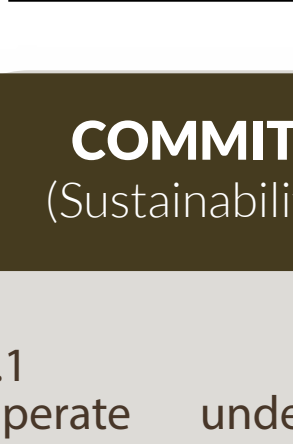




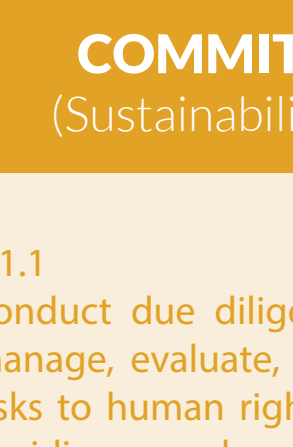
GRUPO
HAME

Sustainability Action Plan Palm 2022



1. Governance

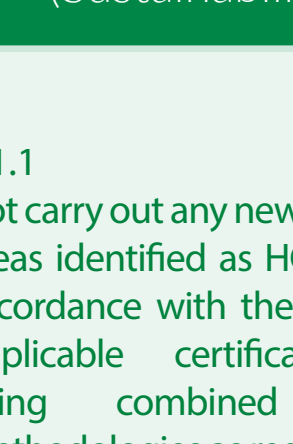
COMMITMENT (Sustainability Policy)	SDG	2025 GOAL	2022 TARGET	STRATEGIC ACTIONS 2022
1.1 Operate under a solid corporate governance structure with committed leadership that has clear direction and strategic influence; ensure objectives are achieved, accountability is enforced and relationships with stakeholders are strengthened, for the integration and effective management of this policy.	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Guarantee good performance of our sustainability governance structure for the efficient management of the Sustainability Policy (ongoing goal).	100% of the sustainability governance structure operating at the local level.	Conduct monthly reviews of sustainability key performance indicators in each operation.
1.2 Conduct its business with integrity, honesty, and transparency while adhering to the principles described in its internal regulations and procedures. Constantly engage in dialogue and collaboration with stakeholders, implementing accountability initiatives, as well as carry out responsible and ethical communication.	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Strengthen our communications strategy, dialogue and accountability to build long-term relationships with stakeholders (ongoing goal).	>80% satisfaction from stakeholders regarding the quality and quantity of information received.	Design satisfaction surveys for prioritized stakeholders according to the 2022 Communications Plan. Implement survey. Analyze survey results. Present results to the Board Committees.
1.3 Strictly comply with all the national and international standards, laws, and current regulations that apply to its operations.	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Ensure our operations are in permanent compliance with the applicable norms and legislation (ongoing goal).	90% execution of the Legal Compliance Plan (implementation of the monitoring system).	Update and validate legal requirements applicable to the Group Identify operational risks and establish controls Design 1st phase of the compliance monitoring system
1.4 Guarantee 100% traceability to plantation (TTP) in order to mitigate any potential social and environmental risks of its supply chain.	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	100% traceability to plantation -TTP- (ongoing goal).	100% traceability of FFB suppliers.	Continuously update the geodatabase of each operation with geographic locations. Validate FFB suppliers of each operation. Use the Geographic Information System (GIS) to validate new FFB suppliers. Carry out traceability to plantation testings in the operation. Admit new suppliers into the system.
1.4.1 Require all suppliers to comply with the Group's internal regulations and current applicable laws through guidance and accordance with our Program for Suppliers' Development and our Anti-Bribery Management System.	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	100% of suppliers in compliance with the sustainability standard of our Suppliers Development Program.	80% of suppliers are participating in the Suppliers Development Program and are evaluated regarding compliance and sustainability management.	Send self-assessments surveys to type B suppliers. Define type A suppliers' Action Plans. Analyze compliance goal for type A suppliers, based on the results of their 2021 self-assessment. Evaluate self-assessment results of type B suppliers. Request an Action Plan to each type B supplier.



2. Human Rights

COMMITMENT (Sustainability Policy)	SDG	2025 GOAL	2022 TARGET	STRATEGIC ACTIONS 2022
2.1.1 Conduct due diligence to identify, manage, evaluate, and remedy the risks to human rights. This includes avoiding and preventing any potential impact derived directly from its own activities, products and services of its business relationships, that violates employees, surrounding communities and stakeholders' human rights, as well as remedy when appropriate.	11 SUSTAINABLE CITIES AND COMMUNITIES	Due diligence processes in all operations to identify and manage impacts on human rights of employees and communities in the area of influence caused by our current and future activities.	>90% execution of Impact Mitigation Plans.	Monitor the execution of the Impact Mitigation Plans. Participatory monitoring stakeholders visits to the operations.
	8 DECENT WORK AND ECONOMIC GROWTH	100% of the employees and suppliers are trained and committed to respect human rights.	>80% of operative staff trained on Human Rights. >80% of administrative and managerial staff trained on Human Rights.	Apply the Grievance Mechanism procedure to address all cases.
2.1.2 Respect cultural identities, traditions, practices, and beliefs from local and indigenous communities using procedures like the FPIC as it deems applicable.	10 REDUCED INEQUALITIES	Implement the FPIC internal procedure in 100% of the communities of the area of influence where applicable (ongoing goal).	Guarantee respect for customary rights: 100% of valid passing permits working.	Execute Stakeholder Communication Plan.
2.1.3 Apply the group's internal procedure to address complaints, grievances, and queries from employees, surrounding communities, and stakeholders.	8 DECENT WORK AND ECONOMIC GROWTH	100% of cases are addressed, resolved, and recorded according to the internal procedure of the Grievance Mechanism.	100% compliance with the procedure to address, resolve and record cases.	Execute Human Rights Training Program.
Follow through with remediation if necessary and carry out periodic evaluations to this procedure in an effort for continuous improvement.			100% of new employees receive training on sustainability and Human Rights.	Provide initial training to 100% new employees.
2.1.5 Any kind of retaliation towards any person is prohibited and Human Rights Defenders are respected.	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	0 cases of threats to Human Rights Defenders reported (ongoing goal).	0 confirmed cases related to human rights defenders.	Update participatory mapping to identify passing permits. Communicate the FPIC internal procedure and passing permits to management and security staff. Communicate the FPIC internal procedure and passing permits to community members and local stakeholders.
2.2.1 Guarantee a respectful treatment to its employees and prohibit discrimination due to race, age, religion or beliefs, gender, disability, sexual orientation, pregnancy, nationality, or any other reason during the recruitment and hiring process or in promotion and termination, with an equal opportunities approach.	8 DECENT WORK AND ECONOMIC GROWTH	0 discrimination during recruitment, hiring, promotions and retirement processes.	100% of complaints addressed and resolved according to the timeline of the Grievance Mechanism procedure.	Design Grievance Mechanism 2022 Audit Program. Carry out / commission the audit. Submit audit reports to the appointed committees: Compliance, Strategic Projects, and Assurance of the Grievance Mechanism. Design the Action Plan to close the gaps identified in the audits. Identify, implement and communicate remediation plans.
2.2.2 Neither child labor nor child exploitation of any kind is permitted.	8 DECENT WORK AND ECONOMIC GROWTH	0 findings of presence of minors in the operations (ongoing goal).	100% of the sanctions applied to resolve cases are based on the Disciplinary Procedure.	Monitor cases to ensure they are resolved in compliance with the deadlines established in the GM procedure. Apply sanctions -when appropriate- in accordance with the Disciplinary Procedure.
2.2.3 Exploitation, labor trafficking and forced or bonded labor is not tolerated nor promoted. Comply strictly with ordinary working hours and overtime established in the national legislation, international treaties ratified by the country and voluntary certification standards. Personal identification documents are not withheld from employees.	8 DECENT WORK AND ECONOMIC GROWTH	0 exploitation, labor traffic, forced labor or bonded labor in the operations.	100% of complaints addressed and resolved according to the timeline of the Grievance Mechanism procedure.	Apply the Grievance Mechanism procedure to address all cases.
2.2.4 Provide information on working conditions to its employees along with a copy of their work contract. Provide salaries, benefits, and other decent, fair and equitable working conditions for temporary and permanent employees in compliance with current legislation, voluntary certification standards and internal policies.	8 DECENT WORK AND ECONOMIC GROWTH	100% of the operations comply with the applicable regulations on working conditions.	100% execution of the Action Plan to address findings of the 2021 labor due diligence.	Design the labor gaps Action Plan (to address findings of the 2021 due diligence). Present the Action Plan to the Board for approval. Execute the Action Plan.
2.2.5 Adopt best practices to promote a safe and healthy working environment that prevents incidents, accidents and/or occupational illnesses. Provide the necessary tools and equipment for every employee to perform their tasks safely and with occupational hygiene. Train and supervise the correct application of safety protocols for work according to local regulations and international standards.	3 GOOD HEALTH AND WELL-BEING	Reduce the Disabling Injury Rate in 50% (baseline year: 2020).	Reduce Disabling Injury Rate in 10% (average) REPSA <0.98 SANTA ROSA <1.26 EL TRIUNFO <0.27 ATLANTIDA <1.76 Reduce Occupational Illness Rate in 10% (average). REPSA <1.38 SANTA ROSA <0.86 EL TRIUNFO <0.72 ATLANTIDA <1.30	Execute the Plan to Reduce Workplace Accidents. Ensure implementation and compliance with the operational controls defined in the occupational risk matrices. Implement Preventive Medicine Plan focused on the prevention of occupational illnesses.
2.2.6 Promote gender equality and women's rights in accordance with the applicable legislation.	5 GENDER EQUALITY	100% of the palm oil operations have gender assessments and Action Plans.	100% of palm operations have gender assessments and Action Plans.	Perform gender assessments in all operations. Analyze assessments results and design Action Plans. Present the Action Plan to the Board for approval. Execute Action Plans.
2.2.7 Any indication of sexual or work harassment, abuse of power, threats, intimidation, use of physical, verbal, or psychological violence against employees or any member of the communities in the area of influence is not tolerated.	8 DECENT WORK AND ECONOMIC GROWTH	100% of the operations are free from sexual or workplace harassment, abuse of power, threats, intimidation, and violence of any kind.	>80% knowledge of the awareness / communication campaign.	Carry out an awareness campaign using internal and external communication channels. Conduct a survey to measure knowledge / perceptions on the issues addressed by the campaign. Analyze survey results and define follow-up actions.
		0 confirmed cases of harassment and intimidation.		Apply the Grievance Mechanism procedure to address all cases.

* Commitment 2.1.4 is reported directly to the Strategic Projects Committee of the Board of Directors.



3. Environment

COMMITMENT (Sustainability Policy)	SDG	2025 GOAL	2022 TARGET	STRATEGIC ACTIONS 2022
3.1.1 Not carry out any new developments in areas identified as HCV and/or HCS in accordance with the principles of the applicable certification standards, using combined HCV-HCS-FPIC methodologies as required.	15 LIFE ON LAND	100% of the new developments are aligned to the Internal Procedure for New Plantations (ongoing goal).	100% of the new developments are carried out following the Internal Procedure for New Plantations.	Communicate the Procedure for New Plantations to management and mid-level positions. "In case of new plantations: manage and coordinate the Environmental Instrument, Environmental Resolution, and Environmental Licence (permit). HCV and HCS studies
3.1.2 Protect and monitor the biodiversity of species that inhabit the zones where it operates, while working to preserve HCV areas.	15 LIFE ON LAND	0 loss / deterioration of HCV + HCS areas in the operations and in associated suppliers' operations (ongoing goal).	0 loss / deterioration of HCV areas.	Update HCV Management and Conservation Plans. Communicate the HCV Management and Conservation Plan to management and mid-level positions. Execute Management and Conservation Plans; and monitor HCVs identified within operations. Train district heads, supervisors and farm administrators on HCV management. Communicate the Wildlife Protection Procedure to the agricultural area. Make quarterly reports of wildlife species sighting.
3.1.3 Identify the land use type and delimit areas with fragile soil, such as high slopes, riverbanks, and peatland, defining actions to avoid physical degradation.	15 LIFE ON LAND	0 plantations in areas with fragile soil -high slopes, river banks, peatland (ongoing goal).	0 plantations in fragile soil.	Update the Surface Waterbodies Plan. Analyze usability maps. Generate report of fragile soils in operations. Develop fertigation application maps. Execute maintenance plans for riparian zones.
No development of plantations in peatland, regardless of its depth; and in case of having plantations in peatland, the Group will apply the best agricultural practices.				
3.1.4 Apply the group's Internal Procedure for New Plantations for every new plantation. No use of fire or controlled burning to prepare new areas nor to renovate existing plantations.	15 LIFE ON LAND	0 use of fire or controlled burning for soil conditioning or renovation (ongoing goal).	0 areas use fire for controlling renovation, or for any other purpose.	Socialize the environmental commitments established in the Sustainability Policy and the prohibition of the use of fire with management and mid-level positions.
3.2 Identify, prevent, and minimize the environmental impacts from its operations by incorporating technologies and responsible processes that rationally use the resources to maximize efficiency and to ensure general availability.	15 LIFE ON LAND	100% of the environmental impacts included in the environmental commitments are mitigated according to legal requirements (ongoing goal).	100% of the operative impacts included in the environmental commitments are mitigated.	Update Environmental Management Plans (PGA in Spanish). Verify compliance with environmental commitments within the PGA and approved environmental resolutions. Generate annual report on the execution of the Environmental Management Plan.
3.2.1 Maintain a soil preservation program that reduces hydric and wind erosion, make rational use of fertilizers and control organic matter in the soil.	13 CLIMATE ACTION	TBD: work in progress (will be defined according to the baseline).	Establish the baseline to assess soil loss by water erosion.	Create location maps of demonstration plots. Select sample of demo plots. Implement methodology in demo plots. Monitor implementation. Analyze results and determine baseline.
3.2.2 Implement a plan for the integrated waste management of residues and solid waste (reduce, recycle, reuse, and responsible final disposition).	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	Reduce waste in >25% (baseline year: 2019).	Reduce waste in >6%.	Execute and verify compliance with the Waste Management Plan. Implement the Waste Reduction Plan. Execute waste management training program.
		Increase recycling in >7% (baseline year: 2019).	Increase recycling in >5%.	Ensure execution of the Waste Reduction Plan.
3.2.3 Calculate greenhouse gases (GHG) emissions periodically and implement actions for its progressive reduction by adopting mitigation practices and technology according to operative and financial possibilities.	13 CLIMATE ACTION	Reduce GHG emissions by 5% (baseline years: 2020 & 2021).	1% reduction of total GHG emissions.	Execute GHG Reduction Plan. Perform annual GHG emission assessment.
3.2.4 Improve efficiency in the use of fossil fuels and promote the use of renewable energy.	7 AFFORDABLE AND CLEAN ENERGY	At least 10% of the energy used by the operations comes from renewable sources (baseline year: 2020).	Generate renewable energy (biomass and biogas) based on the annual production of each operation.	Continue cogenerating energy with biomass. Continue cogenerating energy with methane gas. Continue using energy for irrigation efficiently.
3.2.5 Make efficient, rational and responsible use of water resources. Guarantee that wastewater derived from processes is duly treated and complies with local and applicable regulations.	6 CLEAN WATER AND SANITATION	Implement the Comprehensive Water Management Plan of each operation. TBD: work in progress.	Calculate the water footprint of all palm oil operations Water consumption in plantations. (sprinkler irrigation) Santa Rosa < 1700 m3 / has month El Triunfo < 2.10 m3 / MT FBB Atlántida < 2.10 m3 / MT FBB REPSA < 1.90 m3 / MT FBB (capillary irrigation) Santa Rosa < 5300 m3 / has month	Establish the methodology and calculation system to define the water footprint (baseline). Measure volume of irrigation processes. Maintain the irrigation system to ensure efficiency. Train management on the efficient use of water for agricultural and industrial processes.
		TBD: work in progress.	Water consumption in mills. Santa Rosa < 2.10 m3 / MT FBB El Triunfo < 2.10 m3 / MT FBB Atlántida < 2.10 m3 / MT FBB REPSA < 1.90 m3 / MT FBB	Keep records on volume measurement.
		Ensure permanent compliance with the commitments adopted in the watershed committees regarding the use of water in the operations (ongoing goal).	100% compliance with commitments on water use in the Nahualate, Madre Vieja and Ocosingo river committees.	Actively participate in the River Committees in the areas of influence of the operations. Submit the registered water intake permit to the Private Institute for Climate Change Research (ICCI). Request compliance report to the ICCI.
		Ensure permanent compliance with applicable regulations for wastewater treatment (ongoing goal).	Ensure 100% compliance with the applicable regulations for wastewater treatment -AG 235- (ongoing goal).	Conduct semi-annual monitoring of water quality by an external laboratory.
3.2.6 Any use of pesticide will be carried out under an integrated pest management plan, promoting reduction in the use pesticides according to the possibilities and conditions of the plantation.	15 LIFE ON LAND	Reduce consumption of agrochemicals in: REPSA: 5% SANTA ROSA: 5% TRIUNFO: 17% ATLANTIDA: 8%	Reduce consumption of agrochemicals in: REPSA: 2% SANTA ROSA: 2% TRIUNFO: 7% ATLANTIDA: 3%	Increase the use of biological insecticides. Increase the coverage area of nectar plants. Test new phytosanitary products. Perform weed sampling according to the established procedure. Train agricultural staff on Integrated Pest Management.
3.2.6 Not use pesticides classified as type 1A or 1B by the World Health Organization (WHO), as well as those on the lists of the Stockholm and Rotterdam conventions, and paraquat; except for occasions verified through due diligence, or in accordance with government regulations for pest outbreaks.	13 CLIMATE ACTION	0 Use of paraquat and type 1A or 1B pesticides (ongoing goal).	0 ml of paraquat and type 1A or 1B pesticides used.	Verify lists of chemical products used in the operation.

Grupo HAME reaffirms its commitment to sustainability and continuous improvement, in order to keep creating economic, social and environmental value in all the areas where it operates.



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Grievance Mechanism
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