FREE PRIOR INFORMED CONSENT OPERATING STANDARD
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I. PURPOSE AND SCOPE OF APPLICATION

The establishment of plantations can imply major changes for local communities and indigenous people. Plantations require large area of land and often this land is owned and used by local communities.

International human rights laws and business best practices, recognize that even where national frameworks may provide weak or absent protections of customary rights to land, plantations should not be established on indigenous peoples’ land without recognition to their prior rights to the land. The principle which encapsulates these rights is Free Prior Informed Consent (FPIC). The FPIC has been endorsed by the RSPO as a key principle in its principles and criteria (P&C).

SIPH Group in Policy, pledged to respect and recognized the long-term customary and individual rights of indigenous and local communities and committed to ensuring legal compliance as well as international best practices in FPIC are implemented.

- Commit to secure FPIC prior to any new acquisition and extension.
- Present the main steps to follow in the land acquisition process in accordance with general FPIC requirements and local realities.
- Commit to address previously caused harms and commit to monitoring, and accepted methodologies. The Implementation will be jointly monitored by the community and SIPH and/or by mutually agreed third party(ies).
- List the main stakeholders involved during the process
- Set up representatives of the communities for regular dialogues with communities
- Catch in time all grievances related to the land acquisition, land clearing, planting and other processes involving local communities
- List all the documents to be produced and archived during the process.
- Commit to secure mutually agreed measures should operations impinge on IP/LC rights.

This procedure covers the land acquisition process, including the participatory mapping, negotiation, compensation, conflicts management and monitoring.

II. REFERENCE DOCUMENTS

- Roundtable for Sustainable Palm Oil (RSPO)
- SIFCA Sustainability policy
- SIPH Sustainable Rubber Policy
- IFC Performance Standards ON Environmental and Social Sustainability

III. RESPONSABILITY

The sustainability department is in charge of the implementation of the procedure, with the support of Top management.
IV. CONTENT

1. Pre-FPIC SWOT/risk assessment of targeted area (political/conflict, land suitability, ...)
   (SD, EM, MD, ...)

2. Are there local communities (landlord communities)?
   NO FPIC

3. Identification of communities
   Representative communities (Communities)

4. Outreach meetings
   (SD, social team, GIS)

5. Participatory mapping
   (social team, GIS, CIC)

6. Do the communities want the projects?
   NO
   END
   YES

7. 1st agreement

8. Do the communities want the projects?
   NO
   END
   YES

1st agreement

Lands overlaps
Right holders
Representation
Impact (ESIA, HCV, ...)
Benefits (job, development, ...)
Finances (provisions)
Risks
Legal implications (life span of the company)
Negotiation and proposals

2nd agreement

YES
NPP process (SD)

Compensation payment (SD, CAM, CLC, Farms owners)

Finalize the agreement
Get the agreement endorsed by legal institutions
(Management, CLC, government)

Community consensus Building

Negociation process

Do the communities want the projet ?

3rd agreement

- YES
  - Finalize the agreement
  - Get the agreement endorsed by legal institutions
    (Management, CLC, government)

- NO
  - END

Land preparation, Implementation of the agreement,
Implementation of the EMS
(Operation, SD, CAM, CLC)

Participatory monitoring
(Operation, SD, CAM, CLC)

Management of Grievances and complaints
(Operation, SD, CAM, CLC)

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### a. FPIC associated documents

<table>
<thead>
<tr>
<th>N°</th>
<th>Documents to be issued before meetings</th>
<th>Documents issued/endorsed after meetings or negotiations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Invitation letters (key stakeholders)</td>
<td>Copies of acknowledgment of receipt of invitation letters, reports or meetings minutes, map of existing communities around the targeted area</td>
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<tr>
<td>2.</td>
<td>Letter to request the list of community representative committee</td>
<td>List of community representative committee + acknowledgment letter by the company</td>
</tr>
<tr>
<td>3.</td>
<td>Invitation letter for outreach meeting</td>
<td>Minutes of the outreach meeting, attendance list.</td>
</tr>
<tr>
<td>4.</td>
<td>Letter to request the list of community representative committee</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>Invitation letter for participatory mapping</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Invitation letters for participatory mapping</td>
<td>Meetings minutes, base map and GIS map endorsed by communities</td>
</tr>
</tbody>
</table>

#### 1st agreement

| 7. | Invitation letters for participatory mapping | |
| 8. | Meetings minutes, base map and GIS map endorsed by communities | |

#### 2nd agreement

| 9. | Invitation letters for various negotiation meetings | Negotiation meetings minutes + attendance list |
| 10. | Draft copy of MoU for communities inputs | Draft copy of MoU with communities inputs or letter |
| 11. | Final copy of the MoU with communities inputs | Signed copy of the MoU |

#### 3rd agreement (Memorandum of understanding)

| 15. | List of people entitled to compensation | Payment evidences |
| 16. | | NPP submission documents (HCV, ESIA, FPIC reports,...) |
| 17. | | NPP notification |
| 18. | | Monitoring reports |
| 19. | | Complaints management base data. |