

## Environment & Social Action Plan

Task Title & Description	Completion Indicator	Anticipated Completion Date
<b>PS1 – Social and Environmental Assessment and Management Systems</b>		
Increase capacity to assess, mitigate and monitor E&S risks on all properties owned or operated by the Company	Competent E&S manager <u>appointed</u> and reporting to the CEO or Chief Forest Officer. TORs for position and c.v. of appointed person forwarded to IFC for review.	Condition of 1 <sup>st</sup> Disbursement
Consolidate all E&S impact assessments and FSC audits conducted on all properties in order to ensure that the ESMS is robust and that necessary corrective actions have been identified.	Internal review of all ESIA information for owned and managed plantations and milling operations completed and corrective action plan to close significant non-conformities provided to IFC for comment	1 <sup>st</sup> Disbursement + 3 months
Standardize forestry operating procedures and ensure that such procedures included EHS aspects of forestry and milling operations	Draft Standard Operating Procedures Manual which includes EHS requirements is <u>submitted</u> to the IFC for comments and evidenced in operations during Annual Monitoring Reporting and supervision.	1 <sup>st</sup> Disbursement + 6 months Annual Monitoring Reports (AMRs)
<b>PS2 – Labor and Working Conditions</b>		
Develop and publicly disclose corporate commitment to compliance with applicable Environmental, Health & Safety, and Labor laws in respective jurisdictions and the IFC Performance Standards	Corporate EHS Policy is <u>published</u> on the Company's website and <u>provided</u> to IFC for review and comment	1 <sup>st</sup> Disbursement + 3 months
Ensure that EHS requirements and SOPs (above) are included in contractor and supplier agreements	SOPs include provisions for <u>E&amp;S Manager Sign-Off</u> for forest operations contractor and supplier contracts; and there is <u>documented review</u> of contractor and supplier adherence to EHS requirements during AMRs.	1 <sup>st</sup> Disbursement + 6; Included in AMR
Develop workplace OHS plans and training plans and reporting systems which continuously monitor and improve workplace safety across forestry and milling operations	Corporate workplace safety review and improvement plan which includes monitoring and management review is <u>submitted to IFC</u> for review and comment;	1 <sup>st</sup> Disbursement + 3 months;
Workplace safety is periodically monitored and results reviewed by senior management	OHS Reviews are conducted on a semi-annual basis at each operating unit and reported annually to IFC in the AMR	1 <sup>st</sup> Disbursement + 6 months, annually in AMR
<b>PS3 – Pollution Prevention and Abatement</b>		
Develop procurement policies, inventory management procedures and management information systems which ensure that rationale and justified use of only legally and FSC-approved agrochemicals in all plantation operations	Policies and procedures governing the procurement, storage and application of all agrochemical (herbicides, pesticides, fungicides and soil amendments) are included in the SOPs plantation management information system routinely used and flowed down fully to contractors.	1 <sup>st</sup> Disbursement + 6 months
Establish GHG emission <u>monitoring system</u> which monitors and reports actual GHG emissions across all Company operations and drives both real-time and annual	A GHG emission monitoring system developed and specifications provided to IFC for review and comment and are reported on annually in AMR.	1 <sup>st</sup> Disbursement + 6 months, included in succeeding AMRs

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reporting of GHG emissions.		
<b>PS4 – Community Health, Safety and Security</b>		
Development of a fire risk management plan that addresses fire prevention, detection and suppression and establishes necessary budgetary allocations	Fire risk management plan and budget requirements <u>submitted to IFC</u> for review. Effectiveness of the fire risk management plan will be reviewed annually by senior management and reported within the AMR .	Condition of 1 <sup>st</sup> Disbursement ; Annually in AMR
Improve communications between field operations staff and transportation contractors and develop requirements for safety inspections of owned, leased and contracted rolling stock in order to reduce transportation-related risks associated with forestry operations.	Corporate communications and transportation safety procedures are <u>included in the SOPs</u> and routinely available to employees, contractors and affected communities and <u>assessed annually</u> by senior management and included in the Annual Monitoring Report submitted to IFC.	1 <sup>st</sup> Disbursement + 3 months; Included in AMR
Develop corporate policies and procedures for managing social engagement with affected communities, including directions for establishing site-specific operational procedures and monitoring systems	Corporate <u>social engagement strategy</u> are submitted to IFC for review and reported annually to the IFC within the AMR and FSC Surveillance Audits.	1 <sup>st</sup> Disbursement + 6 months; Annually in AMR
<b>PS6 – Biodiversity Conservation and Sustainable Natural Resources Management</b>		
Company selects and adapts a management/geographic management system (MIS/GIS) appropriate to the nature and scale of its operations which allows it to standardize information regarding site selection, choice of cultivars, agrochemical applications and management practices	Appropriate MIS/GIS system <u>selected and communicated to IFC</u> and all operating units are provided instructions on reporting requirements whose effectiveness is reviewed annually and reported within the AMR	1 <sup>st</sup> Disbursement + 6 months Annually in AMR
Ensure that all plantations are managed in compliance with applicable laws and regulations and FSC Standards within five years of their establishment.	FSC certificates for each management unit are updated and <u>published on the FSC website</u> and new acquisition certificates are dully <u>transferred to Company</u> and copies of complete assessments/audits made available to IFC.	1 <sup>st</sup> Disbursement + 6 months FSC Surveillance Audits Annually
Consistent identification and protection of any critical or natural habitats found within plantation areas is developed and used effectively within the management of current and future plantations	A <u>procedure</u> for assessing current and future plantations for high conservation value areas is <u>included in its SOPs</u> and assessed for effectiveness annually during the FSC Surveillance Audit procedures	1 <sup>st</sup> Disbursement + 3 months FSC Surveillance Audits Annually