



Sustainability Action Plan 2017-2018

YEAR 2: July 2017 – December 2018

This action plan contains 21 activities that disaggregate in 97 tasks that are implemented in order to achieve the outcomes listed below:

- 1) The company is transparent with workers and stakeholders about its institutional policies, corporate values, plans, operations and grievances.**
- 2) Human rights are respected and promoted.**
- 3) Natural resources for the production of palm oil are managed responsibly by the company, based on best practices for the mitigation of possible impacts to the environment (water, soil and atmosphere).**
- 4) The company contributes to local development.**

REPSA reports progress on the implementation of this plan on a quarterly basis. All reports can be read and downloaded in Spanish and English on our site (www.repsa.com.gt).

EXPECTED OUTCOME	ACTIVITY	TASK	Timeline (quarters)				
			Q1 jul – oct 2017	Q2 nov 2017 – feb 2018	Q3 mar – jun 2018	Q4 jul – oct 2018	nov – dic 2018
<u>1. TRANSPARENCY AND STAKEHOLDER ENGAGEMENT</u> <i>The company is transparent with workers and stakeholders about its institutional policies, corporate values, plans, operations and grievances.</i>	1.1 Standardize -internal and external- processes to socialize corporate policies and values.	1.1.1 Structure an Internal Training Unit within the Human Resources Department responsible for the communication with and training of workers.					
		1.1.2 Design a training methodology appropriate for the target audience.					
		1.1.3 Develop training material on key policy and corporate values, according to the methodology designed.					
	1.2 Make information on the implementation of the Sustainability Action Plan available (transparent), including the process of sharing its progress with stakeholders.	1.2.1 Submit the draft of the new Sustainability Action Plan and invite stakeholders to provide comments and contributions.					
		1.2.2 Submit the draft of the new Sustainability Action Plan and invite NGOs to provide comments and contributions.					
		1.2.3 Analyze and incorporate stakeholders' input to the new Sustainability Action Plan.					
		1.2.4 Publish final version of Sustainability Action Plan in the website.					
		1.2.5 Publish periodic reports on Action Plan progress: quarterly progress reports					
		1.2.6 Publish final report on Plan of Action implementation.					

		1.2.7 Socialize new policies generated by the company and updates/modifications to existing policies with local stakeholders.					
		1.2.8 Publish report on implementation of responsible production of palm oil policy (share with clients, stakeholders and through REPSA website).					
	1.3 Systematize the grievance mechanism to better address complaints and queries.	1.3.1 Evaluate the effectiveness of the grievance mechanism to identify opportunities for improvement.					
		1.3.2 Re-design the grievance mechanism procedure for attending labor, community and public complaints.					
		1.3.3 Socialize the new grievance mechanism procedure with stakeholders and invite them to give their observations and suggestions.					
		1.3.4 Create an action plan to implement the new grievance mechanism procedure.					
		1.3.5 Implement new procedure of grievance mechanism.					
		1.3.6 Create an integrated sustainability section (dashboard) on the company's website.					
		1.3.7 On a regular basis, feed the sustainability section to strengthen it with information of interest to stakeholders.					

		1.3.8 Publish a report on complaints of public interest, directly addressing the statements of the Open Letter to NGOs of April 17, 2017.					
		1.3.9 Periodically update the grievance list according to the status of each case.					
		1.3.10 Re-structure the strategy to address not-yet-resolved past grievances.					
		1.3.11 Implement the action plan to address past grievances.					
	1.4 Strengthen communication and engagement with stakeholders.	1.4.1 Review and update stakeholders mapping.					
		1.4.2 Assess current status of the company's stakeholder engagement.					
		1.4.3 Create an action plan to implement stakeholder engagement strategy.					
		1.4.4 Identify opportunities for dialogue to promote stakeholders participation in a multisectorial process focused on addressing development issues (based on the recommendations of the CBI and TFT study).					
		1.4.5 In consultation with local and national stakeholders, develop a roadmap for a multisectorial dialogue.					
		1.4.6 Re-design 2016 social impact assessments (SIA).					
		1.4.7 Conducting social impact assessments based on new methodology.					

		1.4.8 Re-define social investment based on the results of the new Social Impact Assessments.					
	1.5 Execute commitments acquired through cooperation agreements and strategic alliances.	1.5.1 Carry out actions established in the Governance Pact of Sayaxché, and commitments adopted by the company through cooperation agreements with the Municipality of Sayaxché, the Association of Friends of Development and Peace, and the Social Progress Institute.					
	1.6 Implement a compliance system.	1.6.1 Perform an assessment to identify gaps.					
		1.6.2 Design Action Plan to close gaps.					
		1.6.3 Implement Action Plan to close gaps.					
<u>2. HUMAN RIGHTS AND WORKING CONDITIONS</u> <i>Human rights are respected and promoted.</i>	2.1 Create and implement a Human Rights Policy, with a Security chapter aligned with the Voluntary Principles of Security and Human Rights (VPSHR).	2.1.1 Prepare a draft of the Policy through external consultancy (ABHR).					
		2.1.2 Internally and externally socialize the policy draft to receive input and validation.					
		2.1.3 Monitor the implementation of the Human Rights Policy.					
	2.2 Within the framework of human rights, develop security standards and procedures aligned with internationally accepted standards and principles.	2.1.2 Develop a training workshop to strengthen skills of managers and heads of areas and enhance protocols on risk evaluation.					
		2.2.2 Develop a training workshop to review and validate the risk assessment matrix developed in the previous workshop (2.1.2), and address the expectations listed in the VPSHR with managers and heads of areas.					

		2.2.3 Develop a Security Management Plan based on the risks identified and aligned to the VPSHR.					
		2.2.4 Based on the Security Management Plan and the Human Rights Policy, review and adapt the contents and methodology of the security guards training.					
		2.2.5 Implement training for guards based on the Security Management Plan (readjusted contents and methodology, task 2.2.4) and the Human Rights Policy.					
		2.2.6 Share with Public Security the relevant expectations of the VPSHR and the Human Rights Policy (Security Chapter).					
	2.3 Verify progress on respect and protection of human rights through regular monitoring.	2.3.1 Perform an external assessment to identify gaps on respect and protection of human rights, and risks and impacts of the company's approach to human rights.					
		2.3.2 Socialize the results and recommendations of the human rights external assessment with managers and heads of area of REPSA.					
		2.3.3 Carry out capacity building workshops on HR issues for managers and heads of area, based on the recommendations of the external assessment.					
		2.3.4 Validate the Policy to Prevent Violence and Intimidation with an external entity with expertise in the field of human rights.					

		2.3.5 Review the methodology and materials designed by the consultant for the training workshop for staff in charge of implementing the policy.					
		2.3.6 Carry out training workshops (3 days) to strengthen the abilities of the staff in charge of implementing the policy (with special emphasis on the promotion of tolerance towards organizations and people who criticize the company.).					
		2.3.7 Define the contents and methodology to train workers on their fundamental rights.					
		2.3.8 Train workers on their fundamental rights, based on the content and methodology designed.					
	2.4 Promote dignified and respectful conditions for workers to ensure access to safe and hygienic facilities in accordance with best industry practices.	2.4.1 Complete the renovation of all workers' housing sites to standardize living space in all dormitories (3.8 meters per worker).					
		2.4.2 Refurbish damaged infrastructure in housing sites.					
		2.4.3 Monitor maintenance of hygienic conditions in housing sites.					
		2.4.4 Evaluate vital spaces on a regular basis to ensure 3.8 mts ² per worker.					

		2.4.5 Supervise the water purification system operation to guarantee access and supply of drinking water for all workers in the workplace.					
		2.4.6 Periodically monitor the quality of water for human consumption.					
		2.4.7 Finalize biometric systems installation to record work entry time of company's operational workers.					
		2.4.8 Evaluate periodically internal and external transportation services to verify coverage and quality in workers transportation.					
<u>3. ENVIRONMENTAL MANAGEMENT</u> <i>Natural resources for the production of palm oil are managed responsibly by the company, based on best practices for the mitigation of possible impacts to the environment (water, soil and atmosphere).</i>	3.1 Protect and restore key conservation values to recover biological diversity.	3.1.1 Register Tamarindo conservation area within the system of private natural reserves.					
		3.1.2 Establish a monitoring mechanism for biodiversity in REPSA's conservation areas.					
		3.1.3 Implement a forest management plan of riparian zones according to best practices and legal requirements.					
	3.2 Manage responsibly water resources.	3.2.1 Execute plans / activities contained in the Wastewater Technical Study for ordinary Wastewater Treatment Plants (PTAR).					
		3.2.2 Conduct four efficiency monitorings of PTARs (two internal and two external).					
		3.2.3 Implement a wastewater management program for palm oil mill effluent (POME) in the Special Wastewater Treatment Systems (STAR) and reuse of the treated water in the palm plantations.					

		3.2.4 Record, monitor and conduct efficiency and quality analysis of water treated in STAR.					
		3.2.5 Check the efficiency of the wastewater treatment systems (STAR and PTAR).					
		3.2.6 Develop a participatory program with local communities and other stakeholders for monitoring water quality of water bodies adjacent to REPSA's operation.					
		3.2.7 Execute the participatory program to monitor water quality.					
		3.2.8 Communicate periodically the results of STARs efficiency analysis to stakeholders, including designs, studies and corresponding permits.					
	3.3 Establish the strategy to communicate to government institutions and stakeholders about the implementation of environmental management plans contained in the environmental instruments.	3.3.1 Comply with the administrative requirements of the 8 environmental instruments of the company (6 agricultural and 2 industrial) before MARN and CONAP.					
		3.3.2 Implement environmental management plans in accordance with the environmental resolutions of the approval.					
		3.3.3 Structure the Visits Program to present REPSA's Environmental Best Practices in agricultural areas and mills to communities and other stakeholders.					

		3.3.4 Implement the communities and local stakeholders' visits program.					
	3.4 Responsible handling of waste and solid waste and agrochemicals use.	3.4.1 Implement the Waste and Solid Waste Comprehensive Management Plan in each area of the operation.					
		3.4.2 Twice a year evaluate the efficiency of the plan, focused on Reduction, Reuse and Recycling criteria.					
		3.4.3 Review use of chemicals in the agricultural operations by identifying strategies for reducing the use of synthetic products.					
		3.4.4 Every six months, update the list of chemicals allowed in palm operations.					
		3.4.5 Carry out a training and awareness program on responsible use of chemicals for company's staff ("aplicadores").					
		3.4.6 Carry out a training and awareness program on responsible use of chemicals for company's fruit (FFB) suppliers.					
		3.4.7 Communicate the list of products allowed in the palm plantations (internally and with FFB suppliers) to ensure third-party plantations do not use prohibited products.					
		3.4.8 Perform quarterly inspections in internal warehouses and those of FBB to check chemicals stocks, records of use and application of chemicals controls.					

	3.5 Reduce greenhouse gases, odors and particulate matter emissions in the palm oil operation.	3.5.1 Prepare the Carbon Footprint for the quantification of Greenhouse Gas (GHG) emissions and update the Plan de Reduce Emissions.					
		3.5.2 Perform at least two annual air quality monitorings in the mills and the communities of El Pato and La Torre.					
	3.6 Promote best agricultural, environmental and social practices in third parties' plantations.	3.6.1 Create the communications and advisory team on best Agricultural and Socio-Environmental practices for third parties.					
		3.6.2 Structure the action plan for training FFB suppliers on sustainable production practices.					
<u>4. CONTRIBUTION TO LOCAL DEVELOPMENT</u> <i>The company contributes to local development.</i>	4.1 Strengthen capacities of community leaders in the area of influence.	4.1.1 Implement a leadership workshop for COCODES, young people, agricultural promoters and health facilitators.					
	4.2 Implement comprehensive and inclusive human development training programs.	4.2.1 Train health promoters on the rational use and disinfection methods of water for consumption.					
		4.2.2 Implement plans for lot and Housing Management.					
	4.3 Support the Ministry of Education in the implementation of "Comprehensive Schools Program".	4.3.1 Donate food to schools to support nutritional project (450 students benefitted).					

	4.4 Continue investing in education, water, and sanitation infrastructure projects.	4.4.1 Carry out water and sanitation projects in neighboring communities.					
		4.4.2 Carry out health infrastructure projects in neighboring communities.					
		4.4.3 Carry out school perimeter fencing projects to contribute to the safety of students in neighboring communities schools.					
		4.4.4 Carry out classroom building projects to provide dignified facilities in schools in neighboring communities.					
	4.5 Increase the number of permanent jobs to contribute to generate employment among the Sayaxché local population.	4.5.1 Design the methodology to develop Local Employment Plan.					
		4.5.2 Implement the methodology to develop Employment Plan (stakeholders perspectives and analysis of assessment's findings).					
		4.5.3 Execute Employment Plan (socialization process and implementation of recommendations).					