



Land Use Policy

Planting Naturals BV is a Dutch organization, dedicated to the collection, processing and trading of organic and sustainable palm oil. The company works with a social and inclusive business model, in which thousands of small farm holders are trained in organic agriculture practices and benefit from agronomic advisory, environmental education, social and cultural events, and support in the compliance with national laws.

Our land use policy will serve to prevent any conflict in relation to land use and preserve the associated rights of the local inhabitants. This policy will delineate our methods of conflict prevention and will provide the current owners and occupants of the land with appropriate information relating to their participation and collaboration with the Planting Naturals.

- ❖ Planting Naturals will ensure the affected parties are given free, prior and informed consent (FPIC), when in consultation for the development of any projects. We will not pursue projects where the communities have been denied this consent process or having undergone it, they have not given their consent.
- ❖ Planting Naturals works with independent smallholders, who are not bound by any contract, credit agreement or panning to the company's mill. The farmers are free to choose what to grow on their land and where to process their products.
- ❖ The leasing of land for our future operations will not diminish the legal, customary or user's rights, including those that may rely on the land access for their livelihoods (especially women). We will endeavour to fully communicate all the possible impacts of land conversion to the affected communities. This will be done by sensitising the local communities to the potential costs and benefits of a potential Planting Naturals project.
- ❖ We will strive for complete transparency when completing land lease arrangements. Our consultations and negotiations will include a high proportion of women, as we recognise that although women may not have legal or even customary rights to the land in question, they depend on land access for their livelihoods and for food security of their families and communities.

- ❖ We shall provide all relevant information in appropriate forms and languages, including but not limited to impact assessments, proposed benefit sharing and legal arrangements. All leases and Memorandums of Understanding (MOUs) will be provided to all signees, and accessible at any time through a mobile accessible web site.
- ❖ We will respect and support the rights of the local community to access land for food, nutritional and religious security. An effective environmental management system will be implemented to protect land, water and vegetation in our lease areas. The protection of local resources, waters sources, medicinal plants and wildlife will be critical for the overall health of the affected communities.
- ❖ Planting Naturals expressly prohibits the use of mercenaries and paramilitaries in any of our operations. In addition, any contracted security forces are forbidden from engaging in extrajudicial intimidation or harassment. We will not tolerate any traditional or local authorities, coercing or threatening local communities on behalf of Planting Naturals.
- ❖ Local communities should have access to independent legal representation, to assist them with the negotiation of their interests and to ensure fair compensation and consent with the lease agreements.

Reporting of Transgressions

Planting Naturals encourages the reporting of any transgressions against this policy.

All **employees** of the group should address such reporting primarily to their supervisor. If the supervisor is part of the issue, the matter should be addressed directly to the head of the relevant business unit or the group sustainability department. All communication will be treated as confidential and will not result in any disciplinary action or retaliation against the persons making them.

External stakeholders are advised to report any breach of this policy to the company. The grievance procedure, presented below, was developed with the help of Sierra Leonean non-profit organisation Namati. It establishes a direct communication channel, which ensures the proper management of grievances and complaints by communities and any other stakeholders who are affected by our operations.

Grievance Redress Mechanism

1. *Receiving complaints from communities:*

- 1.1. **Raised in formal or informal community meetings** - at every community/company gathering, participants are asked to raise specific grievances and the grievance officer records them and acknowledges receipt.
- 1.2. **Call the GRM telephone line** – the company provides and publicises a telephone number, which community people with grievances may call.
- 1.3. **Walk to company's offices** – a complainant can walk into the company's office to explain his/her grievance and have it recorded.
- 1.4. **Through other staff of the company** – all staff of the company is trained to note down complaints made to them in the field and refer them to the grievance officer.

Note:

- A grievance/complaint can be made by an individual or by a group or by an entire village
- All grievances/complaints should be recorded by the grievance officer and an acknowledgment issued.

2. *Assessment, acknowledgement and recording of grievance:*

- 2.1. It must be determined at what level the grievance can be dealt with and whether it is in fact within the company's remit.
- 2.2. The grievance officer should assess whether the grievance is a **complaint**, a **suggestion** or a **request** and assign it to the appropriate process. Suggestions do not generally require a resolution but there must be a response.
- 2.3. It should be determined whether the grievance is **urgent**. Most grievances are addressed within a 2-4 week timeline. Other issues may need to be dealt with at a higher level or faster pace. A fast track process can be used to avoid any potential crisis.
- 2.4. Grievance officer determines **who** needs to deal with the grievance (management, HR team, community relations, etc.). Community grievances are best managed by the community relations department than the general administration department. For all grievances, the grievance officer takes the lead.
- 2.5. All grievances/complaints must be acknowledged as soon as they are received. The grievance acknowledgement form is filled out and sent to the complainant. If the grievance has been received verbally, the grievance officer or staff receiving the complaint will record it and acknowledge receipt.
- 2.6. The grievance is recorded on the company grievance form, the grievance book and may be entered into an electronic database.
- 2.7. If for obvious reason(s) the grievance/complaint does not fall within the company's remit, it is referred to other grievance redress structures such as the chieftom grievance and development committee, the Land Owners Committee, the conflict resolution committee, local court etc.

3. *Investigation of grievance:*

- 3.1. The investigation process must ascertain the facts of the complaint and use these facts in a neutral manner to propose suitable resolution.
- 3.2. The investigation may include, talking to complainants, witnesses, site visits, collection and review of documents, risk and situation assessment and meetings with community stakeholders.
- 3.3. Anonymous grievances/complaints will be investigated.
- 3.4. The department that the grievance relates to must be included in the investigation.
- 3.5. Serious and conflict-threatening grievances may require immediate intervention. Senior management should be involved to fast track the process.
- 3.6. The expected outcome of an investigation is a **process establishing the facts of the situation and then a suggested resolution**. The facts must all be documented along with the identities of those involved in the investigation.
- 3.7. In some instances, the issue will be sensitive and or confidential and may relate to management. In such situation, it will be at senior management's discretion regarding who investigates such grievance and how decisions would be made at the conclusion.

4. *Resolution:*

- 4.1. The resolution must be based on the law, company standards, policies and criteria.
- 4.2. The resolution of the grievance will be presented to the complainant and other relevant stakeholders. The complainant will be invited to discuss whether the outcome is satisfactory. Upon failure to reach a satisfactory outcome other actions will be taken. These actions may include further dialogue and mediation or legal proceedings.
- 4.3. Anonymous grievances will usually be regarded as closed once a resolution is proposed. In some cases, it may be appropriate to inform the community about follow-up measures that are being taken for an anonymous grievance.
- 4.4. All proposed resolutions should be documented in the grievance record book and entered into the electronic database. The signed (or thumb-printed) grievance resolution form should be attached to the grievance file, preferably with a photograph of the signing.

Grievance Redress Mechanism Flowchart

