

SAC Action Plan

UPDATE JANUARY 2025



SAC – ACTION PLAN – JANUARY 2025

ALLEGATIONS	ACTIONS	TIMEFRAME	NEW TIMEFRAME	REASON FOR DELAY	CURRENT STATUS
Irregularities in the approval process of the leases and sub-leases agreement	Conduct a thorough review of sub-leases and take necessary steps to address the irregularities identified in consultation with the government.	Dec. 2024	Dec. 2025	National administration delay	Started
Consultation, transparency and inclusiveness of landowners in the land acquisition process	Implement the Action Plan ("Malen Chiefdom Action Plan to Identify Landowner Acreages and Determine the Annual Lease Rent for Each Land Owner") in collaboration with the company GeoData SL (Ltd), approved by the Land Commission SL.	Dec. 2024	April 2025	- Land commissioner (Mr. Sowa) passed away in December 2024 - Unresolved land conflict between 2 communities	Started
	Address any claim (related to landowners' identification) that may arise during the implementation of the Action Plan.	Dec. 2024	/	/	Closed
	Study the possibility of sharing land lease agreements with the Land Commission as part of the process of distributing land titles to landowners.	March 2025	Dec. 2025	National administration delay	Started
Crop compensation	Address any claim (related to crops compensation) that may arise during the Action Plan.	Dec. 2024	/	/	Closed

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Inequities in land lease payments	Identify landowners and their acreages during the Action Plan.	Dec. 2024	/	/	Closed
	Examine with the Law Office the possibility of the company paying land leases directly into landowners' bank accounts.	March 2025	/	/	Started
	A clear documentation process must be set up to monitor the payment of land lease.	March 2025	/	/	To start
Documentation compensation process	Each step of community engagement for the action plan should be clearly documented, and available at all section chief level with their acknowledgement of receipt.	Feb. 2025	April 2025	- Land commissioner (Mr. Sowa) passed away in December 2024 - Unresolved land conflict between 2 communities	Started
Degradation of natural areas and lack access to land for farming	Evaluate the dynamics of the evolution of greenbelts since project implementation.	Feb. 2025	April 2025	Availability of the Group's mapping officer and Drone deploy license renewal	Started
	Update the customary maps with the communities.	June 2025	/	/	To start
	Continue to regularly engage with stakeholders regarding the implementation of alternative projects.	Continuously	/	/	Continuous

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Smallholders oil palm out-grower scheme	Engage with stakeholders to discuss alternatives to oil palm out-grower.	March 2025	/	/	Started
Access to drinking water	Carry out a review of the water wells built by SAC in order to implement appropriate corrective measures where possible.	July 2024	/	/	Closed
	Define company standards for the quality of the hand pumps with the communities and put in place a clear monitoring system for those infrastructures.	July 2024	/	/	Closed
Water and waste management	Define a distance limit to be respected with communities/quarters and blocks receiving EFBs.	June 2024	/	/	Closed
	Regularly maintain culverts to prevent flooding.	Continuously	/	/	Continuous
	Ensure appropriate treatment and traceability for different types of waste.	March 2025	/	/	Started
	Conduct further analysis to determine the origin of phosphate compounds in surface water in order to take appropriate action.	July 2024	/	/	Closed

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Sexual Harassment and Gender-based violence	Provide enhanced training for Gender Committee.	May 2024	/	/	Closed
	Promote inclusivity within the Gender Committee by including a representative for each department.	May 2024	/	/	Closed
	Strengthen training programs on sexual harassment and gender-based violence that covers all levels of workers.	Dec. 2024	/	/	Closed
	Establish budget to strengthen the Gender Committee.	Nov. 2024	/	/	Closed
	Strengthen the Gender Committee: by hiring additional in-house qualified staff or studying the possibility of collaborating with an external body.	Dec. 2024	March 2025	Assessment to be carried out by top management to study the need to appoint a full time	Started
	Ensure that all cases of Sexual Harassment (SH) and Gender-Based Violence (GBV) are reported to the Gender Committee.	Dec. 2024	/	/	Closed
	Establish a hotline (as part of an effective grievance system) for reporting sexual harassment at the workplace.	Oct. 2024	Feb. 2025	Technical issues with the national operator of the hotline	Started
	Ensure pictorial communication warning signs within the plantation that indicate clear disciplinary process and zero tolerance of sexual harassment.	June 2024	/	/	Closed

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Air pollution	Ensure communities along the main road have speed bumps.	May 2025	/	/	Started
	Train drivers from the company on road safety.	Dec. 2024	/	/	Closed
	Continue to regularly sensitize road users on road safety.	Continuously	/	/	Continuous
	Continue recording and investigating all road accidents.	Continuously	/	/	Continuous
	Continue to record road consumption of water.	Continuously	/	/	Continuous

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Employment Conditions, Work safety and Labor Rights Violations	Provide a medical check to all workers irrespective of their contracts and nature of work.	Feb. 2025	/	/	Started
	Design a monitoring template to monitor workers especially in the mill, ensure working hours conform with the Employment Act 2023.	June 2024	/	/	Closed
	Review the transport allowance for workers.	March 2024	/	/	Closed
	Review and implement recruitment and hiring procedures types of workers (seasonal, contractors, etc.).	Sept. 2024	March 2025	Restructuration of HR Dept and training for the HR team (external trainers)	Started
	Review and update the workforce spreadsheet and include workers ages and date contract signed.	June 2024	/	/	Closed
	Study the possibility of collecting worker's community origin information for new recruit.	May 2025	/	/	Started
	Ensure communities with a barray built by SAC have a notice board to post information about work opportunities and their rights at work + how to report abuse/corruption.	Oct. 2024	/	/	Closed

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Criminalization and Intimidation of NGOs by local authorities: Judicial harassment	Communicate SAC's policy on human right to the local authorities and communities.	Nov. 2024	/	/	Closed
Infringements by local authorities of freedom of movement and association	Publicly promote Policy on the Freedom of association with the Chiefdom authorities, and publicly affirm that all stakeholders are welcome in SAC's concession.	Nov. 2024	/	/	Closed
	Review the company's security strategy with Chiefdom Committee, CSOs (relevant stakeholders).	Jan. 2025	Sept. 2025	Global re-organization to be done in collaboration with the Grievance Committee	Started
Buffer zones	Continue to implement the remediation and compensation plan.	Continuously	/	/	Continuous
	Sensitize communities on the purpose of the riparian areas.	July 2024	/	/	Closed

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Analysis of the impact of the loss of agricultural land on the communities' right to food	Engage the Ministry of Lands/Agriculture to assess the food security in Malen Chiefdom.	Jan. 2025	March 2025	Slow responses from Ministry of agriculture	Started
	Continue to engage with community members on alternative livelihoods projects.	Continuously	/	/	Continuous
	Finalize participatory customary mapping with communities.	June 2025	/	/	To start
	Update the identification criteria of vulnerable people and update the list per community.	March 2025	/	/	Started

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