e. Family planning

Family planning is organized at the level of the health centres/posts and villages (i.e. women associations in Sinjo village). Members of the Sahn health team go to the primary and secondary schools in Sahn to raise awareness on family planning including teenage pregnancy, HIV/sexually transmitted diseases and all contraceptive and family planning techniques available at all clinics in Malen. Free contraceptives including condoms, pills, IUDs, implants and injectable contraceptives are available at all clinics in the chiefdom.

f. Data collection

The medical statistics are owned and managed by the Ministry of Health and Sanitation. However, in a spirit of improvement on medical statistics, since 2018, SAC employed a Medical Administrator as a consultant to oversee all medical cares provided to the Company's employees.

g. Preparedness for emergency situations

The Company provides one person who is in charge of the emergency services (ambulance and calls), the registration of the bills, the contact with the doctors in clinics and the medical archives. One ambulance is provided and run by the Company and is at the disposal of the entire Chiefdom in order to offer a rapid medical service to the community people and also to provide transport means in case of emergency or transfer of patients to the District Governmental Hospital for medium and major cases (surgery, etc.).

Employees and communities are well aware of the Company' emergency procedures as there is an emergency line available 24 h/day, electricity provided at the health centre 24 h/day and ambulance services 24 h/day.

On an annual basis, employees are reminded of the emergency services during the HSE minutes and also at the time of the employment of a new employee.

A good example of the efficiency of SAC emergency services was the Ebola experience where the success of the organization and the reactivity helped to follow all Ebola suspicious cases and become the first District declared Ebola free in Sierra Leone.

6. Supporting education and training

a. Education policy

The Company supports the Government school system through the development of a specific function inside the Community Liaison Department in charge of the education programs and school communication. The SAC employee sitting at this function is the former headmaster of the Roman Catholic (RC) primary school of Sahn Malen which makes him well known and respected among the communities. Due to his personal experience, he also has a particular knowledge on the issues in terms of education and provides SAC with a pertinent action program to be implemented.

In 2019, 55 429 USD has been spent for education programs such as:

- Purchase of text books;
- Nature Club to sensitize children of primary and secondary schools about environmental and waste issues (waste management, road safety, water and sanitation, protection of the forests, HIV, Malaria, Ebola, etc.);
- Fruit Forestry project (5 000 fruit trees) with the establishment of nurseries in five primary schools to sensitize the young generation on the benefits and management of fruit tree planting. In this project, bye-laws with local communities, trainings and sensitizations are provided to the members of the committees and schools in charge of the nursery;
- Rehabilitation of teacher's accommodation quarters (water wells, rooms, etc.);
- Bee hives project (in five protected forests) that aims to sensitize children on the benefits and management of bee hives;
- Meetings and invitation of several ministries to support sensitization programs and actions (Ministry of Water Resources (MWR), MAFFS, National HIV/AIDS Secretariat, etc.);
- Purchase and construction of benches, desks, chairs, cupboards, tables and office table, etc.;
- Construction of toilets and football fields in schools;
- Support to development projects and school programs such as World Teacher Day, June 16, sport competitions and interschool kid clubs, cultural shows, remedial classes for Basic Education Certificate Examination (BECE), summer school debate, Cross Country, health sensitizations, etc.;
- Rehabilitation and construction of three new schools (Sinjo, Bendu, Maly and Kotumahun);
- Provision of transport and feeding for BECE students;

- Payment of stipends to teachers and security guards;
- Provision of scholarships for students who attain an aggregate score of 25 or below.

b. Infrastructure and staff

The concession counts 5 private schools and 22 public schools with 2 nursery schools (public), 23 primary schools (private/public) and 2 secondary schools (private/public). The average ratio of students per teacher is 39.84.

There are 168 students and 6 teachers in the 2 nursery schools, 4 732 students for 112 teachers in the 23 primary schools and 658 students with 22 teachers in the 2 secondary schools.

On a yearly basis, SAC provides assistance and financial support to non-registered teachers, security guards and scholarships. In 2019, the amount allocated for stipend and payment of security was over 7 000 USD for teachers and security guards from January to December.

In 2019, one new school has been built and handed over by SAC at the village of Kortumahun providing suitable facilities for children to learn. The handover ceremony of this school has been conducted in the presence of the Ministry of Education in charge of the official approval of the school's designs and locations. This school has been also visited by the EPA at several times which has provided recommendations such as the building of water well and toilets for the pupils which are followed by SAC.

The building (design, location, size, classrooms, etc.) of schools is approved by the Government. All new schools built by SAC have four classrooms, an office for the Headmaster, a store, toilets and a water well. The budget for the construction of a school is 16 000 USD, a well 1 600 USD and a block of four toilets 1 800 USD.



New school building constructed by SAC in 2019 in Kotemahn village

c. Financial support and donations

i. Student loans

A significant improvement in terms of education is the scholarship scheme developed to assist hard working pupils of Malen Junior Secondary School (MJSS) that pass their BECE exams into senior school. As MJSS is the only secondary school in the chiefdom, the Company attaches a

particular importance to support its students and assist them to pass their examination for the senior school.

The program was set up whereby students achieving an aggregate of 30 or less would qualify for a scholarship which has since been moved to 25 in 2018. Since the beginning of this program in 2013, the level of success of pupils has drastically increased (table below).



13.09.2019 - students and their parents receiving scholarship from SAC at the BECE award ceremony

Scholarship Details 2013-2018			
Year	Student	Promotion	Budget
2013/14	1 student passed		300 000 Le
2014/15	44 students passed		300 000 Le
		1 student promoted to SS1	300 000 Le
2015/16	29 students passed		300 000 Le
		1 student promoted to SS1	300 000 Le
2016/17	23 students passed		300 000 Le
		10 students promoted to SS1	300 000 Le
		21 students promoted to SS2	300 000 Le
2017/18	32 students passed		500 000 Le
		6 students promoted to SS1	500 000 Le
		25 students promoted to SS2	500 000 Le
		28 students promoted to SS3	500 000 Le
2018/19	31 students passed		
		3 passed	500 000 Le
		3 students promoted to SS1	500 000 Le
		25 students promoted to SS2	500 000 Le
2019/20	31 students passed		
		3 students promoted to SS1	1 500 000 Le
		3 students promoted to SS2	1 500 000 Le
		25 students promoted to SS3	12 500 000 Le
Total spent in 2019 - 31 000 000 Leones (Le) - 3 263 USD (average exchange rate)			

ii. School transport

SAC always participates in feeding and transporting students at examination time, for inter school galas, for social functions and other school related activities in and out of the chiefdom. In 2019, a contribution of 940 USD was allocated to the transport and feeding of teachers and pupils during National Primary School Exams (NPSE) and BECE.

7. Micro-projects

At the end of 2019, SAC had increased the fund through contribution and interest to a portfolio of 220 million Leones (23 160 USD) in the support of micro-credits. The project has its own bank account. The micro credit project has proved extremely successful and has been running for over three years with zero defaults to date. The interest rate is 10% per annum. Local traders are extremely happy with the project which allows them to develop their businesses.



2017-2018 - Microcredits reception

8. Perspectives and performance

For 2020, SAC has set up several objectives in terms of social commitment towards its employees in various areas.

Improvements will be observed through the medical care quality at the health facilities. To address a feedback from by its workers, SAC has employed a Medical Administrator (M. A.) in charge of following the medical care services; their efficiency, reliability and quality. The M. A. will engage various health centres and hospitals in the country via contracts and agreements to ensure efficient management and follow-up of the employees in case of referrals to other medical facilities and therefore to ensure quality medical coverage.

Through meetings and regular engagement, the objective of the M. A. will be to build a strong and continuous relationships with the clinics and pharmacies outside the concession (Bo, Pujehun, Kenema, Freetown...) and to be able to provide a clear description to SAC employees about their cares and treatments.

In addition, the Medical Administrator will create medical procedures, memos and trainings/sensitization on their contents to ensure all the working staff has understood these procedures. As part of SAC training process, interviews and evaluation of competences will be organized among the employees to verify their level of knowledge on these procedures to avoid misunderstandings and issues.

V. Ensuring employee safety

1. Safety management system

The safety management system has highlighted the main areas of risks and impacts on which action plan and targets are established and monitored. On a monthly basis, statistics are interpreted and issues must be identified and explained by the department concerned in order to develop mitigation measures. As per legal requirements, all accidents and statistics reports are communicated to the relevant ministries to ensure transparency.

The Company's occupational health and safety management system aims to present the roles and responsibilities attached to the health and safety of the employee. This Occupational Health and Safety (OH&S) management system comprised a management plan with the definition of objectives, procedures and monitoring reports that are needed to reach and comply with the statements of the health and safety policy.

SAC OH&S management system and plan are a legal requirement monitored by the EPA -SL on a quarterly basis and by the MLSS on an annual basis. During these audits, the officers will assess the Personal Protective Equipment (PPE) requirements, training and education programs, complaints mechanisms, etc.

2. Occupational health and safety policy

The objectives of the Company are reviewed annually by managers and stated in the health and safety policy signed by the General Manager (last revision: 15.10.2018). For 2019, SAC engages itself to promote a safe and healthy workplace by:

- Recognizing and respecting the rights of all workers and local communities;
- Preventing and reducing work accidents;
- Informing the employees on the risks of accidents and environmental degradation;
- Displaying HSE notice boards at all workplaces with the identification of:
 - Hazards, precautions and prohibition signs;
 - Emergency services, situations and plan and work-related instructions.
- Supporting and encouraging its suppliers and contractors to implement this policy;
- Sensitizing the employees on their social and environmental responsibilities via:
 - Training of employees to prevent accidents and pollution;
 - Thursdays "HSE Minutes" on various safety topics (chapter 5, section 7).

3. Occupational health and safety committees

To ensure employee safety, SAC has created since 2012 a HSE department which is managed by a full-time expatriate. This department is responsible for the establishment and implementation of safety procedures, the surveillance of workers accidents, the communication with the working staff about HSE topics, etc.

The HSE department is composed of eight employees with the following functions related to occupational health and safety:

- 1) Health and Safety Officer: In charge of the surveillance and compliance of the Company' safety policies. Cases of non-compliance are recorded, reported to the managers with the development of an agreed action plan. He is the controller of the

emergency procedure by testing the efficiency of the response situations, the reactivity and awareness of the employee and the availability of emergency plans;

- 2) Health and Safety Imputer: In charge of the statistics development and interpretation. Offsets to targets are notified to managers with the establishment of an action plan to readjust the results and respect the targets. He provides all managers with the work accidents statistics and medical data;
- 3) Supply Assistant: Controller of the personal protective equipment provided to employees. He must ensure that the procedure on supply is respected (timing, quantities, records, etc.) and that appropriate equipment is provided for each function.

In addition, in 2018, a “Safety Committee” has been created in regards with RSPO principles and Criteria’s requirements. This committee is composed by 11 representatives on health and safety for each department. They all have been trained on first aid by the Red Cross. This committee meets on a monthly basis to discuss safety concerns raised by their departmental workers and to give a feedback on the conformities/assimilation to the procedures and trainings.

4. Risk analysis (realized this year or updated)

The risk analysis of the Company has been prepared by the HSE/Sustainability Manager and uses the following analytical methodology.

Health and Safety hazard identification / Risk Assessment					
Severity			Likelihood		
1	Insignificant	No injuries, low financial loss, negligible environmental impact	A	Almost certain	Is expected to occur in most circumstances
2	Minor	First aid treatment, on-site release immediately contained, medium financial loss, small impact area	B	Likely	Will probably occur in most circumstances
3	Moderate	Medical treatment required, on-site release contained with outside assistance, high financial loss	C	Possible	Might occur at some time
4	Major	Extensive injuries, delay to construction, off-site release with no detrimental effects, major financial loss	D	Unlikely	Could occur at some time
5	Catastrophic	Death, toxic release off-site with detrimental effect, huge financial loss	E	Rare	May occur only in exceptional circumstances

The risk analysis is reviewed on an annual basis to ensure all operations have been taken in account. This analysis details potential occupational hazards and injuries linked to each of the Company’s operations. Prevention measures are adopted to avoid these risks with the development of a Personal Protective Equipment (PPE) database that aims to support each manager in their purchase of preventive equipment for their workers. Trainings and minutes on health and safety are organized for workers in all departments to ensure that they are informed on the risks linked to their functions and the type of prevention the company puts in place to protect them.

5. Programs and plans

The Company has defined an “emergency response and preparedness plan” based on the accidental situations that have been determined for all activities in the plantation. The list of accidental situations (and their responses) is reviewed on an annual basis according to the occurrence of potential accidents, the creation of new functions, the issues raised by employees during emergency exercises and the efficiency of the mitigation measures.

The emergency response and preparedness plan defines two types of measures, first the prevention means put in place to avoid that potential accidents occur, and secondly the response action and related services if it occurs. All emergency situations are tested to verify the efficiency of the response and to ensure employees are prepared to face an accident. For instance, emergency exercises are organized periodically at all workplaces to test the efficiency of the response plan and the awareness of the workers. During these exercises, 10 minutes are allocated for questions, comments, observations and keys for improvement.

Emergency services are composed of the first-aid team (trained by Sierra Leone Red Cross), the firefighting team (equipment controlled by the National Fire Force), the hazardous waste management (support from Bo District), etc.

6. Achievements

Since 2018, SAC has developed an action plan on the improvement of the noise level at the mill (earmuffs, silencer) due to the commissioning of the second boiler in 2019, and a silencer has been purchased to reduce the level of noise in the mill.

The achievements in terms of employee safety could firstly be observed in the reduction of complaints raised by the employee on health and safety issues. Secondly, by the development of health and safety procedures to guide employers and employees on the rules to follow to promote safety at the workplace. Thirdly, the development of medical statistics allows understanding of the circumstances of accidental situations and therefore to develop prevention measures against this type of situation such as the purchase of personal protective equipment (PPE) or the organization of training to the employees.

Finally, the development of HSE minutes on Thursdays was encouraging in 2019 with 1 936 minutes organized and 29 967 workers sensitized (chapter 5, section 7). SAC wishes to continue its improvement in terms of communication with its working staff to ensure issues raised are taken in account by management and reduce the amount of non-conformities (32 HSE minutes not done as planned).

7. Training and sensitization

The planning and organization of training/retraining is approved on a yearly basis at the management review by all managers. Each department must provide/review its training list according to the needs observed during the year, the type of operations and the level of competences.

The surveillance and management of this training calendar (support, attendance list, contents, evaluation of competences, etc.) is managed by the HSE department which prepares a yearly training calendar and reports on a monthly basis on the non-conformities observed against this planning.

Every month, at the “Safety Committee” meetings (chapter 3), the compliance to the training calendar is assessed in each department. Concerns raised by the employees after HSE minutes and trainings are reported for development of solutions. Below is a list of complaints raised by workers and resolved in 2019. At some meetings, a head of department might be invited to provide more information on some labour questions in order for the Safety Committee to be able to answer to the workers questions (medical procedure, employment conditions...):

- Replacement of notice boards;
- Workers safety issues (PPE quality, PPE supply program, helmets for bikes...);
- General questions on diseases (diabetes, gonorrhoea, hepatitis...);
- Cleaning and slashing of the canteen (workers entertainment center);
- Provision of fire equipment in compounds;
- Information on Community Development Action Plan and CSR’s;
- Waste pictures displayed on waste bins for illiterate staff;
- Placement of emergency meeting points and provision of fire alarms;
- Work orders preparation (fence closing, repair of infrastructures, showers for sprayers, etc.);
- Road safety issues (dust emission, road accidents...).

To improve the employee performance and professional development, SAC regularly engages external facilitators to conduct trainings on various competencies with examinations and issuance of certificates. In 2018-9, two employees have been sent to Cameroon to be trained by “The Center for Social Excellence” - set up by Earthworm Foundation (Ex-TFT), 17 employees were certified by the Red Cross on first aid training, and two employees were trained by the Environmental Protection Agency on Air Conditioning.

For the year 2019, the table below gives the data for an average of 2 820 workers per month. **Inductions** are given at hiring by the HSE department and describe the company’s policies, department functions and emergency services. **HSE minutes** are 10 minutes of safety talks organized on Thursdays with a short time for the collection of issues and suggestions raised by employees on the topic discussed. **Training (Calendar)** are the trainings listed in the Training Calendar which are divided in three categories “departmental training”, the “mandatory competency trainings” and “trainings linked to environmental significant aspects”. The **other trainings** are the sensitizations and trainings not planned that have been done within the year.

	Inductions	HSE minutes	Trainings (Calendar)	Trainings (Other)
Total	51	1 936	765	69
Duration	50 minutes	10 minutes	1 hour minimum	1 hour minimum
Total duration	2 550 minutes	19 360 minutes	765 hours (minimum)	69 hours (minimum)
Total employees	51	29 967	19 261	1 525

8. Medical check-up

All new permanent staff entering into the Company are required to have a medical check-up. Annual medical check-ups are also put in place for drivers to ensure their eye sight is in good order to drive.

9. Monitoring

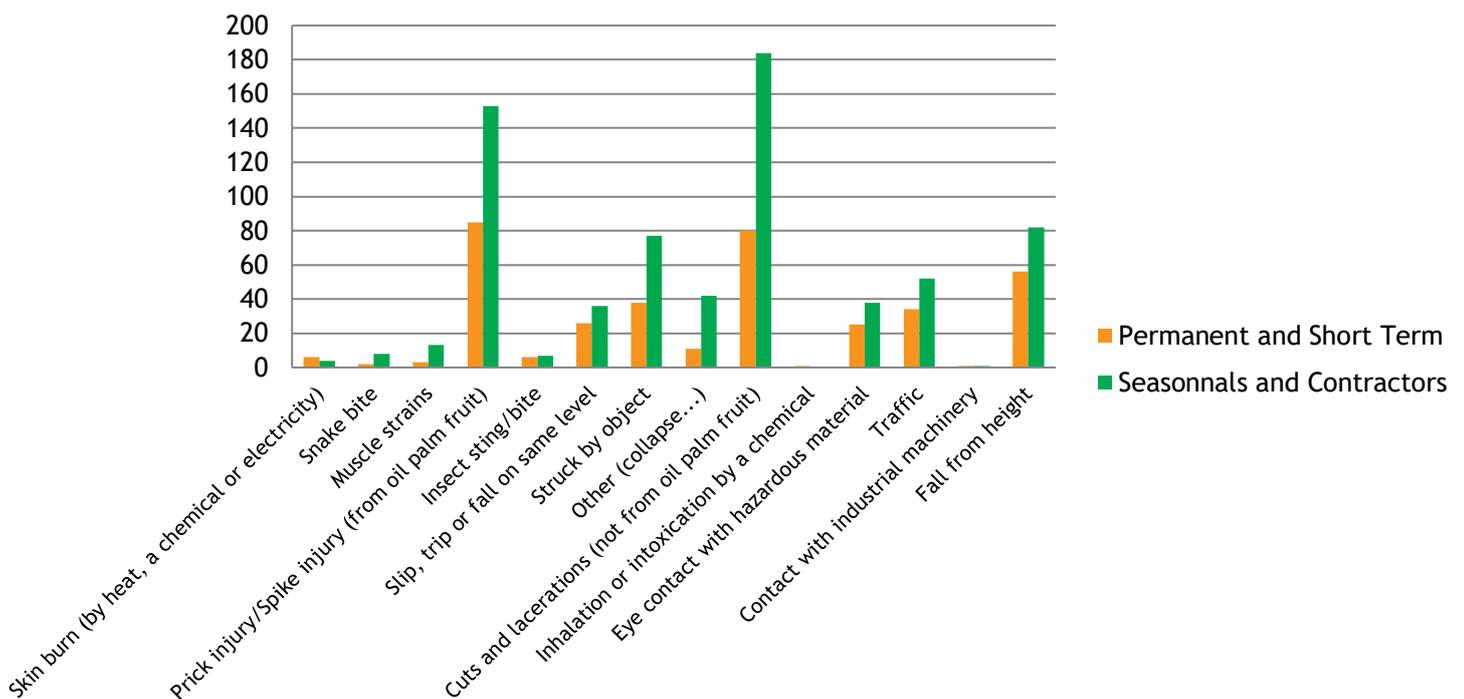
Statistics are developed in order to calculate the amount of work accidents, to register the frequency of injuries relative to the total time worked, to understand the circumstances of the accidents and to put in place mitigation measures to prevent these accidents. These statistics are recorded and developed by the HSE department and the Medical Administrator in charge of the reporting to the Head of Department (HoD) and the implementation of action plans.

10. Number of accidents (loss greater than one day)

SAC records the number of accidents among workers, especially accidents that could result in lost work time, different levels of disability, or fatalities.

The number of accidents is categorized by nature of accident as detailed in the graph below for 2019. Statistics are developed on a monthly basis and submitted to managers in charge of the development of action plans (budget, personal protective equipment, collective protective equipment, mitigation measures, etc.). The communication to the working staff on the work accidents statistics is done on notice boards displayed at all workplaces.

SAC Work Accidents 2019



11. Accident rate per 200 000 hours of work

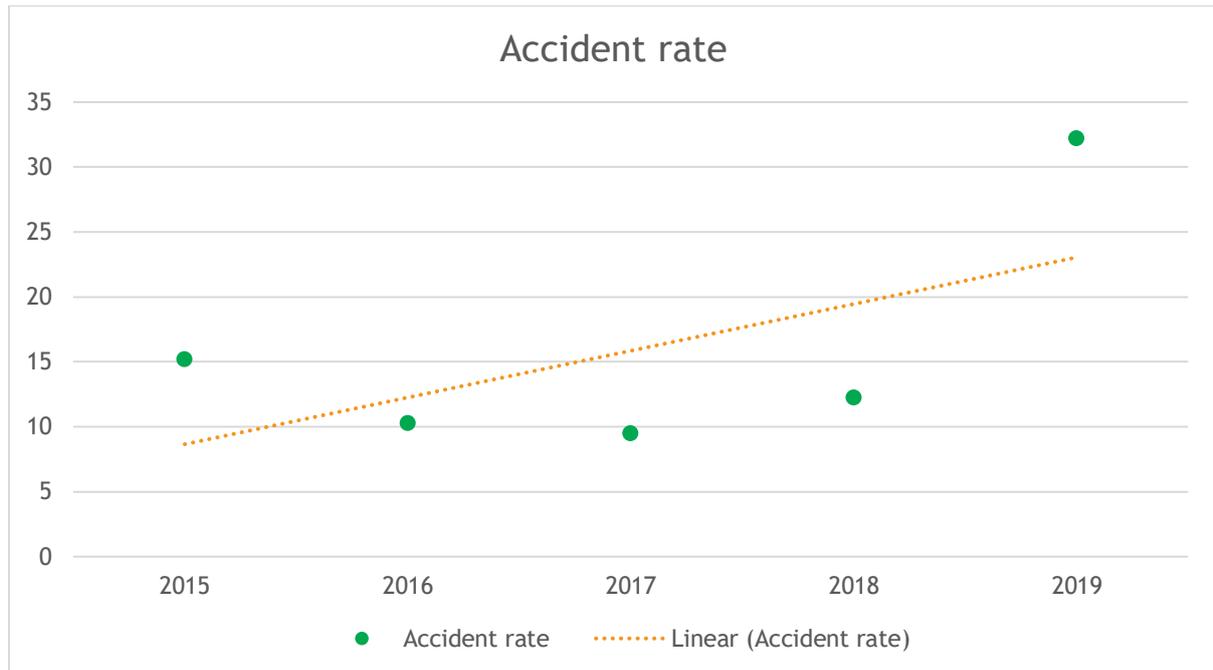
The accident rate was 32.17 workers recorded for every 200 000 hours of work. An increase of the rate of accidents was observed due to the mill and the plantation being in full production (milling increase, harvesting, transportation of fruits, loading operations...). The main increase of work accidents is observed in the category of “Prick injury/Spike injury (2018: 21 and 2019: 238) (from oil palm fruit)” which is the result of the trees’ now taller which reaches the human face leading to accidents during harvesting, pruning and transports of fruits in the field. However, this rate increase is also due to the improvement of SAC record of accidents and mitigation measures.

12. The safety of people in the supply chain

Suppliers and contractors employed by the Company are required to sign a contract which includes the occupational health and safety requirements of the Company (wearing of PPE, respect of minimum age of employment, respect of waste management, trainings of workers, etc.).

13. Evolution over time

In 2019, the total amount of work accident was 1 071 for an average of 2 820 workers per month. The graph below shows the evolution over time of this accident rate.



14. Objective for the next year

For 2020, SAC wishes to improve its occupational health and safety statistics by:

- 1) Concentrating on the source of the work accidents in order to reduce the accident rate;
- 2) Improving the involvement of all managers to develop mitigation measures against accidents reported;
- 3) Continual opening dialogue with Ministry of Labour and Social Security and Environmental Protection Agency - SL on the reporting of accidents.

VI. Management of natural resources

1. Environmental management system

The purpose of ISO 14001 is to provide a framework to protect the environment as it specifies requirements that enable SAC to achieve the intended outcomes it sets for its Environmental Management System (EMS).

To support its EMS, the Company has defined an environmental assessment for all its scope of activities in order to determine its environmental impacts and environmental significant aspects. To address its impacts, the Company's activities are divided in processes managed by pilots for whose roles and responsibilities have been defined and approved by the General Manager. Every year, an environmental management program is set up, revised, readjusted and approved in a management review with the establishment of targets and objectives to be reached within an agreed timeline. These objectives are communicated to all working staff and interested parties through the health and safety policy, procedures and trainings.

2. Status of certifications in progress

The Company is certified ISO 14001:2015 and has started the documentation and action plan for the RSPO certification.

3. Policies

a. Water



Fisherman on the Malen River

The impacts of the Company's activities on the water (water consumption and waste water generation) are assessed in the EMS and considered as Environmental Significant Aspects (ESA) also specified in the Company environmental policy. The water source that is significantly affected by the withdrawal of water is Malen river with the water abstraction from the mill.

Objectives and targets have been established on the water consumption and the control of water pollution in order to continuously monitor the impacts of the company's activities:

- Total volume of water withdrawn from ground water and surface water for the company's activities is measured monthly with water meters. SAC has seven boreholes located at the Mill (Kortumahun), the Hill Station and offices (Sahn Malen), the compounds and Mixing centers (Jao and Naniahun). Water consumption data is communicated on a quarterly basis to the EPA-SL and every year to the Ministry of Water Resources. SAC follows the national requirements for the payment and use of water ("Water Bills");
- Targets on water consumption are established for the Company's activities and for domestic purpose. Records are monitored and offsets are set as non-conformities with the development of action plans and mitigation measures;
- Rainwater is measured for statistics but not directly collected nor stored by the Company;
- Total volume of effluent treated in the lagoons is measured and monthly monitored to ensure efficiency of the effluent ponds;
- Water quality control is conducted on a quarterly basis and sent to the EPA-SL in monitoring reports.

The water sources that are affected by the withdrawal of water is the Malen river located at the extreme South of the plantation where the mill is located. All other operation sites where the water is consumed are using boreholes:

- Herbicides mixing centres;
- Washing Areas and workshops;
- Compounds and offices;
- Etc.

In 2019, the Government appointed the National Water Resources Management Agency to oversee the water control and management in the Country. In respect to this new requirement, SAC is sending a quarterly report on its water consumption and pays water bills based on this consumption. The graph bellows summarizes the report sent to the Agency.

b. Soil protection

The impacts of the Company's activities on the soil have been evaluated for all the Company's activities and defined with an action plan. The strategy of the Company for the soil protection consists in:

- 1) Ensuring storage procedures against leakages are respected (retention tanks to avoid leakages, spillage procedure, storage of hazardous materials in closed area with no contact with the soil, etc.);
- 2) Waste management of hazardous products (collection of spills, disposal in a closed area, monitoring of waste with reporting on non-conformities, etc.);
- 3) Training on soil pollution to all people having a function linked to hazardous products (handling, storage, mechanics, electricians, fuel supply staff, store keepers, etc.);
- 4) Sampling of soil for analysis. SAC follows the EPA-SL Act (2010) which requires that soil analysis must be conducted every year;
- 5) Development of erosion control techniques (cover crop broadcasting between trees, vetiver planted in slopes, drains and culverts placed on road to prevent flooding, rock barriers, etc.);

- 6) Consideration of erosion control in the planting method and orientation of palm oil trees. The topography is undulating with little slope inclinations and the soil type is predominantly lateritic including stones and rocks that provide high eroding resistance to surface water.

c. Waste management

The Company's strategy for managing waste is summarized in the Waste Management Plan (WMP) that lists the type of waste generated by SAC' operations, the quantities, the collection means, the temporary disposal methods and their final disposal method with the name and certificate of the recyclers. This plan contains the different category of waste (i.e. liquid and solid waste, hazardous and non-hazardous, waste water, etc.). The WMP must be sent to the EPA-SL and approved by them during their annual audit.

Waste generated by the Company is monitored on stock cards until collection by the recyclers. Monitoring of the quantities is recorded in the HSE monthly report in order to keep tractability of all waste. The recyclers working with the Company are audited during monitoring visits to ensure they are respecting their contract engagement with SAC.

Waste from the processing plant are reused in the field (Empty Fruit Bunch (EFB), ashes, etc.) or for the biomass boiler of the mill (fiber and shells).

Waste water is sent to effluent anaerobic and aerobic ponds called "lagoons" located outside the mill. In 2019, a total of 111 996 m³ of effluent was sent to the lagoons.

The Company works in close collaboration with the Waste Management Department of Bo District Council, with Welt Hunger Hilfe (WHH), with the Regional Office of the EPA-SL to find approved recycling outlets, and with the Pujehun District Council for the approval of landfill. SAC has built its landfill in 2013 composed with five containers (used to store plastics, metals, electrical and IT waste, small batteries and empty bags), two stores and workshops, four retentions areas (for the storage of hazardous products, waste oils and coolants) and a compost hole.

To communicate its waste management strategy, the HSE department is using the following methods:

- 1) Training to all staff having a function linked to hazardous waste management;
- 2) Sensitization of communities by the preparation of bye-Laws, meetings with chiefs, "Clean Village Competitions", support to waste management and collection, etc.;
- 3) HSE Minutes on waste management on Thursdays;
- 4) Inductions to new employees and visitors;
- 5) Evaluation of competences of the HSE department staff.

d. Protection and enhancement of biodiversity



Biodiversity in SAC

SAC's engagement to protect and enhance biodiversity is stated and communicated to its third parties through the Company's Environmental Policy. The concession comprises of 18 473 ha of land with 12 349 ha of oil palm trees and 6 124 ha of non-planted area which includes; 3 712 ha of swamp, 1 226 ha of greenbelts, 91 ha of tertiary protected forest, 66 ha of reforested areas, 1 029 ha of villages and roads.

The biodiversity management plan prepared by the Ministry of Agriculture, Forestry and Food Security (MAFFS) in 2015 serves as a guide for the Company in terms of biodiversity and ecosystem protection. Examples of SAC's strategy to enhance biodiversity are the reforestation project of 66 ha planted at the nursery, the collaboration with the MAFFS on report of illegal cuttings in protected forests, the two hectares allocated to the preservation of the threatened species "Ceiba Pattendra", the project of five bee hives in protected forests and the 5 000 fruits trees forestation with the establishment of nurseries in five primary schools to sensitize the young generation on the benefits of fruit tree planting.

However, in addition to this BESIA, since February 2019 SAC has started to implement the HCV assessment recommendations (conducted by Montrose) on the SAC concession by creating a forestry nursery with the recommended trees listed below.

	Species	Propagation	Economic Benefit	IUCN
1	Terminalia ivorensis	Seed	Good colonizer; thrive better in poor soil, high demand for timber	Vulnerable
2	Heritiera utilis	Seed	Important industrial timber	Vulnerable
3	Milicia regia	Seed	Excellent timber tree; good colonizer; medicine	Vulnerable
4	Lophira alata	Seed	Material for train sleeper; material (Pestle)	Vulnerable
5	Nauclea diderrichii	Seed	Popular timber species; materials (mortal & drum frame); medicine	Vulnerable

6	Gmelina arborea	Seed	Good colonizer; important timber tree; livestock forage	-
7	Tamarindus indica	Seed	Cash crop; use in cuisines; traditional medicine; thrive well in poor soil	-
8	Parkia bicolor	Seed	Food, economic activities, medical	-
9	Faidherbia albida	Seed	Agroforestry; nitrogen fixing tree; livestock fodder during critical period of drought	



24.10.2019 - EPA visiting SAC Nursery for Reforestation Projects in Hongai

e. Air emissions and ambient air

On an annual basis, SAC conducts air analysis at the mill's chimney by an external body recommended by the EPA-SL with experts in their field from Njala University. Results of this report have shown that emissions levels are within IFC standards. Annual monitoring will be conducted through the following year as the mill will be running on a more frequent basis.

To limit its emissions, the mill is equipped with a biomass boiler that is using by-products from the processing plant. All equipment and machinery are subjected to regular maintenance followed and recorded by the Workshop Manager in its monthly report. The generators and machines are maintained every 250 hours, trucks, tractors, cars are serviced every 5 000 km decreasing pollution risks.

Dust suppression programs are developed during the dry season by spraying water on the busiest roads and placing speed bumps in the plantation and in Sahn town. Speed controls and tracking systems are put in place to ensure limits are respected (below 60 km/h on roads and 40 km/h in villages) to reduce the level of dust emissions during the dry season.

The Company has a non-burning policy to avoid the burning of the windrows, waste and uncontrolled fires in the field. Several projects of reforestation have been done and are ongoing for carbon fixation.

f. Materials used

The consumption of all materials is followed on a monthly basis by the HSE department. This report gives the details of consumption for all materials used per month (fuel, paper, cement, sand, FFB, inks, water, etc.) with the targets of the Company. Offsets are highlighted and justified by the department concerned that is in charge of readjusting its consumption with an action plan.

Agrochemical usage (fertilizers, herbicides, fungicides and insecticides) are purchased on a need basis.

g. Energy

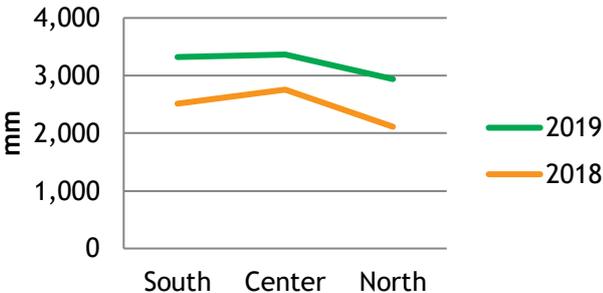
The electricity used by SAC is produced by 11 generators and 10 solar street lights that SAC supplies in the village of Sahn Malen. Power for the mill is provided by a steam boiler that runs on shell and fiber from the FFB. Workplaces are provided with daytime electricity. Compounds and some clinics are provided with day and night electricity.

The total energy consumption for 2019 is 154 611 kWh with 73 312 kWh for the housing and 64 960 kWh for the operational sites. In 2020 a 150 Kva solar power system will be installed in the main management compound so to reduce the use of fossil fuels.

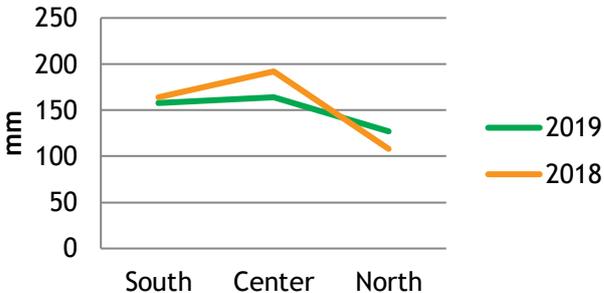
h. Impacts on climate change

The concession now has a growing plantation and a micro climate is evident on the plantation closer to the coastal area. The carbon stock value is improving and is sure to exceed that prior to SAC’s intervention, a study on this will be made to follow this aspect. SAC is implementing all environmental control protocols to reduce the impact on the environment and climate change.

SAC Precipitation (mm)



SAC Amount of Rain Days



i. Preservation of High Conservation Values and High Carbon Stock Forests

In order to obtain the necessary RPSO certification, the management team of the SAC plantation are committed to:

- Not developing areas that have High Conservation Value (HCV) or High Carbon Stock forests;
- Engaging with local communities so they are fully aware of the project and its operations;
- Complying with all relevant Sierra Leonean laws and regulations; and
- Conforming to applicable, international standards (principles and criteria for certification).

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

- Identify, maintain and protect High Carbon Stock (HCS) areas;
- Identify, maintain and protect High Conservation Values (HCV) areas;
- Identify, maintain and protect peatland areas;
- 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.

4. Environmental impact assessments

The environmental impact assessment starts with the identification of all Company's activities, their environmental impacts and aspects and the calculation of their frequency, level of severity, level of control and legal compliance. This calculation gives a total sum that will be considered as a "significant aspect" if above a level established by the Company. Once designated as significant, action plans and environmental performance with responsibilities are identified, addressed and discussed with HoD for validation.

Action plans are approved by the General Manager who releases the required resources to achieve the environmental objectives and targets. The environmental assessment is yearly revisited in management review with every responsible to control the progress and if needed to propose action plans on new significant aspects or to consider new development, activities, products or services.

5. High Conservation Value Studies and High Carbon Stock Approaches (HCV-HCSA)

As part of its endeavours to achieve Roundtable for Sustainable Palm Oil (RSPO) certification, SAC has engaged Montrose Environmental² to conduct an HCV assessment which started in 2018 and the field work was completed by February 2019.

In September 2019 various specialist studies were completed in compliance with the established High Conservation Value (HCV) approach for Roundtable on Sustainable Palm Oil (RSPO) certification. The conclusion of the studies presented delineations of the HCV areas and

² <https://montrose-env.com/>

recommendations to maintain and improve the ecosystem services provided by these delineated areas.

For the social assessment, methods, questionnaires and consultation guidelines have been considered such as talking points for village and focus group meetings, checklists and participatory mappings. Special focus for the consultation meetings with communities was on HCV 4 (regulating services), HCV 5 (provisioning ecosystem services that provide people's basic needs) and HCV 6 (cultural values), but reference was made to the broader scope of the overall HCV assessments, the scoping team that they had met before, and the specialist studies.

The findings of the assessment showed that HCV 4, HCV 5, and HCV 6 are triggered in the Area Of Interest (AOI); maps identify where the three HCV areas occur.

Specialist environmental studies for the HCV assessment also included physical environment (surface water), avifauna and mammals, herpetofauna, aquatic ecology and botany. Focus for these studies was on:

- HCV 1 (concentrations of biological diversity including endemic species and rare, threatened or endangered species that are significant at global, regional or national levels);
- HCV 2 (large landscape-level ecosystems, ecosystem mosaics and intact forest landscapes that are significant at global, regional or national levels); and
- HCV 3 (rare, threatened or endangered ecosystems, habitats, or refugia).

Some of the key findings for these areas are presented below:

HCV 1 areas were identified; 94 species of birds, 14 mammal species and 1 HCV mammal species, the Sooty Mongoose (*Cercocebus atys*), were identified within the SAC concession. The assessment of HCV 1 for herpetofauna resulted in no endemic, or Rare, Threatened and Endangered (RTE) species of amphibians or reptiles being recorded. For freshwater systems, HCV 1 has been triggered by a number of criteria RTE species (21 endangered taxa were recorded), highly range-limited endemic species and critical dispersal routes for fish.

HCV 2 areas are triggered in the AOI by some of the specialist studies. The site does not qualify as HCV 2 in terms of herpetofauna. In terms of large landscape level ecosystems and mosaics, HCV 2 has not been triggered by the botanical assessment. For freshwater systems, HCV 2 has been assessed as being present based on the following:

- Rivers with natural flow regimes;
- Rivers with no barriers up- or downstream (no impoundments were observed);
- Unmodified river channels - although several headwater tributaries are modified the Wanje, Maleni and other high order rivers are unmodified; and
- Unmodified thermal, sediment and nutrient regimes.

HCV 3 areas were identified. These habitats have been triggered for birds and mammals in a number of isolated areas and forest patches in the concession. With reference to herpetofauna, HCV 3 has been confirmed based on species identified during field surveys and using the precautionary principle (RTE ecosystems, habitats or refugia). HCV 3 habitats have been triggered in a number of isolated areas and forest patches.

6. Environmental non-compliances

The HSE department is audited four times a year by the EPA-SL and twice with the ISO 14001 certification (internal audit and certification audit). Non-conformities to the EPA-SL and ISO related audits are recorded in an action board and monitored by the HSE/Sustainability Manager.

In 2019, 68 minor non-conformities have been recorded of which 59 have been resolved. The increase of record of non-conformities is explained by the improvement of the environmental management system, by SAC objectives for continual improvement and by the involvement of all departments to record deviances to the procedures and implement mitigation measures to strengthen the management system.

Sources of non-conformities are linked to the EMS (documents, interpretation of results, dates on documents, certificates missing, etc.) and to the field (waste management, storage, temperature and noise, etc.). Non-conformities are opened after EPA audits, monthly HSE reports if targets are not respected and by the safety committee field observations. A number of non-conformities have been opened at the end of the year with the findings of the internal audit.

7. Programs and plans (existing and developed this year)

The Company follows the EPA-SL Act (2010) requirements which states that an Environmental Management Plan (EMP) comprising the Company's environmental impacts with appropriate mitigation measures must be sent to their agency on a quarterly basis.

In 2019, the environmental action plans of the Company were divided in the following five main objectives:

- 1) To continuously compile its efforts to decrease its needs of energy and natural resources;
- 2) To implement mitigation measures to reduce the risks of pollution from its activities;
- 3) Comply with applicable laws, regulations and other requirements;
- 4) Ensure and encourage fair and transparent communication and open dialogue with working staff and collaborators;
- 5) Promote a safe and healthy workplace.

These objectives have been completed with 77% attainment. The balance of actions that has not been completed was discussed in the management review and placed as significant aspects for 2020.

8. Achievements

The main achievement in terms of environmental management in 2019 is the successful renewal of the EIA license provided by the EPA-SL and the certification ISO 14001 with the improvement on reporting and action plans implementation.

9. Trainings

The planning and organization of training/retraining is approved on a yearly basis at the Management Review by all managers. Each department must provide/review its training list

according to the needs observed during the year, the type of operations and the level of competences.

The surveillance and management of this training calendar (support, attendance list, contents, evaluation of competences, etc.) is managed by the HSE department which prepares a yearly Training Calendar and reports on a monthly basis on the non-conformities observed against this planning. The details of training for the year 2019 are described above in chapter 7 “Training and Sensitization” page 34.

10. Monitoring

At the end of 2019, SAC counted 64 procedures to support its environmental management system. The communication, implementation and control of Standard Operation Procedure (SOP)’s are the responsibility of the HSE department which is externally audited by the EPA-SL and internally audited with the ISO 14001 certification as described above in chapter 6.

In 2019, the following results have been compiled in the monthly reports:

- 1) Planting: no additional planting of oil palm trees has been done in 2019. The concession remains 18 473 ha with 12 349 ha of oil palm trees, 3 712 ha of swamp, 1 226 ha of greenbelts, 91 ha of tertiary protected forest, 66 ha of reforested areas, 1 029 ha of villages and roads;
- 2) Quality Analysis: 2 air analysis, 280 noise measurements and 121 water analyses have been conducted in boreholes, water wells, oil separators, rivers and effluents ponds;
- 3) Communication: 199 internal meetings with 1 190 participants and 210 external meeting with a total of 29 958 participants have been organized;
- 4) Audits: some 4 audits from the EPA-SL, 2 from the MLSS, 1 from the Standard Bureau (calibration body), 3 on ISO 14001, 1 store audits from BDO (Binder Dijker Otte), 3 from the Ministry of Water Resources, 2 from the NASSIT, etc.;
- 5) CSR: a total amount of 181 944 USD has been spent for the support of Corporate Social Responsibility (CSR) projects and communities as well as general assistance to the District (Council, Police, Military, MAFFS, Ministry of Education, District Office, etc.) as per detailed page 62;
- 6) Forestation: 10 000 seeds have been invoiced to be placed in nursery for planting in communities in 2020;
- 7) Waste Management; a total of 32 237 kg (plastics, iron, cans, tins, etc.) and 68 429 m³ of waste have been collected by a registered dealer for a total benefit of 732 USD.

11. Number of environmental accidents (details)

In 2019, 68 minor environmental accidents have been recorded with 59 resolved at the end of the year.

12. Environmental accident rate for 200 000 hours of work

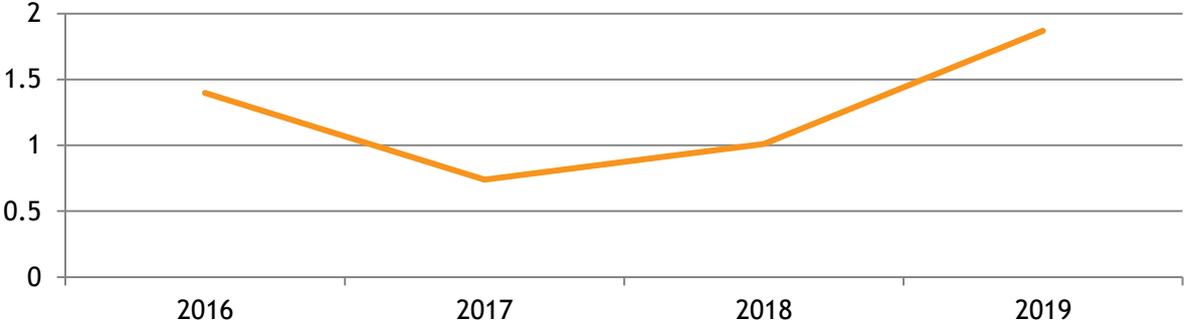
Considering the total of environmental accidents for 2019 and the total amount of work days, SAC environmental accidental rate per 200 000 hours work is 1.89.

13. Evolution over the time

The evolution over time of the environmental accident rate is stagnant as shown in the table below. A slight increase of the rate is observed due to the mill and the plantation being in full

production (milling increase, harvesting, transportation of fruits, loading operations...). However, this rate increase is also due to the improvement of SAC record of accidents and mitigation measures.

Environmental Accident Rate 2019



14. Relations with Government / administrations

In 2019, around 210 meetings (29 958 participants) have been organized with 95 meetings with communities, 45 with the Government, 4 with NGO’s, 26 with suppliers and 5 with the media. The increase of this amount from 2018 is due to SAC objective to improve its communication with its stakeholders and its recording methodology (attendance list, minutes of meetings, record of issues raised, action plans on observations...).

The HSE and community liaison departments meet regularly with several stakeholders such as the communities, the MWR, the MAFFS, the EPA-SL, the Sierra Leone House of Parliament, the Sierra Leone Road Safety Authority, the National Fire Force, the MLSS, etc.

On a monthly basis, meetings are organized with the MWR in Pujehun to share figures and projects on Water, Sanitation and Hygiene (WASH meetings). The Forestry officer of the MAFFS meets the HSE/Sustainability manager on the reforestation projects, the Forest Nursery and the HCV areas.

Every quarter the EPA-SL conducts an audit on the plantation to monitor the compliance with the environmental impact assessment license and the implementation of the environmental management plan.

Regular meetings are organized with the Sierra Leone Road Safety Authority in order to promote safety on the road and reduce the quantity of accidents. Ongoing collaboration continues with the Waste Management department of the Bo District Council who develops a recycling program in collaboration with Welt Hunger Hilfe (WHH).

15. Environmental aspects in the supply chain (training, audits, etc.)

SAC shared its commitments and exigencies to its supply chain by the communication of the environmental policy which is signed by all contractors and suppliers working with the Company. Negligence and non-compliance from third parties are reported to the General Manager and HSE/Sustainability Manager in charge of taking action against the party concerned. Records of misconduct are filed by the HSE/Sustainability Manager.

All suppliers and contractors have been informed on the environmental and social aspects through inductions and the signature of the Company policy. Spontaneous audits are conducted on suppliers, recyclers and contractors to ensure compliance of the Company's requirements.

The Company keeps a traceability of all documents linked to its suppliers and contractors including:

- An updated copy of the supplier' business registration or certificate;
- The Company's "Preferred Supplier Agreement";
- The HSE policy for suppliers;
- Warnings in case of non-respect of the contract requirements.

16. Objectives for the next year

SAC will conduct an ISO 14001:2015 audit in March 2020 in order to maintain certification. Additionally, the Company aims to continue its progress into the RSPO implementation process through putting in place HCV monitoring plans and develop best management practices.

VII. Contribution to local development

1. Local partners

a. Subcontractors

The Company respects the Local Content Policy of Sierra Leone by promoting partnerships with local partners in various areas such as:

- 1) Contracting local contractors to carry out plantation work employing up to 600 people;
- 2) The collection and recycling of the waste (plastic, metals, rubber materials, electrical and plumbing waste, IT equipment's, etc.);
- 3) All security personnel are contracted by Sharp Security Services which is a local partner company based in Freetown;
- 4) Fuel is provided by Sierraphil at the Sahn Malen Fuel Station in Sahn Malen which is a local company;
- 5) CPO is transported by a local company and local sales are to two main local traders who distribute in Sierra Leone;
- 6) Local initiatives are promoted in terms of suppliers such as the purchase of the Company's uniforms from a tailor in Sahn Malen amounting to over 30 000 USD to this one local supplier alone, thus providing empowerment and jobs;
- 7) Promotion of Sierra Leoneans into management positions.

b. Stakeholders engagement plan

A Stakeholder Engagement Plan (SEP) has been developed to maintain a two-way dialogue with stakeholders to ensure awareness and efficient management of their concerns. The SEP is a living plan, reviewed at least once a year in the Management Review where major grievances are addressed to and discussed with managers.

As part of its ISO 14001 requirements, the Company has identified all its interested parties with the definitions of their needs and the impacts generated by SAC on their activities. All interested parties (communities, chiefdom authorities, police, SAC employees, ministries, customers, shareholders, associations, unions, etc.) are evaluated by a level of requirements to which SAC must comply (certificate, licenses, agreement, bye-laws, monthly reports, etc.).

2. Community Development Action Plan

The Company's Community Development Action Plan (CDAP) defines the Company's strategy for the period 2016 to 2021. In December 2019 the CDAP was reviewed and submission to the EPA-SL will be made in early 2020. Effective community development helps to establish sustainable relationships and alliances between plantations, communities and governments. The CDAP aims to provide guidance on the implementation of short, medium and long-term investment in the communities surrounding the plantation. The CDAP is divided in two phases, which are the short-term investment, or "preliminary phase", and the long term or "ongoing phase".

Short-term community investment are the mitigation measures detailed in the Environmental and Social Health Impact Assessment (ESHIA) report made in 2011, with medium and long-term commitments developed in collaboration with local communities, following the Public

Disclosure of the ESHIA. This is a living document that should be referred to and updated on a regular basis by the Community Liaison Officers and the HSE department.

The first phase includes working with local stakeholders to design and implement livelihood and economic diversification programs, developing partnerships to implement health programs, with a focus on HIV/AIDS and malaria, and the development of community infrastructure. The long-term phase compiles the “ongoing” measures implemented by the Company which focuses on:

- Livelihood diversification: local livelihoods are rural based and dependent on farming, fishing and forestry. SAC is committed to assisting in the diversification of local livelihoods through the implementation of small-scale projects. In 2019, SAC spent 25 727 USD for the annual rice cultivation scheme which is for the development of other livelihood diversification schemes (Ploughing and harrowing of 605 acres of boliland, provision of 822 bushels to boliland farmers, provision of 822 bushels seed rice to boliland farmers, provision of 480 bushels of Inland Valley Swamps (IVS) seed rice to swamp farmers, etc.);



12.12.2018 - Rice Cultivation Project in Hongai

- Education: SAC is committed to increasing local educational standards through the delivery of local training programs catering for a range of skills (i.e. hygiene promotion, waste management, fire exercises, Malaria and HIV World Day, etc.);
- Sanitation: SAC is committed to installing water wells and latrines in communities with training of a local representative in the repair of water wells to ensure autonomy and continuous management. Analysis on the water quality is conducted on an annual basis by the Company on all water wells used in the village in order to ensure portability of the water consumed;
- Health: improvements to health care is a key focus area for SAC’s CDAP. Specific measures include an emergency line and ambulance for transporting local community members to hospital, working closely with the MoHS on awareness programs in relation to HIV/AIDs and malaria;

- Road infrastructure: the Company is maintaining the roads inside the Malen Chiefdom including the roads leading to the concession from Pujehun to Sahn Malen and from Koribundu to Sahn Malen;
- Communication: the Company built a community radio station in 2018 which provides communities with local news, programs and interests of the Chiefdom. The radio station is loved by everyone.



14.10.2018 - Radio Station in Sahn Malen

Several of the community development initiatives outlined above will continue until 2021, including the provision of emergency response vehicle and telephone line. Special care will be taken to ensure that vulnerable groups, including women, are part of this engagement process and that all voices are heard. As already stated, investment packages for the other communities will be planned to ensure that the community development program is as far reaching as possible.

3. Neighbourly relations with local communities

SAC built a strong social commitment in the Malen Chiefdom by encouraging and maintaining an open and cordial working relationship within its concession due to the creation of the Social and Grievance Committee and organizing an end of the Year Party for all its 3 287 employees.

In 2011, a Social and Grievance Committee was founded. It is chaired by the Paramount Chief (in his absence the Chiefdom Speaker) and composed by the stakeholders of the Malen Chiefdom (Town and Section Chiefs, District Representatives, Women and Youth Leaders, etc.). This committee meets every month with the General Manager, the Human Resources Manager and the CLD to discuss pertinent issues, enhance communication, approach and resolve grievances, etc. This committee selected a sub-committee who is in charge of the proposition, prioritization and planning of the CDAP and Corporate Social Responsibility (CSR) Projects to be discussed and implemented by the Company. During such meetings, reviews will be made of the progress of on-going and committed projects in their respective areas to ensure that they are being done in the way and manner planned, and to discuss any occurrences that may necessitate changes in plans.

Additionally, SAC employs full time Community Liaison Officers (Mende speaking) responsible for managing communication and relations with stakeholders. These officers have experience of communication and liaising with communities and are reporting directly to the General Manager on consultation, grievances, results and progress, either successful or unsuccessful, and with ideas or impacts relating to the project. This department is known around the workforce via HSE Minutes and Induction and around the communities by regular visits to villages and communities. At the end of 2018, SAC engaged two additional officers who are in charge of the management of the HCV and the communication of the implementation of RSPO inside the communities. Land disputes that may arise are handled by the Liaison Officers first and where necessary, the social and grievance committee will intervene. This forum is also used to address issues of this nature and decide on Corporate Social Responsibility programs.

Two members of the liaison team sit on the social and grievance committee. All social and grievance committee meetings have minutes and attendances signed. Issues linked to neighbouring populations are recorded in the external grievance logging file.



12.12.2018 - Stakeholder Meeting at Sahun

a. Access to health and education for communities

Inside the concession, there are 52 communities' villages with 22 public schools and 7 Public Health Units (PHU). Sahn Malen being the capital of Malen Chiefdom is the biggest in the plantation with a police station, bars and restaurants, a Community Health Center (CHC), SAC offices and the House of the Paramount Chief.

Section	Quantity of Villages	Village Names
Bahoin	7	Semabu, Sinjo, Massao, Walleh, Kortumahun, Taneinehun, Sembehun 2
Kakpanda	7	Libbie, Taninahun, Bendu Junction, Bendu, Borbuwa, Borbuwlo, Blamawulo
Kemoh	3	Nianyahun, Saahun, Jumbu
Korwa	7	Ngiema, Basalleh, Sahn, Ngiyehun, Borbu, Bombohun, Macca
Lower Pemba	5	Gboyama, Sembehun 1, Gandorhun, Bomuvulahun, Malay
Seijeila	5	Bamba, Hongai, Gangama, Hinai, Gambia
Taukunor	14	Senehun, Jolahun, Njaluahun, Kpangba, Kpangba Junction, Fakaba, Banaleh, Kanga, Jombohun, Gbongboma, Potain, Kassay, Kpombu, Mornogor
Upper Pemba	4	Manowulo, Kpanguma, Sengema, Tissana



Handover to the Ministry of Health of the health center quarters at Sengema clinic built by SAC

b. Energy and water supply

In 2019, the Company repaired 55 wells from January to December and three new toilets have been built. The total budget spent by SAC in water supplies in 2019 is 14 936 USD.

c. Opening and maintenance of roads

In 2019, SAC spent 106 727 USD in the maintenance of roads. This cost includes the repair and running costs of the use of the machines (excavators, graders, dozers, dumpers, compactor, etc.). Around 42 km of public roads have been rehabilitated from Koribundu to Sahn Malen. Several roads have been repaired with the replacement of culverts and the repair/construction of bridges to access villages as requested in the Social and Grievance Committee Meetings.

d. Donations

Socfin provided a donation of rice during Ramadan for a value of 3 300 USD. Various supports have been provided to the Malen communities and District for a total amount of 220 000 USD in 2019.

4. Partners in local development projects

a. With communities

The Company benefits some strategic partnerships with communities, government, NGOs and other stakeholders which involve joint activities and collaborative efforts based on a common interest. The list of partnerships and stakeholders with the assessment of the viability and effectiveness of potential partnership is among the Stakeholders Engagement Plan (SEP) such as the following:

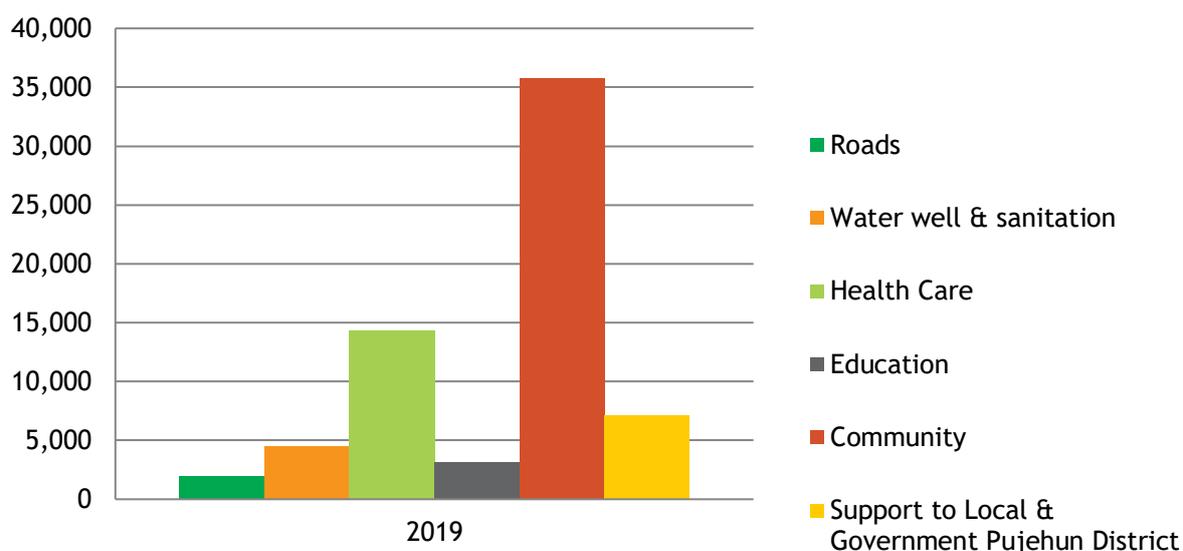
- Partnership with the Ministry of Health and Sanitation through the organization of environmental sensitization in primary and secondary schools in Malen Chiefdom;
- The Company is sharing common objectives with the MAFFS by the development of rice cultivation, beehives, protected forest and reforestation projects;
- Partnership with the Pujehun District Council via financial support or in-kind resources to ensure and secure an ongoing health care for the Malen Chiefdom;
- Partnership with the MWR through the implementation of water quality sensitization in villages, the organization of water well chlorination and the sharing of information regarding the water quality monitoring, the water wells and boreholes GPS data;
- Partnership with Njala University via several internships to assist students in practical learning;
- Partnership with HIV associations (Eyes SL) and the National HIV/AIDS Secretariat for the commemoration of the World Aids Day;
- Partnership with World Vision inside the communities' relationships (Ebola prevention, wells maintenance, etc.);
- Partnership with Peace Core by the creation of Nature Clubs in schools and other projects linked to the education and pupils' sensitizations.



01.12.2018 - HIV Commemoration: Partnership SAC - Eyes - MoHS

The Company spent 181 944 USD in 2019 for the financial support to communities.

CSR Programs December 2019



1- Roads			
Repair & back filling of Koribondo & roads to various communities	January	Pujehun District	49 360
Placement of culverts	All year	Pujehun District	1 950
Repair & back filling of Koribondo & roads to various communities	December	Pujehun District	54 600
Slash & clean road from Sahn to Pujehun town	December	Pujehun District	817
2- Water well & sanitation			
Water well repairs in Malen	January - March	Various villages as per work orders	2 187
Water well repairs in Malen	April - August	Various villages as per work orders	2 351
Water well repairs in Malen	July - September	Various villages as per work orders	2 146
Water well repairs in Malen	September - December	Various villages as per work orders	1 696
3- Health Care			
Support to Sengema Health Clinic	22/02/2019	Sengema Town	159
Provision of 24h electricity of Sahn clinic 1 st quarter	January - March	Malen Communities	840
Provision of 24h electricity of Sahn clinic 2 nd quarter	April - June	Malen Communities	844
Provision of 24h electricity of Sahn clinic 3 rd quarter	July - September	Malen Communities	937
Provision of 24h electricity of Sahn clinic 3 rd quarter	September - December	Malen Communities	1 012
Provision & running costs of ambulance for Malen Chiefdom	January - March	Malen Communities	3 787
Provision & running costs of ambulance for Malen Chiefdom	April - June	Malen Communities	4 052
Provision & running costs of ambulance for Malen Chiefdom	July - September	Malen Communities	3 747
Provision & running costs of ambulance for Malen Chiefdom	September - December	Malen Communities	3 951
4- Education			
Support to NPSE Examination	May	Malen Chiefdom	556
Support to Schools for June 16 commemoration	June	Malen Chiefdom	1 120
Award of Scholarships to Students	September	Malen Chiefdom	1 746

Handing over of Kortumahun Primary School	September	Malen Chiefdom	786
Support to BECE students	July	Malen Chiefdom	1 480
5- Community			
Support to Malen Chiefdom Football Association	16/03/2019	Malen Chiefdom	253
Provision of 351 bushels of Groundnuts to 16 groups of women in Malen	23/03/2019	Malen Chiefdom	5 993
Support to Malen Chiefdom Football Association	16/03/2019	Malen Chiefdom	253
Breaking of old mill floor in Sahn with dozer for a new primary school	January 2019	Sahn Town & District	1 120
Provision of seven hundred and thirty five bushels of seed rice	April 2019	Malen Chiefdom	10 756
Support to community to carry out their customary activities	April 2019	Niahun Town, Malen Chiefdom	244
Donation to A fire victim	April 2019	Sahn Town, Malen Chiefdom	154
Support to community to carry out their customary activities	April 2019	Kortumahun	244
Support to Malen Chiefdom Football Association	April 2019	Malen Chiefdom	3 876
Assistance to RC School for athletics	April 2019	Malen Chiefdom	608
Assistance to NIM School for athletics	April 2019	Malen Chiefdom	475
Transport refund to Radio Malen to cover sports	April 2019	Malen Chiefdom	43
Support to annual sports at MJSS	May 2019	Malen Chiefdom	882
Support to United Brothers Football Association	June 2019	Malen Chiefdom	43
Support to Fish Ponds rehabilitation	June 2019	Malen Chiefdom	689
Provision of 520 bushels of IVS seed rice	June 2019	Malen Chiefdom	8 878
Support to Malen Female Stars Football Association	August 2019	Malen Chiefdom	776
Donation to Flood victims at Sinjo	August 2019	Malen Chiefdom	488
Repair of Sahn Market	01/08/2020	Malen Chiefdom	13
Refreshment for Female Malen Stars	September	Malen Chiefdom	109
Support to Gender Football Club	September	Malen Chiefdom	1 059
Support to Volley ball Community	November	Malen Chiefdom	396
Donation to OKADA Group	November	Malen Chiefdom	488
Support to All Stars Football Group	November	Malen Chiefdom	62
6- Support to Local & Government Pujehun District			
Donation to Pujehun District Council for distribution of school materials	January	Pujehun District	150
Support to Pujehun District Civil Society Group	February	Pujehun District	5 899
Support to Pujehun Football Association	March	Pujehun District	256
Support to the Ministry of Agriculture	October	Pujehun District	244
Support to Pujehun District Council for the visit of the First Lady	October	Pujehun District	1 220
Donation of rice during Ramadan	April	Pujehun District	3 300

VIII. Internal and external communication

1. Strengthening internal communication

In 2019, SAC improved its internal communication by increasing its communication of procedures and policies to its staff and conducting random controls on the level of knowledge of its staff on these requirements.

2. Strengthening external communication

In 2019, SAC has drastically increased its communication with the newly established community radio station with both internal and external audiences. Socfin talks have been allocated to address safety issues, workers questions, public holidays announcements, SAC memos, recruitments... The radio station is a community project requested by communities to develop communication inside the Malen Chiefdom on various topics. SAC assisted the community with the construction and will engage the radio for the sharing of communication: public holiday announcement, advertisings, Worlds Days sensitization (Malaria, HIV, Safe Workplace...), etc.

3. External communication results

In some Facebook publications over 70 000 people are reached on published stories which mainly pertain to CSR work carried out.

Over the Malen Community radio SAC provides updates of information about the Company, which provides listeners with details about Company policy and any changes that may happen.

4. Participation in events and/or sponsorship

The General Manager as Chairman of the Commercial Agricultural Producers & Processors Association had seven association meetings held at different member's plantations or premises and one meeting with the President of Sierra Leone. The General Manager engaged himself with various business partners, buyers and suppliers and members of Government to develop and maintain a conducive business environment for the Company to operate in.

IX. Objectives and perspectives 2019-2020-2021

SAC has a strategic plan to develop the plantation into a sustainable and profitable project. Additionally, commercial, social and environmental plans are as follows:

- From 2019 onwards, greater awareness of all plantation activities and information will be possible with the building and commissioning of a community radio station;
- Centralizing the power generation and distribution to the main consumers on the plantation (workshops, houses, offices, and construction) will be done using a 33 Kva line. This project will be realized in 2021/22. This will allow power to be supplied by the turbine generator and reduce fossil fuel consumption bringing an enormous saving to the Company;
- Complying with the RSPO Principles and Criteria's 2018 and the Supply Chain Certification Standard in order to be prepared for the RSPO certification audit planned in 2020.
- The extension of the mill to 60 T/h will started in 2019 and be completed by 2021.
- Ideas to develop:
 - RSPO
 - Implementation of results of HCV
 - Continue work done with communities
 - CDAP

X. Glossary

AIDS	Acquired Immune Deficiency Syndrome
AOI	Area of Interest
APOI	Africa Palm Oil Initiative
BDL	Below Detection Limit
BDO	Binder Dijker Otte
BECE	Basic Education Certificate Examination
BESIA	Biodiversity and Ecosystem Services Impact Assessment
BMP	Biodiversity Management Plan
CAPPA	Commercial Agricultural Producers & Processors Association
CBA	Collective Bargaining Agreement
CDAP	Community Development Action Plan
CHC	Community Health Center
CLO	Community Liaison Officer
CPO	Crude Palm Oil
CSR	Corporate Social Responsibility
DMO	District Medical Officer
ECOWAS	Economic Community of West African States
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMS	Environmental Management System
EPA-SL	Environment Protection Agency of Sierra Leone
ERM	Environmental Resources Management
ESA	Environmental Significant Aspects
ESHIA	Environmental, Social and Health Impact Assessment
FFB	Fresh Fruit Bunches
FPIC	Free Prior and Informed Consent
GIS	Geographic Information System
GM	General Manager
GST	Good and Services Tax
Ha	Hectares
HCS	High Carbon Stock
HCV	High Conservation Value
HCVA	High Conservation Value Area
HIV	Human Immunodeficiency Virus
HOD	Head of Department
HR	Human Resources
HSE	Health Safety & Environment
IFC	International Finance Cooperation
ISO	International Standard Organization
IUCN	International Union for Conservation of Nature
IUD	Intra Uterine Device
IVS	Inland Valley Swamps
MA	Medical Administrator
MAFFS	Ministry of Agriculture, Forestry and Food Security
MJSS	Malen Junior Secondary School
MLSS	Ministry of Labour and Social Security
MoHS	Ministry of Health and Sanitation

MoU	Memorandum of Understanding
MWR	Ministry of Water Resources
NASSIT	National Social Security and Insurance Trust
NGO	Non-Governmental Organization
NPSE	National Primary School Exams
NUFPAW	National Union Forestry Plantation for Agricultural Worker
OER	Oil Extraction Rate
OH&S	Occupational Health and Safety
OHSAS	Occupational Health and Safety Assessment Series
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RC	Roman Catholic
R&D	Research & Development
RSPO	Roundtable on Sustainable Palm Oil
RTE	Rare, Threatened and Endangered
SAC	Socfin Agricultural Company
SEP	Stakeholder Engagement Plan
SOP	Standard Operating Procedure
TFA	The Tropical Forest Alliance
TFT/EF	The Forest Trust/Earthworm Foundation
URPMICE	Union of Railway Plantation Mineral/Mining Industrial Construction of Employee
WASH	Water, Sanitation and Hygiene
WASP	Weightbridge Application for Standardised Plantation
WHH	Welt Hunger Hilfe
WHT	Withholding Tax
WMP	Waste Management Plan

XI. Key figures

	Units	Targets	SAC
Financial data (expenditures)			
General infrastructure	EUR		1 657 587
Health	EUR		108 233
Education	EUR		49 512
Environment	EUR		676 256
Occupational health and safety	EUR		64 808
Trainings	EUR		6 261
Framework	EUR		0
Donations	EUR		46.021
Other specific projects	EUR		0
Total investments	EUR		2 608 679
Loans	EUR		160 188
Workforce			
Permanent employees	nb		1 434
of which are female	nb		246
Daily workers	nb		1 102
Temporary employees	nb		0
Contractors	nb		751
Other: trainees, etc.	nb		0
Total workforce	nb		3 287
Staff turnover rate	%		1.24%
Employees eligible for maternity leave	nb		31
Employees on maternity leave	nb		31
Employees supposed to return to work	nb		31
Employees who have returned to work	nb		31
Maternity leave return to work rate	%		100%
Employees eligible for paternity leave	nb		0
Employees on paternity leave	nb		0
Employees supposed to return to work	nb		0
Employees who have returned to work	nb		0
Paternity leave return to work rate	%		N/R
Concessions and planted area			
Concession size	hectares		18 473
Oil palm planted area	hectares		12 349
General infrastructure			
Palm oil mills	nb		1
Production			
Crude palm oil	T		24 297
Of which RSPO certified palm oil	T		N/R
Health and Safety			
Working accidents - Only for permanent and temporary workers			
Total hours worked	nb		2 325 036
Work-related fatalities	nb		0
Work-related injuries	nb		374
Injury rate per 200 000 hours	nb/200 000 h		32.17

Occupational injuries or illness resulting in DART	nb		325
DART incidence rate per 200 000 hours	nb/200 000 h		27.96
Lost days	nb		1 169
Lost day rate per 200 000 hours	nb/200 000 h		100.56
Training			
Training and sensitization	nb		2 233
Training hours	h		745
Workers that attended training	nb		42 777
Are the reported training sessions only for daily and temporary workers?	Yes/No		No
Consumption indicators			
Factories			
Fuel use per processed ton of FFB	L/T FFB		0.26
Water use per processed ton of FFB	m ³ /T FFB		1.51
Electricity use per processed ton of FFB	kWh/T FFB		18.66
Workshops and garage			
Average fuel consumption - light vehicles	l/100 km	< 14.5	12.04
Average fuel consumption - trucks	l/100 km	< 55	68,79
Average fuel consumption - tractors	l/h	< 4.0	3.90
Average fuel consumption - gensets	l/kWh	<1.8	0.29
Renewable energy production			
Steam turbines fed by biomass	kWh		1 598 721
Turbine power produced/ton FFB processed	kWh/T FFB		14.72
Turbine use POM	%		78.85
Quality indicators			
Air emissions and ambient air			
SO ₂	mg/m ³	<500	BDL
NO _x	mg/m ³	<200	BDL
Dust	mg/m ³	<50	18.5
CO	mg/m ³	<9	BDL
Waste management: household and common industrial waste generation			
Waste sold	kg		32 237
	m ³		68 429
Waste collected by a registered dealer	kg		32 237
	P/C		68 429
Waste disposed of in the company landfill	kg		N/R
	m ³		17 502
Liquid waste disposed of in the lagoons	m ³		111 996
Waste recovered (organic recycling/composting)	m ³		16 632
Agricultural data			
Toxic products used			
Use of Carbofuran	kg		0
Use of Paraquat	l		0
Others OMS 1a / 1b	kg		0
Organic fertilizer used			
Empty fruit bunches	T		5
PK fibers	T		0
Other solids	T		0

Medical data			
Ambulance	nb		1
Consultations	nb		6 751
Hospitalizations	nb		50
Family planning	Yes/No		Yes
HIV treatment	Yes/No		Yes
Tuberculosis treatment	Yes/No		Yes
Diagnosed malaria	nb		213
Educational data			
Crèches	nb		0
Nursery schools	nb		2
Primary schools	nb		23
Secondary schools	nb		2
Total	nb		27
Of which are plantation schools	nb		0
Teachers	nb		140
Of which are supported by the plantations	nb		15
	%		11%
Students	nb		5 558
Ratio students/ teacher	nb		39.84
Villages data (only for estate villages)			
Estate villages	nb		8
Population - Housed employees	nb		177
Population - Dependents	nb		222
Population - Illegal occupants	nb		0
Population - Number of other occupants	nb		0
Total - Population	nb		399
Housing	nb		66
New housing	nb		6
Renovated housing	nb		35
Kitchens	nb		49
New kitchens	nb		5
Renovated kitchens	nb		16
Latrines / showers	nb		53
New latrines / showers	nb		2
Renovated latrines / showers	nb		34
Sport fields	nb		2
Shops	nb		0
Clubs	nb		1
Market places	nb		0
Gathering places	nb		1
Water points	nb		8