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SUSTAINABILITY
REPORT 2015





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EPO in Liberia
Building a better future

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EPO: AN INTRODUCTION

EPO is a UK publicly listed company involved in the development of oil palm, with operations based in Liberia, West Africa.

Liberia is an excellent location for regional supply of palm oil. Nearly one million tonnes of palm oil are imported into West Africa each year, with demand continuing to grow; EPO will supply the local market, helping reduce imports and making a positive impact on the local community and regional economy. EPO currently employs 1,500 staff, around 40 per cent of whom are women, and plans to be one of Liberia's largest agricultural employers.

EPO intends to become a fully sustainable producer of palm oil through the development of its existing oil palm estates and expansion lands. EPO is in a joint venture with KL-Kepong International Limited, a subsidiary of Kuala Lumpur Kepong Berhad (KLK); KLK is one of the largest palm oil producers in the world, and EPO expects to benefit greatly from its many years of expertise in oil palm development.

EPO has prioritised community relations and CSR in its work in Liberia from the start, making significant investment in local communities and infrastructure, constructing—among other things—water pumps, culverts, roads and bridges; and building, maintaining and running schools and health clinics.



EPO IN LIBERIA: AN OVERVIEW

EPO has signed two concession agreements in Liberia.

Both of these estates were previously oil palm estates, though both had fallen into disuse since the years of political and economic instability that followed two violent civil wars (1989-1996 and again 1999-2003). Current concession agreements were signed on 21 December 2007 and came into force on 6 August 2008.

The Palm Bay estate, a two-hour drive from Monrovia in Grand Bassa County, comprises 13,007 hectares of land as part of the concession, as well as expansion areas totalling 20,234 hectares. Of the latter, 50% is set aside for outgrower programmes. The concession was enacted into law for 50 years by the Parliament of Liberia in 2008. Palm Bay is only 25 kilometres from the deep water port of Buchanan, which now functions as a fully operational port.



The Butaw Estate, a short drive from the coastal town of Greenville in Sinoe County, comprises 8,011 hectares of land as part of the concession as well as expansion areas totalling 46,539 hectares of which 15,680 hectares is set aside for outgrower programmes. Butaw is also a 50 year concession and was enacted into law by the Parliament of Liberia in 2008. Greenville has deep water port facilities.

EPO AND THE ROUNDTABLE ON SUSTAINABLE PALM OIL (RSPO)



Global palm oil producers 2015

As a central tenet of its work, EPO is a member of the international body tasked with promoting sustainable palm oil production: the RSPO.

Oil palm is cultivated commercially in tropical areas of Asia, Africa and South America, and there are environmental, social and economic pressures on its further expansion. EPO adheres to strict sustainability standards for two reasons: to remain attractive to investors in the global palm oil market and within its supply chain; and to make a positive environmental and social investment that cultivates excellent relationships with the company's host communities.

The RSPO¹ was formed in 2004 to promote the growth and use of sustainable palm oil products through credible global standards and engagement of stakeholders. The RSPO is currently the main sustainability standard for the global edible oil industry, making palm oil the only edible oil produced on a large scale that adheres to stringent social and environmental standards.

1 <http://www.rspo.org/about/how-we-work>

EPO has been a member of RSPO since 2007, and fully supports the RSPO's vision to transform palm oil markets to ensure that sustainable palm oil is the norm. EPO's policies and procedures are therefore designed in accordance with the eight RSPO Principles:

The Eight RSPO Principles:

1. Commitment to transparency
2. Compliance with applicable laws and regulations
3. Commitment to long-term economic and financial viability
4. Use of appropriate best practices by growers and millers
5. Environmental responsibility and conservation of natural resources and biodiversity
6. Responsible consideration of employees and of individuals and communities affected by growers and mills
7. Responsible development of new plantings
8. Commitment to continuous improvement in key areas of activity

These principles, together with the 43 supporting criteria defined by RSPO, are widely recognised as the most stringent global standards for sustainable palm oil production. EPO has incorporated RSPO's principles into all its operations, and has appointed key personnel on the ground to ensure that it meets them all and reviews its performance regularly.

EPO AND THE SUSTAINABLE PALM OIL MANIFESTO

The Sustainable Palm Oil Manifesto¹ was created by key stakeholders in the palm oil industry to ensure sustainability in the entire chain of palm oil production, from cultivation to consumption. Signatories include EPO's parent company KLK.

The Manifesto builds upon signatories' existing sustainability commitments to RSPO principles, and has commissioned a scientific study to achieve three objectives:

The 3 Objectives:

1. To build traceable and transparent supply chains
2. To conserve high carbon stock (HCS) forests and protect peat areas regardless of depth
3. To increase the focus on driving beneficial economic change and to ensure a positive social impact on people and communities

1 <http://www.carbonstockstudy.com/The-Manifesto/About>

EPO AND THE HCS STUDY

A key commitment in the Sustainable Palm Oil Manifesto is the funding of a study¹ to define clearly what constitutes a high carbon stock (HCS) forest and establish HCS thresholds for palm oil cultivation that take into account not only environmental concerns but also socio-economic and political factors in developing and emerging economies where oil palm is cultivated.

The study, ongoing at time of writing, uses scientific methods to examine four key areas: biomass; soil carbon; remote sensing; and the socio-economic impact of the industry². It is overseen by a Steering Committee independently co-chaired by eminent British environmentalist and writer Sir Jonathon Porritt and Dr John Raison, former Chief Research Scientist from Australia's Commonwealth Scientific and Industrial Research Organisation (CSIRO). It has gone through transparent public consultation and peer review, and will determine appropriate methods to:

1. **Estimate carbon stock in areas where cultivation of oil palm is proposed**
2. **Assess the developmental needs of local communities and governments in regions of varying HCS stocks, favouring for cultivation the poorest areas and regions that may have higher carbon stocks and more such forests**

Observers to this process include the RSPO, IDH (The Sustainable Trade Initiative), Neste Oil, the Malaysian Palm Oil Board, the Indonesian Palm Oil Association (GAPKI), Global Environment Centre (GEC), Proforest, the Indonesian Oil Palm Research Institute (IOPRI) and the Zoological Society of London. There are also plans to engage wider stakeholder groups to ensure the study's results achieve international acceptance and are mindful of existing government land use and development policies. It is hoped that the study's findings will be integrated into existing processes and standards, such as the RSPO's Principles and Criteria.

A more detailed description of the HCS study can be found at:

<http://www.carbonstockstudy.com/carbonstockstudy/media/Documents/HCS-Study-Description-Paper.pdf>

1 <http://www.carbonstockstudy.com/HCS-Study/About-HCS-Study>

2 <http://www.carbonstockstudy.com/carbonstockstudy/media/Documents/HCS-Study-Description-Paper.pdf>



GROWTH & DEVELOPMENT

The HCS study has had a considerable impact on the development of both Palm Bay and Butaw estates. In line with the commitments made by the signatories of this study and KLK's stand on HCS areas¹, EPO has agreed to suspend all new land development at potential HCS areas.

This will continue until the results of the study are released, which at time of writing is likely to be by the end of 2015. In view of the intricacy of the study and the absence of clear and practical thresholds for HCS, EPO ceased new land development in the second half of 2014 pending further assessment of the potential HCS areas. EPO's Liberian estates, which require a great deal of new planting, will not produce at high volume until post-HCS guidance and Liberian government views are known.

The cessation of land development for EPO came at a difficult time for the company, given it had also just weathered the Ebola crisis of 2014-15, during which operations on the estates were forced to a near-standstill. Suspension of development of the land that is part of the

¹ <http://www.klk.com.my/wp-content/uploads/2015/03/FINAL-KLK-Sustainability-Policy-with-footnote-14-Jan-2015.pdf>



EPO concession has had significant knock on effects for the communities in which we operate, including setting back our targets for employment, training and development.

In the meantime, however, from a starting point where no large scale agriculture or associated activity whatsoever was taking place on its estates, EPO has made it a strategic priority to do as much positive work in and around its host communities as possible. In this way the company has strengthened and continues to work hard to strengthen further — its local foundations in anticipation of high volume production and the associated community benefits.



2015: EPO'S APPROACH TO TRANSPARENCY AND SUSTAINABILITY

EPO considers transparency a fundamental requirement for business. This includes transparency of data; transparency of reporting; and transparency of opportunity.

Such transparency, however, is not just about making EPO's workings apparent to the public; it must also be internal, which requires full awareness of all issues impacting the company. Such awareness is created by an ongoing engagement with all stakeholders, from investors to the Liberian government to fellow companies to local communities; and continuous frank assessment of past and present problems. Based on that assessment, the company makes action plans to deal with what is important.

For example: in the past two years EPO has been subject to claims of illegal land grabbing; involvement in violent suppression by Liberian Police of communities protesting against expansion of the company's estates; and breaching of international human rights law



and RSPO commitments¹. Complaints about EPO activity have been raised with RSPO by Liberian NGO the Sustainable Development Institute (SDI)². In response, EPO has met these claims head on, not only by refuting those aspects of the claims the company holds to be untrue but also by acknowledging the grievances of affected communities and working proactively with SDI, originator of the complaint, to resolve them. See page 14 for more information.

In addition, EPO has suspended all new land development on potential HCS areas while the HCS study (see page 11) is ongoing.

This study is scientific in approach, evidence-based, and subject to open transparent public consultation and peer review. Its outcomes, which will be publicly available, may go a long way toward determining the company's future planting strategy in Liberia.

On the ground, EPO has completed a survey of grievances from certain communities unhappy with land grants, working with SDI to hold community meetings that have been recorded (following agreement by all participants), and producing a written report clearly logging all issues, which has been submitted to all stakeholders for review. In 2015, EPO has worked to formalise its grievance and interaction processes with all land stakeholders over company operations and local land use. EPO is pleased to report that

1 <https://www.globalwitness.org/archive/EPO/>

2 www.sdiliberia.org



communities unhappy with land grants comprise only 4 out of the 24 towns and villages on or near the company's estates at the time of writing; this notwithstanding, the company is committed to full transparent engagement with these communities until an agreement is reached on a way forward that is acceptable to *all* stakeholders.

In allocating employment and social welfare opportunities, EPO has put in place a formalised process to ensure a wide range of individuals from different communities (including those



living outside EPO's concessions) have access to the employment, education and development opportunities the company provides. Using worker and local representative councils, EPO works to reach a wide local demographic. The success of this approach is particularly noticeable in the high uptake of the company's community adult literacy programmes by women of all ages. By working with women's representatives across a host of villages, this facet of the education programme is now thriving—a fact that takes on particular significance given that civil war caused the majority of this generation to miss out on an education.



PALM OIL AND ITS PLACE IN LIBERIA



It is EPO's fundamental belief that oil palm development is Liberia's best chance to alleviate the chronic poverty of its rural population.

West Africa contains some of the poorest nations in the world, in which citizens' daily lives are often lives of survival. Exacerbating a lack of development and infrastructure, much of the region has also been through years of conflict. Liberia's infrastructure was severely depleted by vicious civil wars that lasted from 1989 to 2003, with only a short three-year break from 1996 to 1999. Recent events have thrown the legacy of such destruction into particularly sharp relief: the 2014-15 Ebola crisis hit Liberia particularly hard at least in part because of this weakened infrastructure. At the start of the crisis, Liberia's health system had only 130 doctors for a country of 4.5 million people¹.

Liberia is now 175th out of 187 in the Human Development Index², a ranking system devised by the United Nations as "a summary measure of average achievement in key

1 <http://www.afro.who.int/en/liberia/who-country-office-liberia.html>

2 <http://hdr.undp.org/en/content/table-1-human-development-index-and-its-components>



Liberia is now 175th out of 187 in the UN Human Development Index

dimensions of human development: a long and healthy life, being knowledgeable and have a decent standard of living.” In this context, EPO sees large scale agriculture in general, and palm oil in particular, as key to Liberia’s development. No other feasible industry in the country can have equivalent positive infrastructural impact, create as many jobs—skilled and unskilled—over as long a time, or offer as great a potential for economic linkages in rural economies affected by severe poverty. The productive lifespan of a well-run oil palm plantation is multiple generations.

In this context, it is EPO’s policy that socio-economic interests and raised living standards for the communities in which we operate should be at the forefront of the company’s strategic decision-making processes.

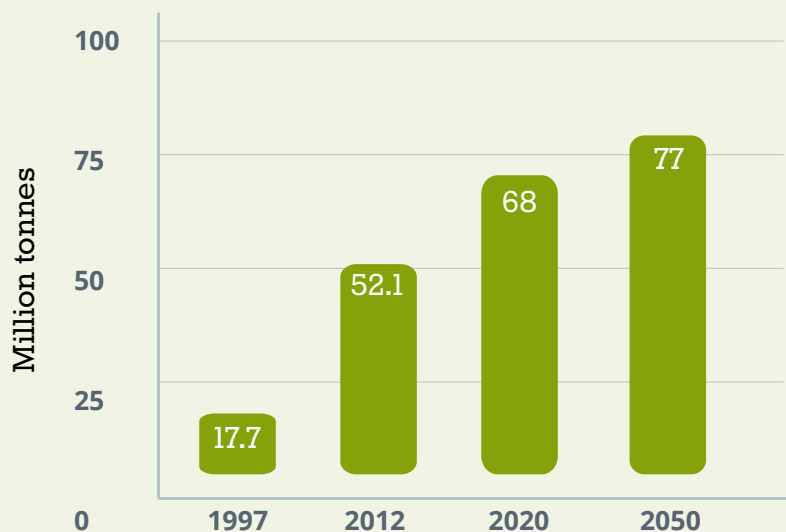
A STRONG MARKET FOR STABLE DEVELOPMENT

Palm oil is produced in response to huge worldwide consumer demand that has risen steadily for thirty years, and is the most consumed vegetable oil in the world.

It is used in a growing number of industrial processes and a wide variety of products including cooking oil, processed foods (including bread, margarine, chocolate, ice cream and other frozen foods), and consumer goods such as soap, detergents, cosmetics and pharmaceuticals. Around 40% of the top 100 food brands in the UK contain palm oil.

In the last 15 years the global demand for palm oil has more than doubled. The development of oil palm plantations is a long-term industry with widespread demand and a positive forecast for the foreseeable future, with demand by 2050 likely to be 77m tonnes per annum.

Projected global demand for palm oil:



<http://www.palmoilresearch.org/statistics.html>





Oil palm development therefore provides a solid basis for long term economic planning and development, without the boom and bust cycles typical of the extractive industries. The potential life of an oil palm plantation is open-ended, with a just a single production cycle lasting 25 years; a new planting takes 3 1/2 years from first planting in the nursery to first harvest in the field. Therefore the business case for oil palm development demands a long term commitment by producers to their host countries and communities.

BUILDING THE MARKET AND BUILDING CAPACITY: EPO'S OUTGROWERS PROGRAMME



As mentioned in the introduction, alongside the company's concession agreements the Liberian Government and EPO have committed to assist Liberian smallholders, or "outgrowers." At Palm Bay estate over 10,000 hectares are set aside for outgrower programmes; at Butaw Estate, over 15,000 further hectares are set aside for outgrower programmes.

The aim of this programme is to build local capacity in the palm oil industry and to assist community members who are farmers in making a living.



In a further effort to help boost local industry and capacity EPO will also provide support to outgrowers on a cost recovery basis. Under the terms of the concession agreements such support may include technical assistance, provision of equipment, fertilizer, processing capacity, sharing of expertise and the establishment of close working links with outgrowers. These links may include the provision of palm oil seedlings of the most scientifically advanced type grown by EPO, as well as a commitment to purchase produce harvested from the outgrowers under the terms of the concession agreement.

CERTIFIED SUSTAINABLE PALM OIL — WHY?

- **IN 2013, 15% OF THE WORLD'S PALM OIL HAD BEEN CERTIFIED AS SUSTAINABLE**
- **DEMAND FROM MAJOR COMPANIES HAS MEANT SIGNIFICANT GROWTH IN THE MARKET FOR CERTIFIED SUSTAINABLE PALM OIL**

Palm oil estates can only be grown in the tropical and sub-tropical regions of Asia, Africa and South America.

Because of rapidly increasing worldwide demand for edible vegetable oils since 1990, land used for palm oil cultivation is estimated by the RSPO to have grown by 43%. The majority of this activity has taken place in Indonesia and Malaysia, the largest producer countries for palm oil.

Though other oil crop hectareage—particularly soya bean—has increased considerably more than oil palm in the same period, this expansion has nonetheless exerted pressure on the environment and within the societies where it has taken place. Consequently there is concern that palm oil is not always being produced sustainably, that the demand for larger plantations has led to de-forestation in important conservation areas, and that there have been significantly adverse effects on areas rich in biodiversity.

Though other oil crop hectareage—particularly soya bean—has increased considerably more than oil palm in the same period, the expansion of palm oil production has nonetheless exerted pressure on the environment and within the societies where it has taken place.

Certified sustainable palm oil (CSPO) is palm oil that has been grown on a plantation that has been managed and certified according to the principles and criteria of the RSPO.

In 2013, 15% of the world's palm oil had been certified as sustainable, up from 10% in 2011. This is the equivalent of more than 8 million tonnes grown on certified estates covering 2.4 million hectares.



The market for certified sustainable palm oil:

CSPO is purchased in lieu of standard crude palm oil by major companies with sustainability policies that include a commitment to purchase only palm oil that can be shown to be sustainable.

Examples of such companies include well known retailers such as Asda (Walmart), Boots, Tesco, Carrefour and IKEA; leading food producers such as Heinz, Nestlé, Henkel and Unilever; and well known companies from other sectors, such as L'Oréal and Reckitt Benckiser. Premiums are payable for CSPO by selected buyers.

EPO's goal:

Indonesia and Malaysia produce around 85% of the world's palm oil and are the largest exporters; but there are limitations on cultivation of new areas of land in these key territories. EPO's presence in Liberia therefore presents a significant commercial opportunity to address the increasing world demand for sustainable palm oil. All of the palm oil produced by EPO will be certified sustainable.



COMMUNITY ENGAGEMENT

EPO is dependent on a positive relationship with the people who work for it and the communities that live in and around its estates.

It must be welcomed by the government as a payer of taxes and royalties, a provider of jobs and infrastructure, and a generator of revenue that Liberia needs for its continued recovery from war and further development.

It must be welcomed by regional authorities as a company that brings work, training and opportunities for advancement to Liberians.

It must be welcomed by its closest communities as a provider of opportunities to win jobs, salaried and casual; to feed families; and to build small businesses.



The average productive lifecycle of a single oil palm in Liberia is likely to be up to 30 years. 30 years is also roughly the time it takes a baby to be conceived, born, educated and professionally trained, and to find its place in the world as a working adult with skills and choices. EPO's commitment to Liberia will last literally lifetimes. The potential life of an oil palm plantation is open-ended: a plantation working sympathetically with those who live on or near it can be a part of the local landscape for generations. It can—and it should—be a real, focussed driver of local business, development and opportunity.

Where necessary, and where local communities come together to demonstrate need, EPO must help ensure the health and sustainability of these communities by also providing basic education, new infrastructure and development.

EPO must also be ready, as a fully integrated part of the Liberian landscape, to stand shoulder to shoulder with local communities in the response to unforeseen events as it did in the Ebola epidemic that began in 2014.

The desired 'social licence' to operate is not something that is applied for and granted, or won over with strategically-timed blue riband CSR projects: rather, it is the product of an ongoing effort to know EPO's host communities and the influencers within them, and respond flexibly and reliably to their needs, for as long as the company is in Liberia.

EPO'S COMMUNITY LIAISON TEAM



*Patrick M. Jallah
RSPO Documentation
Clerk*

Patrick has a breadth of experience of Liberia's resources sector; over the last 15 years he has worked for logging and iron ore companies, the UN, an environmental consultancy and local Liberian NGOs.

What are the main challenges of your job?

Getting district people to adhere to international sustainability standards.

Have you seen a positive impact since EPO came to Liberia?

Yes. The company has been an economic breadwinner for the district and Liberia in general. On a personal level, my work has expanded my own knowledge and experience.

What are your hopes for the next few years?

My hope is to acquire more knowledge through training and expand my scope of work. This will empower me to develop along with the company's development. I want to play a major role in the company's progress.

What could the company do better?

The company needs to encourage more community empowerment, in order to create positivity and dispel the effects of negative lobbying by other people.



Jasvinder Singh
RSPO Compliance
Manager

Jasvinder has been in the sustainable oil palm development scene since 2009. His job is to ensure EPO's development is aligned with internal sustainability standards (the company's sustainability policy), as well as those applicable locally and internationally (through the RSPO).

What are the main challenges of your job?

Ensuring local communities always have correct and up to date information.

What are the most satisfying successes?

Seeing local communities developing and benefiting from EPO's community-based projects, like adult literacy, free vaccinations, Ebola preventive materials/awareness and all our CSR projects. Also, I enjoy seeing how children benefit from the salary received by their parents who work with company.

Have you seen a positive impact since EPO came to Liberia?

The significant increase in the socio-economic levels of the communities within and around the concession is a clear indicator of positive impacts. Locals are more connected by the roads and bridges EPO has constructed and maintained, and the mobile network tower we built in collaboration with the local service provider. There are better health services (clinic & other medical programmes), better education (school & adult literacy), and increased levels of income. Before EPO many had minimal or no income, living only through small-scale slash-and-burn farming. And let's not forget the overall tax received by Liberia on the whole.

What are your hopes for the next few years?

That all stakeholders work together with EPO to ensure further sustainable development of oil palm for our concession areas. Let the success of sustainable oil palm in the regions where we operate be the foundation for Liberia to develop further.

What could the company do better?

I sincerely believe the company has been doing the best it can for all stakeholders. But we will be able to do more once additional areas are developed.



2013-15 LAND ISSUES: PROBLEMS AND RESOLUTIONS

In 2013, a press release was issued by a coalition of international and Liberian NGOs comprising Global Witness¹, Friends of the Earth², FERN³, Save my Future Foundation (SAMFU)⁴, Social Entrepreneurs for Sustainable Development (SesDev)⁵, and Sustainable Development Institute (SDI)⁶.

It was entitled *UK'S Equatorial Palm Oil accused of human rights abuses in Liberia*, and related a number of accusations of EPO "involvement" in the arbitrary arrest and assault of Liberian community members who claim that they were resisting EPO's efforts to take their land, as well as further intimidatory practices. The press release also argued that EPO's expansion plans were contrary to the company's commitments to the RSPO⁷. That release can be found here, archived on the Global Witness website: <https://www.globalwitness.org/archive/EPO/>

The press release made no direct accusations itself, instead reporting that accusations had been made. At the time EPO responded in letters to Global Witness and RSPO that accusations of company involvement in violence were false; that the company did not and does not condone or encourage such behaviour; and that no EPO staff or Liberian Police Officers had ever been instructed or directed to intimidate community members at any time.

1 <https://www.globalwitness.org>

2 <https://www.foe.co.uk/>

3 <http://www.fern.org/>

4 <http://www.samfufoundation.org/>

5 <http://www.forestpeoples.org/partners/social-entrepreneurs-sustainable-development-sesdev>

6 <http://www.sdiliberia.org/>

7 <http://bit.ly/1Nqd232>

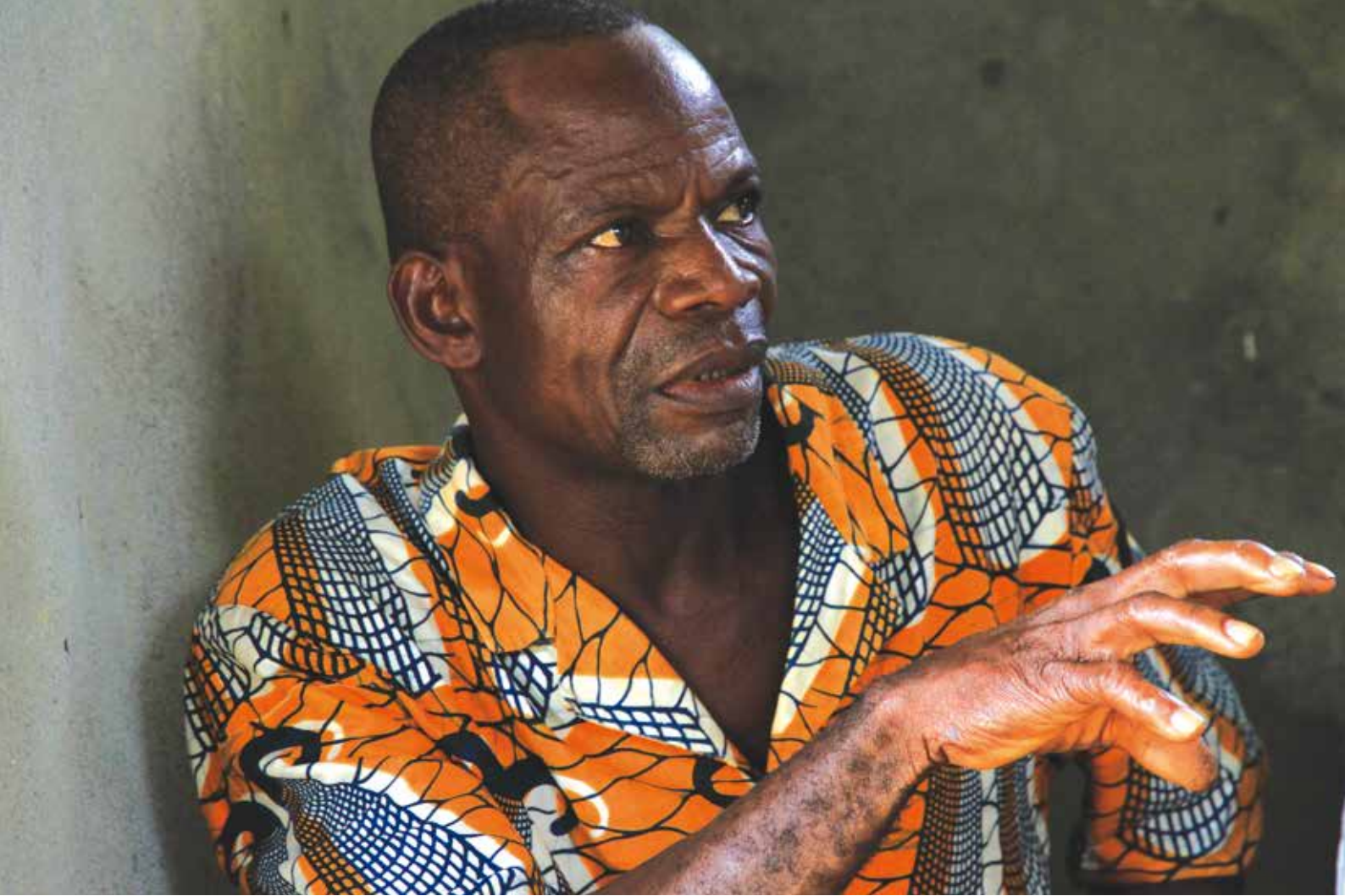


Despite the fact that the accusations were false—and it is notable that the NGOs issuing the press release made no accusations themselves, preferring instead to build a media campaign around events that “appear[ed] to have” happened—this press release focussed a great deal of negative attention on the company. After an internal review, EPO decided that increasing the transparency and clarity of its community relations work and outcomes was a clear priority.

Alleged land malpractice

The release also correctly pointed out that on 18 September 2013, the Sustainable Development Institute (SDI), a Liberian NGO, filed a complaint against EPO with the RSPO alleging that EPO had cleared and planted on community land and was seeking to expand the company’s plantation further without the free, prior and informed consent of those living on the land. The progress of this complaint can be tracked on the RSPO website: <http://www.rspo.org/members/complaints/status-of-complaints/view/44>

EPO responded to RSPO at the time that the company held “a valid concession agreement signed and endorsed by the Government of Liberia,” and that its operations were within the law and RSPO rules. At the time EPO stated that it “respect[ed] the Liberian community rights and land, and [had] followed the law and procedures laid-out and agreed internationally.”



THE JOGBAHN CLAN

It is important to note at this point that the NGOs involved in this campaign, which by and large are expert advocacy organisations, were successful in creating the public impression that the “Jogbahn clan” were against EPO’s development plan^{1,2,3,4}. In reality, however, the portrayal of the “Jogbahn clan” as united against EPO is a misrepresentation. EPO’s Palm Bay estate covers 24 villages or towns on or near the estate that are populated by members of the Jogbahn clan. Of these villages, 17 are currently in favour of EPO’s planned expansion at time of writing; five are against; and two villages are still undecided. It is EPO’s hope that after continued dialogue (see below) and compromise, some or all of the currently dissenting villages will reach an agreement with the company that welcomes further development.

It must be made clear, however, in this report and elsewhere, that where communities decide that they do not want oil palm development, EPO will not develop its estates near those communities, leaving buffer zones in areas agreed amicably with those communities. Furthermore, and contrary to some NGO claims, EPO has not resettled and will never resettle any community against its will.

1 <http://www.foei.org/take-action/actions/landgrabbing-in-liberia-tell-equatorial-palm-oil-no-means-no>
2 <http://wrm.org.uy/all-campaigns/support-the-jogbahn-clan-in-liberia-tell-equatorial-palm-oil-no-means-no/>
3 <http://www.sdiliberia.org/Tell-EPO-NO-Means-NO>
4 <https://www.youtube.com/watch?v=ufMXhc-h9Tg>

“Where communities decide that they do not want oil palm development, EPO will not develop its estates near their communities. “

As of October 2015 the timeline of the complaint as displayed on the RSPO website is as follows:

4 OCTOBER 2013

The company replied to the RSPO saying that it is a valid concession agreement signed and endorsed by the government of Liberia. And the operations are being carried out responsibly within the ambit of the law and the RSPO rules. The investigations into the complaint are on-going.

4 APRIL 2015

In pursuant of bilateral engagement between the parties, Sustainable Development Institute and EPO are meeting the affected communities in Blayah Town.

9 MAY 2015

Agreed action points from the 4 April 2015 meeting: 1) the complainants will establish a selective committee to work with EPO to do the joint verification. They will submit a list of the committee members to SDI for onward submission to EPO; 2) SDI will contact EPO, i.e the community liaison team to arrange the joint verification.

17 MAY 2015

SDI and representatives of EPO conducted the joint verification. There were some overlapping claims in Nnuhn and Qwrakpojilain towns. EPO and SDI have agreed to negotiate on the disputed areas.

14 JUNE 2015

The letter has been sent on the final decision [in favour of EPO] of the [RSPO] complaints panel

RSPO website:

<http://www.rspo.org/members/complaints/status-of-complaints/view/44>

Positive response

After these accusations were made, EPO decided that the most transparent way to handle the complaint lodged with RSPO and surrounding issues in the long term, would be to engage directly with the local NGO that was representing the complainants (SDI). After a meeting in London at the end of 2014 with representatives of SDI, FERN and the Forest People’s Network, ongoing communication with SDI was established and discussions taken forward with a view to resolving communities’ concerns and agreeing a way for the company’s expansion plans to proceed that was agreeable to the households represented by SDI. EPO has now ceded management of this mediation process to SDI, and discussions are ongoing.

THE OUTCOME:

The final decision of RSPO with regard to the complaint filed by SDI, conveyed to EPO in a letter dated 14 June 2015, noted (among other things) the following:

1. That EPO can proceed with the new planting but shall not carry out any land development in disputed areas [...]
2. EPO shall continue the dialogue process with SDI and the communities with the aim of resolving all outstanding issues [...] and boundaries.

What next?

While EPO is pleased that this complaint is resolved, and that more formal and positive communications with SDI and the communities it represents are now in place, this is an ongoing process. While the company believes that large scale agriculture in general and palm oil in particular offers Liberia the best and most sustainable path out of the poverty currently affecting most of its rural citizens, it also acknowledges and accepts that it will not always be welcomed by everybody.

As a corollary of its sustainable nature, the life of a palm oil plantation is a long one, and EPO expects its relationships with local communities to evolve over generations. The company hopes that they will only become more positive, and acknowledges that clear, open communication is fundamental to achieving that outcome.

EPO employs several methods to achieve this, including establishment of a community grievance record book that records major grievances and their status. Liaison officers are always available and open to meet any individuals who wish to speak with the company, whether in the office or in the communities, and EPO's RSPO compliance manager has made a personal commitment to remember everyone by their name.

All of the company's free, prior and informed consent (FPIC) processes at the Palm Bay estate leading up to the reports on planned new planting have been scrutinized and vetted by third party, independent certified assessors before being approved by RSPO. To ensure informed consent, all FPIC processes are conveyed to communities in comprehensible languages by liaison officers fluent in local dialect. In addition, EPO has established relationships with third party observers (currently SDI for the Palm Bay estate) to ensure greater transparency.

Lesson learnt

One of the complaints made by the NGOs that has since been addressed is that EPO was providing logistical support to the police, a practice disliked by some community members. EPO took this criticism on board and discussed it directly with the NGOs, and the practice has remained suspended up until time of writing in October 2015.

It is, however, a fact of doing business in an environment where capacity and infrastructure have been so heavily degraded by war and lack of development that there will be times where EPO will be required to assist the government, particularly at local level. This is already evident in the case of the health clinics, schools and roads opened and maintained by the company (see page 50 and Appendix 2).

EPO CSR microsite

In an effort to increase the transparency of its CSR work and discussions with all local communities, the company has launched a CSR microsite that provides continuous updates on its CSR activity from the field. This can be found at: www.csr21.org/company/equatorial-palm-oil, or via the EPO website at <http://www.epoil.co.uk>.

The microsite showcases the company's CSR work to all stakeholders, increasing transparency around what the company does, with and for whom and with what effect. It provides a source of feedback that serves to drive the company's key performance indicators for CSR. The site is linked from the front page of EPO's corporate website and is also featured on the homepage at CSR21.org, a news and comment site focussed on CSR in the land use industries. The microsite demonstrates EPO's proactivity and consistency in its social engagement, presenting an up-to-date, visible report of its CSR and public/official relationships. It is a line of communication to governments, investors, NGOs, funds, advocacy groups, pressure groups and the public; and an engaging and accessible complement to annual reports and corporate-facing sustainability webpages.

TAX AND ROYALTY REGIME

EPO operates a transparent fiscal policy in relation to local country taxation and royalty regimes. The company operates fully within the Liberian legislative process and its laws.

What follows is a breakdown of the company's expenditure commitments, both in the current situation with all new planting suspended for the assessment of potential HCS areas, and for when production and sales begin.

Key dates

EPO's tax and royalty regime is framed by the following key dates:

- Concession agreement date: August 6, 2008
(when published by the Ministry of Foreign Affairs)
- Rehabilitation term: 7 years from August 6, 2008
- Regular term: 43 years from August 6, 2015

US\$ Costs spent (Oct 2014 - July 2015)				
	Buchanan Office	Palm Bay Estate	Butaw Estate	Grand Total
Capital expenditure	35,365	268,113	98,728	402,206
Operational expenditure	-	2,557,640	1,232,082	3,789,722
CSR	-	193,594	125,858	319,452
Initial expenditure (replanting)	-	3,119,820	1,736,101	4,855,921
Immature upkeep	-	4,447,042	669,459	5,116,501
			Total:	\$14,483,802

Income tax

- 25% of net taxable income
- Loss carried forward period 5 years from the 1st year of taxable income.

Withholding tax regimes

- 10% on any interest paid to non-resident persons and institutions, multi-lateral financial or development institutions, but not commercial banks
- 10% on any dividends distributed shall be withheld
- 10% of payments to non-resident contractors and 6% to resident contractors.

Oil Palm Development Fund

— For long term development of Liberian Palm Oil industry

- Rehabilitation Term: 0.5% of annual gross sales
- Regular Term: 1% of annual gross sales.

Economic Community of West African States (ECOWAS) levy

- 5% for basic raw materials & capital goods
- 10% for intermediate products
- 20% for final consumer products.

Mandatory community development fund

(when producing revenues)

- 1% of annual gross sales

Import duty

EPO is seeking from the government an exemption from import duty until 2020, in order to allow the company to bring equipment into the country for development.

Anti-corruption measures

EPO operates a zero corruption policy across all levels of its business. Ongoing measures include internal education processes on anti-corruption, structures for passing on anonymous alerts, and regular internal reviews of suppliers, financial lines and inventories.

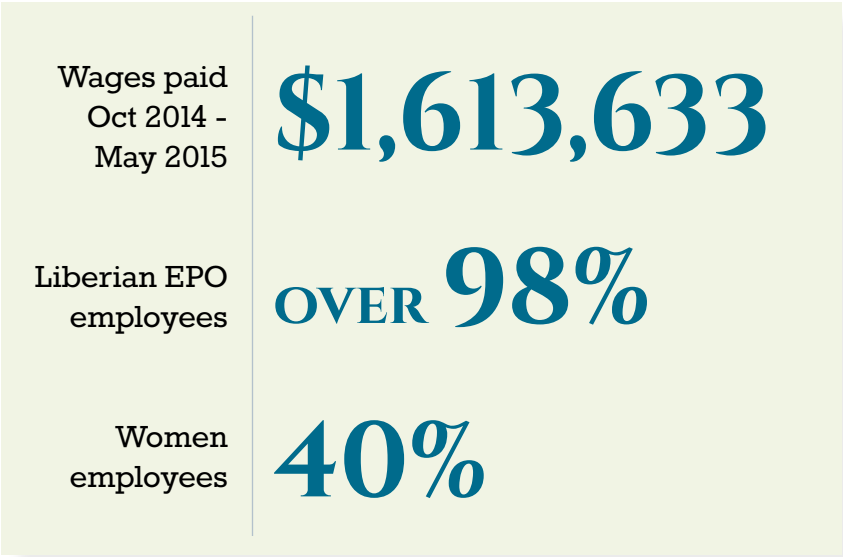


EMPLOYMENT AND TRAINING POLICY

EPO recognises that success for itself, and the wider palm oil industry being established within Liberia, must come from investment in people. While Liberia sits within the correct equatorial zone for oil palm growth and has a history of palm oil production (indeed, the majority of EPO's estates are on the sites of plantations that existed before the war), its civil wars destroyed not just basic infrastructure but a continuity of skills within the domestic labour force.

Over 98% of EPO employees are Liberian, with the majority of the workforce coming from local communities. As a company, EPO has committed to help develop the skills of its employees, working hard to identify and develop its best people.

The company has established a seed nursery cultivation training group, with experts from Indonesia working on site with a special group to head up its nurseries. The nursery, a crucially important element of operations, is now largely overseen and run by the 'graduates' of EPO's training division, with a large percentage of these staff being women. Liberian nationals also work in senior positions across all levels of the company with the exception of the skilled senior planting staff. The inclusion of Liberian employees at this level is a core goal for the next two years.



Between October 2014 and May 2015, EPO paid \$1,613,633 in wages to those working on the estates. This figure is exclusive of wages paid to those running CSR programmes or other expenditure on CSR, EPO clinics, schools or materials.

Employee numbers

Palm Bay Estate



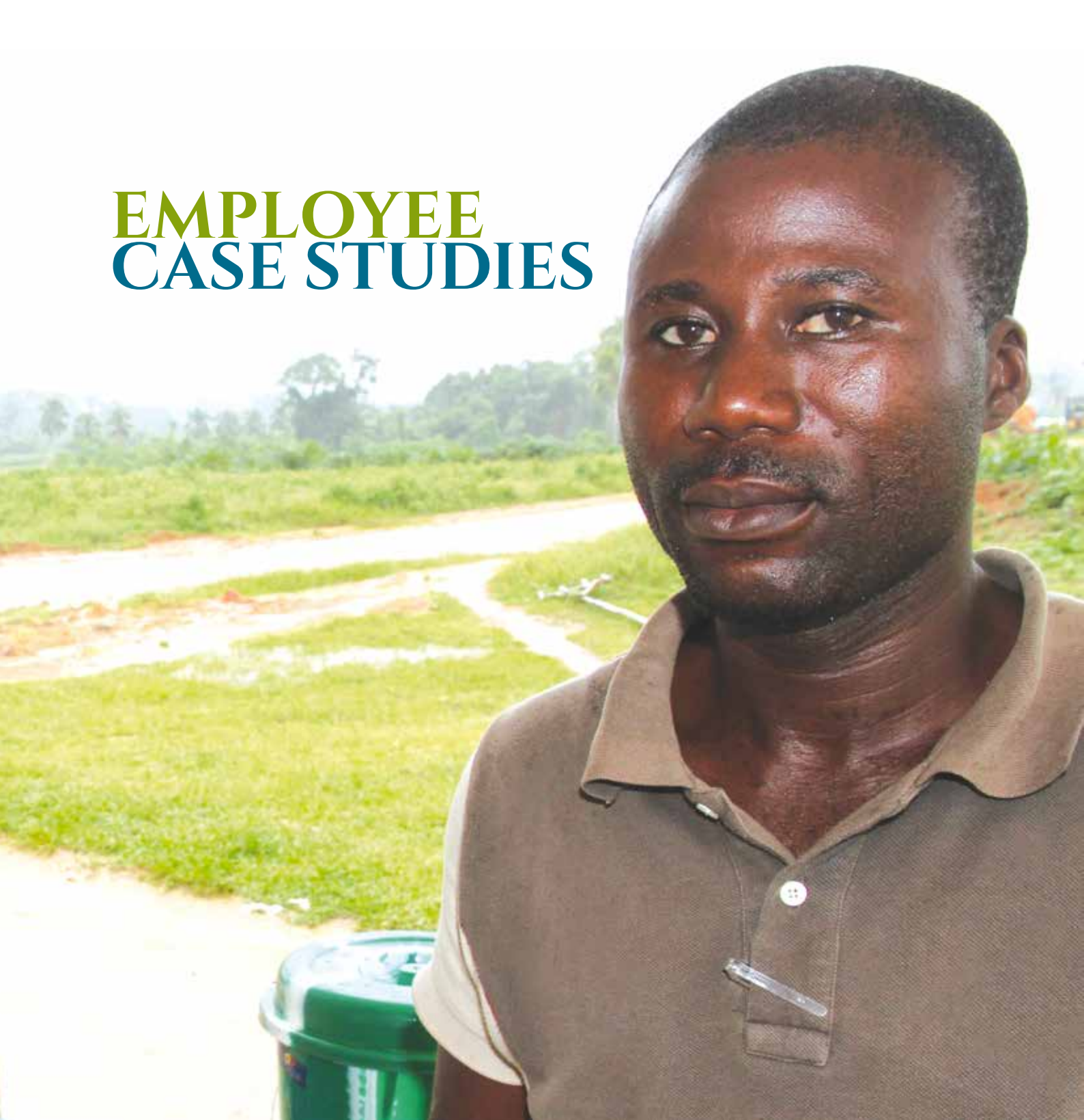
Butaw Estate



EPO's work on community support projects is detailed elsewhere in this report. While the company believes that businesses should engage in corporate citizenship for its own sake, it also needs to assist in the development of areas within local communities in order to secure the long term safety and participation of its core work force.

Poor nutrition and lack of health, water safety, education and infrastructure facilities have been major challenges for EPO since its investment in Liberia began in 2008. The company's objective is to work further with the Liberian government to help develop basic services to local communities. In this way, true synergy can be created between an economically viable series of estates and supportive local communities that benefit from improved living conditions.

EMPLOYEE CASE STUDIES



Baccus M Wiah
RSPO documentation clerk, Butaw estate

What do you do?

I document grievances, carry out PPE [personal protective equipment] assurance, and record the infrastructure projects and the work of the EPO clinics and schools, so we know how the schools are doing. I attend all meetings in our estates, take down grievances, make reports, and take photographs of every CSR initiative.

“even the community residents not working with the company have the opportunity to send their children to the school free of charge. And even our clinic is free of charge, for workers and non workers.”

What are the challenges?

There's a lot of travel out to communities, sometimes in very bad weather. You have to attend other county meetings too, so the company has a presence outside the estates, sometimes I have to convince the workers to put in extra time for the CSR projects — come and build the clinic, expand the school... it's not their job, so they require persuasion sometimes! It also takes time for people in the community to understand how a concession runs. The company always has to be there to clear the view, help people understand how things work and why they work like that.

Have you seen a positive impact since EPO came to Liberia?

Yes. There's a positive impact. Due to the presence of the company here we have 353 workers. That's positive. Because of the company we have a free school running here; all the workers' children attend the school. Even the community residents not working with the company have the opportunity to send their children to the school free of charge. And even our clinic is free of charge, for workers and non workers. We build feeder roads and bridges, creating means for villagers to come to town and bring their crops and other things for sale.

What can the company do better?

In the long run, the company may have to extend health centres to further areas. People come from distance to the centres. Equally, schools will have to be expanded to other areas — now, the company brings children from all over the place to the school, sometimes an hour's drive in the school bus. So we may have to build schools and health centres in areas where we currently have difficulties with transport.



Esthella N Yokolo
Supervisor, Butaw estate

What do you do?

I've been employed in the nursery since 2012. I'm responsible for transplanting seedlings from the small nursery to the main nursery, taking seedlings from there to the main field to be ready for planting, and pruning and cutback of overgrown seedlings.

What are your hopes for the next few years?

For the company to send me for training, so I can really be equipped [to progress]. I want to stay in this company, so I want good training.

Have you seen a positive impact since EPO came to Liberia?

The difference that I have seen is that we used to have a lot of people that weren't working, they weren't doing anything. Since EPO came, at least they're able to sustain themselves. They're working now, they're able to take care of their children, take care of their families. EPO is really helping.

What could the company do better?

If the company were to grow, to expand, more people would benefit.



Sarah Freeman
Supervisor, Butaw estate

Have you seen a positive impact since EPO came to Liberia?

EPO are doing their best. People never had roads; EPO opened roads. It gave them school facilities, a clinic. And they're employing people. EPO are employing people from here [in Greenville] and carrying them there [to the Butaw estate].

What are the challenges?

The land issues—and I don't know the tradition, because I grew up in Monrovia—but there are about five groups in the district... and there is one group bringing up lots of issues about what they want. But we continue to pray that everything will be settled. I think the company should meet the heads of that place to really ask them their problem. What they really want the company to do before they're satisfied.

What could the company do better?

Employees need more training. For me, I know the (oil) palm well now. I know all the symptoms of different problems, (pest) infestations... but I would also like the company to send us for studies so we can take on more. EPO should set us up as supervisors for specific areas. We have the fields from 2012, 2013, 2014; they should divide the supervisors in the field so that we have specific areas to work in.



Dew Ponnie
Chief Driver, Butaw estate

What do you do?

I first worked on this concession in 1978, [before] EPO. Operations are quite different now. Back then, there were no land issues, no regulations, no buffer zones. Back then, you were clearing. Nobody had a right to say no: you did as the government allowed you... there was no RSPO back then!

Have you seen a positive impact since EPO came to Liberia?

Before EPO, people used to walk 10-15 hours down the beach from Butaw to Tasoe. EPO opened a road — now you reach your village in 40 minutes. Before, people used to go into the swamp or the creek for drinking water; now, EPO gave them hand pumps, children are drinking safe water. Children are going to school: free education. Free health. Before, people would walk ten hours to come to the clinic in Greenville. Right now, you stay on the plantation, water is clean, you get your treatment, you go back to your village. Roads, water, education, health.

EPO is a good company. Before, when you go to the market or the store, you pay 25, 30 US dollars for 50kg of rice. But EPO is providing 50kg of [subsidized] rice [to workers] for \$13.50.

“ I have seven children in school; EPO is helping my children go to school, even though they’re not in the plantation, they’re in Greenville - but at month end, I can pay their school fees. All of them are in private school.”

I hope that when things go ahead [and production starts] we’ll get more good benefits from the company. My 82 year old mother is with me, and through EPO my mother is surviving. I have seven children in school; EPO is helping my children go to school, even though they’re not in the plantation, they’re in Greenville — but at month end, I can pay their school fees. All of them are in private school.

What could the company do better?

In my opinion at the moment the company is only investing money... it hasn’t got any income yet. Once the company is producing [palm] oil, it can do more. The business needs to grow. They plan to put a mobile [phone] tower up in the plantation — there is no coverage now. If they can do that, it would make a difference — once they start producing.

What future do you see for your children?

I’m sure they’ll do something better because their report cards impress me. They’re very clever. I’m sure that if I reach my old age they will support me...



Thomas Goshua
Senior accountant, Palm Bay estate

What do you do?

I started in 2011 and rose to be a senior accountant. So far it has been good — EPO has benefited me and my family in a lot of ways; we've moved from one level in our livelihood to the next.

Have you seen a positive impact since EPO came to Liberia?

I think there are a lot of prospects for the growth and development of the locals within this district: EPO has improved our lives to the extent that some of us employees who were living in thatched houses have moved to more secure buildings with strong roofs over our heads. With the growth and expansion of the company I think there will be a lot in store for all of us... that's what I feel. I think it's a good thing for the company to continue its operations here so our lives can be improved for the better. It's not that I'm saying it because I'm an employee. I know what they intend to do, and how the people will benefit from it.

There's been a lot of positive change [already]. There were places with no health facilities, and the company goes there and provides free medical care. They are providing free education to employees and non-employees. They're building hand pumps in villages with no safe drinking water. They're building roads that enable farmers to bring goods to market for sale.

“It will be a good thing if the company stays to help the people of Liberia, so that we won’t be declared an investment unfriendly country, and our lives will be improved and developed significantly.”

What about opportunities for development within the company?

There are a lot of training opportunities, especially for workers in the field. To move from one level to another, you have to be properly trained and orientated. Already we’ve started training would-be harvesters on ablation work; we’ve earmarked a couple of employees we’ll be sending off for additional training. The supervisors in the field, newly promoted head men and field clerks get in house training ... when the operations expand, there will be a lot of opportunity for employees to be developed.

What could the company do better?

They could expand the training — there are more people that want employment and training, contractors that want permanent employment... EPO wants to employ them but we have that on hold because phase two is being held back by land rights discussions. Once these issues are resolved, the company can move forward, compensate farmers for lost crops, then expansion can go forth. As soon as that begins, there will be more employment for locals.

It will be a good thing if the company stays to help the people of Liberia, so that we won’t be declared an investment unfriendly country, and our lives will be improved and developed significantly. There is very great potential for development here.



Robertson Faah
Superintendent, Palm Bay estate

What do you do?

I started work on the mill here in Palm Bay in December 2010, as a fire man. Gradually, based on my performance and my ability to meet the demands of management, I was elevated several stages, until I was a supervisor in the mill, assisting the mill manager. We had about 45 staff at the time, processing fruit bunches. It was fantastic. This was the rehabilitation stage, felling old palm trees. But then we couldn't receive crops into the mill any more, so after running the mill from 2011 to July 2013, we had to close it. And I'm the only one remaining with EPO from those in the mill at the time.

Later, I was asked to serve as a field supervisor in the agricultural sector. I went through the ranks there and proved one of the most promising. I performed well in physical and intellectual work. I was eventually promoted to superintendent.

EPO and Palm Bay offer a promising future for all youth, irrespective of culture and other circumstances, providing you are willing to learn and meet the demands of management. It's up to you. Hopefully, in 2017 there will be a new mill running, and hopefully I will go back. Currently things are OK — we have a friendly environment with the people and with our staff, meeting international standards of practice for labour management,

“wherever I fell short I approached the senior staff and they’ve trained me. It’s up to you, but they are there to help you.”

Does the company’s presence offer opportunities for people who haven’t had the education you had?

Within Grand Bassa district [where Palm Bay Estate is located], EPO is the only company. We’ve built roads, wells, clinics. The clinic serves this entire district and beyond. At this stage, everything can’t be 100 per cent, it’s a gradual process — for example, we’re hoping to extend the school to junior high level... but it’s a process. At the production stage, we can progress all of these projects.

Opportunity is there. But it comes with challenges. Currently the entire world is moving on a technological level... we need to give people technological experience. It’s like the process we have in the field; we teach each other and fill gaps. I’m a superintendent, but I need to impact others so they can replace me; we must all teach each other to build the strength of the company.

EPO is like that. If it hadn’t been so, I couldn’t have had the exposure I had; my mill manager taught me how to run the mill; when I came into the plantation, wherever I fell short I approached the senior staff and they’ve trained me. It’s up to you, but they are there to help you.



CSR & INFRASTRUCTURE

Good oil palm cultivation relies on a skilled workforce. Currently, Liberia is suffering from the after-effects of years of war: eroded capacity, a lack of infrastructure, and a largely unskilled workforce.

To play its part in rebuilding Liberian society, EPO must support the entire area surrounding its estates, as good community partners and for the sake of the business.

To do this EPO focusses on nine key areas:

1. Full effective implementation of the operational and social commitments that RSPO membership entails
2. Practicing the key principle of free, prior and informed consent for all developments
3. Development only in areas that are not primary forest or high conservation value (HCV) areas
4. Participation in the HCS study and agreement to abide by the conditions imposed on signatories
5. Providing direct employment to as many people in local communities as possible
6. Identifying skills, training employees and providing opportunities for advancement
7. Providing, maintaining and running health clinics and services; schools; adult education programmes; housing; safe drinking water; roads; bridges; and other infrastructure
8. As per concession agreements, upon completion of the development of current concessions expansion areas will be made available for outgrowers' schemes. Details of the schemes are being worked out by all stakeholders at time of writing (progress having been slowed by the suspension of concession development pending further assessment of potential HCS areas and ongoing land rights issues). EPO is also already providing technical input for a smallholder tree crop revitalization programme funded by the World Bank
9. Increased transparency on sustainability and CSR, including through a dedicated, frequently-updated microsite: www.csr21.org/company/equatorial-palm-oil

All EPO's community projects are carried out in response to need, as assessed by recording of requests from the community and the work of a full time community liaison team (see page 28).

All EPO's services — clinics and schools — are provided for the whole community, not just for workers or those living on estates. Appendix 2 contains a complete breakdown of all CSR initiatives (Oct 2014 - May 2015), as well as full user figures and user demographics where available.



ENVIRONMENTAL MEASURES

Process for development

On both EPO's estates, boundary surveys — which are the initial step of the free prior informed consent (FPIC) process — have been completed.

The boundary surveys were participatory mapping exercises that were inclusive of all stakeholders. (Participatory mapping is a group-based qualitative research method that gives participants freedom to shape discussion on a given topic with minimal intervention from researchers).

Before development of any new areas, additional HCV and ESHIA (see below) assessments will take place as part of the RSPO's FPIC process. High carbon stock (HCS) assessments, as recommended when the HCS report is finalised, will also be done for all areas prior to any land development.

ESHIA concept

The environmental, social and health impact assessment (ESHIA) process involves monitoring and evaluation of plantation work and plans and their current and potential impacts on the physical and social environments. It provides an integrated assessment of all relevant elements, including but not limited to existing regulatory frameworks, baseline studies, identification of impacts (associated with both ongoing and future phases of the project), implementation arrangements, and mitigation measures. It is used to provide guidelines for EPO to continue sustainable oil palm development with minimal adverse effects on the natural environment and positive impacts on local communities.

EPO's ESHIA assessment was compiled by Coastal Environmental Services (CES)¹ —a South Africa-based environmental management and impact assessment consultancy—in 2012 and 2013 for Palm Bay estate. The scoping report outlined the need for further specialist reports, all of which were completed by early 2013 and the results incorporated into the final ESHIA report.

All reports were then disclosed to Liberian government departments, agencies and affected peoples. Following a 30-day compulsory public disclosure period, no submissions, written or otherwise, were received from any party on the environmental reports. During the latter process the ESHIA report was disclosed to the communities on 10 May 2013 in Compound 4, Grand Bassa District 4 Headquarters; to the Environmental Protection Agency of Liberia (EPA) in Monrovia on 3 May 2013; and in Buchanan on 4 May with Environmental Officer Mr Richard Wheaton and Environmental Inspector Mr Nathaniel Kollie. No response, comments, issues or grievances related to the process were received then or since.

The current report therefore provides the final project plans, as well as each specialist study's impact ratings, mitigation measures and recommendations.

CES is led by Dr Ted Avis, whose summary of the ESHIA is as follows:

1 <http://www.cesnet.co.za>

“On 5 May 2013 CES released a draft Environmental Social and Health Impact Assessment completed to international standards, covering... Palm Bay Estate and expansion areas, for public disclosure. The ESHIA investigated a wide range of environmental and social impacts, and developed an Environmental and Social Management System to mitigate these impacts. With mitigation, there will be no negative impacts of very high or high significance, except for a number of benefits which result in positive impacts of high significance. As all negative impacts are of moderate to low significance, the ESHIA concluded that the development is acceptable from an environmental and social perspective, and will result in sustainable benefits in the area.”

HCV CONCEPT



HCV concept

To meet the standards required for RSPO certification, growers must integrate the High Conservation Value (HCV) concept and associated tools into their management practices and conservation approaches. The HCV concept is a cornerstone of the RSPO standard for certified sustainable palm oil, which requires that areas that contain HCVs are identified and appropriate measures are taken to manage and maintain them. Appropriate management includes ensuring legal requirements relating to the protection of species and critical habitats are met; damage to and deterioration of HCV habitats is avoided; any illegal or inappropriate hunting, fishing or collecting activities are controlled; and responsible measures to resolve any human/wildlife conflicts are taken. The concept was originally developed for the forestry industry but provides a useful basis for oil palm growers to prioritise conservation in and around their plantations¹.

EPO's HCV Assessment was compiled by Green Consultancy Inc² for the Palm Bay estate phase 1 development area.

¹ See more at: <http://bit.ly/1S9tGEH>

² <http://www.gcilimited.co.uk/>

NEW PLANTING PROCEDURE (NPP)



New planting procedure (NPP)

All EPO's new oil palm plantings must be in accordance with the RSPO new plantings procedures (NPP) (<http://www.rspo.org/certification/new-planting-procedures>).

The key steps are as follows:

- 1. Conduct impact assessment (HCV assessment must be conducted through licensed HCV assessors)**
- 2. Prepare implementation plan**
- 3. Verification by certification body**
- 4. Public notification on the RSPO website for at least 30 days**
- 5. If no comments are received, proceed with new plantings**
- 6. If comments are made, the company has to address these comments until satisfactory resolution. Only then may the company proceed with new proposed development. If not, the comment will be escalated to the RSPO Complaints Panel.**

GENDER EQUALITY AND EMPOWERMENT

The United Nations Development programme¹; UN Women² ; USAID³; the UK Department for International Development⁴ — there is no shortage of sources of evidence for women’s crucial role in sustainable development.

Gender equality is not only a basic human right, but its achievement has enormous socio-economic ramifications. Empowering women fuels thriving economies, spurring productivity and growth⁵. The impact of gender equality — including the greater employment of women — can be particularly profound in developing economies like Liberia’s, where gender equality, economic development and environmental stability go hand-in-hand⁶.

What is less often said, though some industry reports are beginning to touch on this⁷, is that greater involvement of women in certain industries is also of central importance to the business case. This is true at strategic level—as Lord Davies of Abersoch memorably put it in a report on gender balance in the mining industry, “better balanced boards bring real business benefits”⁸ — but also down through executive levels to the workforce generally.

EPO is proud to state that around 40% of its total workforce is female. Modern large scale oil palm production has probably created the first point in the country’s agricultural history at which females can work in equality alongside males; without companies such as EPO, women would not be afforded opportunities to work in the formal agricultural sector.

Women can be found throughout EPO’s workforce, from the oil palm nurseries to the plantation to the clinics and outreach roles, and EPO is proud to be a company that creates opportunities for women at all levels of the business. Since work began in 2008 evidence suggests that the female workforce is more effective at certain tasks on the plantation when compared to the males, including in the nursery and planting out of the palms, but EPO is pleased that several local women employed in the company have also moved into office and administrative roles. The company hopes — and works to ensure — that this trend continues.



1 <http://www.undp.org/content/undp/en/home/ourwork/womenempowerment/overview.html>

2 <http://www.unwomen.org/en/news/stories/2014/10/world-survey-2014-press-release>

3 <http://www.usaid.gov/what-we-do/gender-equality-and-womens-empowerment>

4 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67582/strategic-vision-girls-women.pdf

5 <http://www.unwomen.org/en/about-us/about-un-women#sthash.48qk7ZdE.dpuf>

6 <http://www.undp.org/content/undp/en/home/librarypage/womens-empowerment/powerful-synergies/>

7 <https://www.womeninmining.org.uk/mining-for-talent-a-study-of-women-on-boards-in-the-mining-industry/>

8 Ibid.



Gender equality outside the workforce

At grassroots level, EPO takes pains to ensure that the education provided by the company is open to all. The uptake of EPO adult literacy programmes by women of all ages is high and growing. At school level, across both the company's schools, there are still slightly more boys than girls, though the gap is small enough to be attributable to demographics and the gender breakdown varies widely by grade. On the Palm Bay estate, schoolboys outnumber girls 292 to 221; at Butaw there are 197 girls to 195 boys. See Annex 2 for full details.

Finally, EPO was also proud to contribute the funds for the building of a covered women's market in the city of Buchanan (24kms from Palm Bay estate) that provided over 100 stalls for the trading of local goods and produce.



2013-15 WEST AFRICAN EBOLA OUTBREAK

The Ebola outbreak that began in West Africa in December 2013 rallied an unprecedented response by the international community and by individual governments, who brought in military expertise, medical teams, critical equipment and supplies, and considerable financial resources¹.

Liberia was among the worst affected countries: when Ebola hit, in March 2014, the healthcare system was under-financed and poorly equipped. Liberia had only 130 doctors for a country of 4.5 million people. Many of those doctors died of the disease, and the domestic health system, already weakened by the legacy of civil war and a lack of infrastructure, was unable to cope². The resultant capacity vacuum was partially filled by those companies and other private organisations that responded quickest and most effectively to the epidemic.

In this context, EPO realised that its duty to its staff and host communities was best met by working proactively with local and national authorities to help support the national response to the epidemic, providing workers and local communities with assurance that a structured health response was in place. The company made a point of asking its small group of expatriate employees — none of whom had requested to leave — to remain on site during the crisis to assist their Liberian colleagues through this critical period. Though many other private companies and NGOs evacuated their international staff, EPO is proud to say that all of its expatriate employees agreed to remain on site throughout the epidemic.

With clinics already built at the EPO estates as part of pre-existing CSR commitments, the company initiated health outreach programmes into local villages to ensure that all community members in the vicinity of EPO estates fully understood the procedures necessary to prevent infection. Following international guidance from WHO and others, EPO clinic staff were asked to focus primarily on education relating to sanitation and hand-washing measures to prevent infection in communities without access to running water. As a crucial

1 <http://www.who.int/dg/speeches/2015/ebola-briefing-security-concil/en/>

2 <http://www.afro.who.int/en/liberia/who-country-office-liberia.html>



part of the region's health infrastructure, EPO always has open communication with local and national health authorities; this was invaluable in sharing information on outbreaks and resources.

A number of preventative and precautionary measures were introduced at all EPO sites in accordance with government guidelines. Numerous hand sterilisation points were set up, and "thermo flash" thermometers were provided, allowing staff to monitor the body temperature of workers and visitors without physical contact and risk of contamination. These thermometers make 'no touch' readings of individuals' temperatures without the need for sanitation or disposal following use. EPO clinics were equipped with isolation gowns, gloves and face masks for use in screening patients. Restrictions were also imposed on non-essential domestic travel for employees.

As well as continuing to staff, supply and operate the company's clinics as usual throughout the epidemic, EPO also provided extra supplies and equipment in response to the specific needs created by Ebola. Following a request by the Liberian Caucus of Senators for materiel, EPO donated \$10,000 worth of medical equipment to the County Task Force in Grand Bassa. At the same time, the company took the decision to make further equivalent donations to the County



Task Forces of River Cess and Sinoe counties. Donated equipment included isolation and protective gear for health workers, key sanitation supplies, and a large consignment of thermo flash thermometers. EPO's own clinics were also fully equipped with isolation equipment in case of infection events.

As part of an intervention arranged by the Malaysian government, EPO's joint venture partner KLK donated USD\$110,000 for the purchase of rubber gloves, essential items in Ebola prevention and treatment.

Finally, EPO has joined the Ebola Private Sector Mobilisation Group (EPSMG), a body comprising over 70 companies and 40 public bodies/NGOs with operations in or near Ebola-affected countries. Like EPO, these companies have all made long-term commitments to the countries in which they operate and the people of those countries, and intend to honour these commitments.

Despite the challenging environment, at time of writing EPO is continuing with normal operations, with the health and safety of our employees remaining an absolute priority at all times. As a result, there have been no Ebola cases on either of EPO's estates.

SUMMARY OCTOBER 2015

As one of the first companies to commit to Liberia since the end of the civil wars, Equatorial Palm Oil has worked since 2008 to bring new investment and industry into an emerging, post war economy. Working within a newly established democratic system and amongst local communities that have had little contact with cross-border private sector companies, the company has tried to build commercial operations in a socially responsible manner. In this time, and having learnt from some mistakes, EPO has evolved its corporate and social responsibility approach, with its core philosophy based on the following tenets:

1. Open engagement and formalised contact (recording of all requests and complaints)
2. Open engagement with all stakeholders — including but not limited to communities, federal & regional governments, civil service bodies and NGO groups
3. Established community programmes built on feedback from the populace and focussing on: necessary infrastructure, health, education for children and adults, sanitation, and nutrition
4. A commitment to the employee skills development and training
5. Equal opportunities in employment and social programmes, ensuring positions and benefits are open to all stakeholder communities
5. A zero-corruption policy, backed up with training and proactive policy towards individual issues
6. Commitment to follow Liberian national laws and policies.

Ebola in 2014-15

EPO worked proactively with local and national authorities throughout the Ebola epidemic to help support the national response, providing workers, local communities and local health professionals with training, assistance, equipment and facilities to ensure a structured health response. All of the company's expatriate staff stayed on site throughout the crisis to assist their Liberian colleagues and together they saw out the epidemic with minimal direct impact on any of EPO's host communities.

HCS Study

An international study is currently ongoing to define clearly what constitutes high carbon stock (HCS) forest, and establish HCS thresholds for new oil palm cultivation. It is planned that the study's findings will be integrated into existing processes and standards, such as the RSPO's Principles and Criteria, and it is expected that they will go a long way to shaping EPO's long term planting strategies in Liberia. When the study is published, EPO will be able, within the limits it will establish, to recommence planting on its Liberian estates, with consequent effects on the company's ability to provide employment to greater numbers of people and the potential expansion of its CSR projects.

Land issues

Currently engaging directly with certain communities to the east of current operations at the Palm Bay estate and the Liberian NGO representing them (SDI), EPO has taken the opportunity to establish a formal process to explore and record grievances within these few communities and has submitted the subsequent findings to all stakeholders. The parallel RSPO complaints process has been resolved and a decision has been taken that allows new planting, though this is at present suspended due to the ongoing assessment of potential HCS areas.

EPO is now seeking to progress this community engagement process to formal talks with key community leaders, as agreed during the engagement period that took place in Q2 2015, with the aim of dispelling key misunderstandings and engaging directly on issues of contention. It is EPO's intention to open these talks to a representative sample of all stakeholders who are concerned by this issue. A list of community representatives has already been provided by SDI; additional representatives and participants will of course be selected by communities and other stakeholders themselves, with EPO an equal participant in the process.

Outlook

EPO is committed to building an ethical, socially responsible, economically viable palm oil business within Liberia. At present no meaningful production or revenues have commenced, but in order to ensure that a sustainable business is established, EPO has worked to address environmental and social factors that overlap its operations, and build a deep and strong foundation in the communities within and with which it works. An important priority for EPO is to have clear parameters established for future land use so further investment can be made to deliver full scale production within Liberia, building a strong business by working closely with local communities and the Liberian government. EPO has clear commitments as per its fiscal obligations when production begins; and following first sales, will expand its social commitments.

APPENDIX 1: EPO SUSTAINABILITY POLICY STATEMENTS

This Policy Statement applies to EPO and all of its subsidiaries.

The company will encourage the application of this Policy amongst our business partners including contractors, suppliers, trading and JV partners.

The company is committed to ensuring that its products are produced in a sustainable manner. This is realised through continuous balanced assessment and development of its operations while simultaneously conserving and improving the natural environment, and uplifting the socio-economic conditions of its employees and local communities. These important aspects are incorporated not only in its daily operations but also in its decision making processes.

The company adopts the Principles & Criteria (“P&C”) set out by the Roundtable on Sustainable Palm Oil (“RSPO”) as the foundation of its sustainability practices, and is further guided by the following policies:-

1. No deforestation

- There will be no development of areas classified as high carbon stock (“HCS”) forests defined by the interpretation of HCS issued by the industry-led working group (“HCS Study”). The HCS Study will, when completed, provide reliable information on greenhouse gas emissions (“GHG”) and socio-economic considerations to guide decisions on land conversion to oil palm plantations.
- In the interim and until the results of the HCS Study are adopted, EPO has halted all development on potential HCS areas, effective from September 2014.
- We will fully adopt the RSPO Criterion 7.8 to minimise GHG emissions from new developments. The emission of GHG will be progressively reduced on existing plantations and operations. We will adhere to RSPO or equivalent certification standards and all relevant national legislation.
- The company pledges to conserve biodiversity by identifying, protecting and maintaining high conservation value areas.
- A strict Zero Burning policy is practised in relation to all new planting, re-planting or other development.

¹ EPO will engage independent third parties and employ the HCS Approach methodology, to identify potential HCS areas before any new development

2. Protection of peat areas

- There will be no new development on peat areas, regardless of depth.
- We are committed to applying Best Management Practices on existing peat lands in our plantations.
- In areas that are found to be unsuitable for replanting, we will work with experts to explore options including environmentally friendly alternative uses or peat restoration.

3. Drive positive socio-economic impact for people and communities

- The company respects, supports and upholds fundamental human rights, and does not engage in discrimination based on race, religion or gender. Reproductive rights in line with the country's laws shall also be respected.
- We place great importance on the individual cultures, customs and languages in the countries/regions where we operate.

3.1 Respect and support the Universal Declaration of Human Rights

The company recognises the inherent dignity of the individual and supports the Universal Declaration of Human Rights by the United Nations.

3.2 Respect and recognise the rights of all employees

The company is committed to ensuring that the rights of all employees, including contract, temporary and migrant workers, are respected according to local, national and ratified international laws and that international best practices are adopted where legal frameworks are not yet in place. It is our priority to comply with relevant legislative objectives and moral obligations to create, build and promote a harmonious, safe and healthy work environment and culture.

The following principles are core elements that will guide EPO Group's operations.

(i) No forced or bonded labour

The Group and its suppliers/contractors shall not knowingly employ or support the use of forced or bonded labour or human trafficking and shall take appropriate measures to prevent the use of such labour in connection with the Group's operations. There will also not be any restrictions on the workers' freedom of movement during their free time. The Group shall not deduct any part of an employee's wages unless provided for by law, nor withhold any property, identification cards, passports or other travel documents without their prior consent.

(ii) No child labour

The Group and its suppliers/contractors shall not knowingly employ or support the use of child labour. Remedial actions with appropriate follow up actions shall be employed if any child labour case is uncovered to protect the welfare of the child.

(iii) Occupational safety and health

The Group and its suppliers/contractors shall strive to provide a safe and healthy workplace environment and take effective steps to protect employees from exposure to potential occupational safety and health hazards that are likely to pose an immediate risk of permanent injury, illness or death.

(iv) Employment contracts

The Group and its suppliers/contractors shall ensure that employees are given in writing, in a language that they understand, a description of their duties, rate of pay, working hours, leave, and any other benefits of employment.

(v) Freedom of association and right to collective bargaining

The Group and its suppliers/contractors shall recognise and respect the right of employees to form and join trade unions of their choice subject to the provisions of relevant national legislation.

(vi) Minimum income standard

The Group and its suppliers/contractors shall ensure all workers are paid a wage equal to or exceeding the legal minimum wage and are covered for work-related illness and injuries.

(vii) Working hours

The Group and its suppliers/contractors shall ensure that working hours comply with national legislation including overtime hours (which are on a voluntary basis), and that workers have at least one rest day each week.

(viii) Record keeping

The Group and its suppliers/contractors shall maintain records of working hours and wages for all workers.

(ix) Equal employment opportunities

The Group and its suppliers/contractors shall ensure equal opportunities in the work place. All decisions relating to hiring, remuneration, access to training, promotion, termination or retirement will be made based on business needs, job requirements and individual qualifications and without regard to race, religion or gender.

(x) Access to education

The company is committed to ensuring that children of employees who are living in its plantations are provided access to education.

(xi) Harassment and violence

The Group and its suppliers/contractors shall not tolerate any type of harassment or violence.

(xii) Whistle-blowing

The Group shall provide a confidential means for all personnel to report illicit (i.e. unethical or illegal) activities. The Group shall refrain from disciplining, dismissing, or discriminating against any personnel for providing information on such activities.

(xiii) Business integrity

The Group shall conduct business in an honest and ethical manner, and comply with applicable laws and regulations.

(xiv) Grievance redress procedure

The Group shall provide a means for all personnel to air their grievances regarding their employment conditions, responsibilities, co-worker issues, promotion opportunities and other issues related to the work environment.

3.3 Facilitate the inclusion of smallholders into the supply chain

The company will strive to conduct continuous consultations with smallholders, and together with other stakeholders, provide technical assistance and support to smallholders to help them achieve compliance with this policy.

3.4 Respect land tenure rights

The company will respect legal land tenure rights, and recognise duties and responsibilities associated with tenure rights, such as respect for the long-term protection and sustainable use of land and national resources. This is done in compliance with the national obligations, constitutions, local laws and regulations of the countries where we are operating.

3.5 Respect the rights of indigenous and local communities

The company respects, upholds and recognises the rights of indigenous and local communities, to give or withhold their free, prior and informed consent (“FPIC”) to operations on lands to which they hold legal, communal or customary rights.

The company is committed to ensuring compliance by way of FPIC prior to commencing any new operations. The company will engage relevant stakeholders when undertaking such FPIC processes to ensure that such processes are properly implemented.

3.6 Resolve verifiable complaints and conflicts through an open, transparent and consultative process

The company is committed to actively and constructively engage with all stakeholders, including communities, governments, suppliers and civil society. In this respect the company has developed processes for the responsible handling of all complaints therefrom in consultation with such stakeholders.

TRACEABILITY

The company will endeavour to put in place a traceable palm oil supply chain. All the palm products produced by own plantations are traceable up to our respective palm oil mills, refineries and kernel crushing plants.

While it remains a challenge to fully trace the sources of FFB supplied by all traders/dealers, the company will continue to engage with all third party traders/dealers to further improve and enhance our traceability mechanism.

IMPLEMENTATION TIMELINE

The company will, together with the relevant stakeholders, develop a time-bound action plan to implement the commitments in this Policy. The company expects its suppliers and contractors to fully comply with the commitments herein by 31 December 2016.

REPORTING

The company will provide a half-yearly update on the time-bound plans and the progress of the implementation of the Policy commitments.

CONTINUOUS STAKEHOLDER ENGAGEMENT

The company acknowledges that the implementation of this Policy and its effectiveness would require the support and co-operation of its supply chain partners. We will work and engage with our partners and all relevant stakeholders to meet the objectives of the listed commitments. We value constructive inputs and suggestions to further enhance the implementation of the commitments.

COMPLIANCE WITH POLICY

The company takes the commitments in this Policy seriously and will continuously engage with its suppliers, contractors or trading partners to ensure compliance. In cases of chronic non-compliance or serious violations, the company will take appropriate action including their removal from the Group's supply chain.

This sustainability policy has been adopted from KLK

APPENDIX 2:

COMPLETE BREAKDOWN OF EPO CSR INITIATIVES, OCT 2014 - MAY 2015

What follows is a breakdown of expenditure on labour, education and clinic costs, and CSR Projects completed for both Palm Bay and Butaw estates between October 2014 and May 2015.

Data for that period is illustrative and further similar CSR works have been and will remain ongoing since May 2015.

LABOUR FIGURES

Employee numbers

Palm Bay Estate



1058

Butaw Estate



353

Local wages detail (Palm Bay, Oct 2014 – May 2015)

	Circle weeding	Slashing	Manuring	Ablation	P&D	Supplying	Planting	Total
2011 fields	59,027	61,490	22,337	16,503	15,904	63,808		239,069
2012 fields	38,180	55,337	12,056	16,186		28,129		149,888
2013 fields	48,855	61,988	9,422	7,622	2,277	10,294		140,458
2014 fields	78,690	100,658	23,750	4,738	1,037	5,057		213,930
2015 fields	572		972				7,765	9,309
Nursery								37,528
Workshop								30,144
Security								81,440
Genset								9,785
Office staff								98,616
Drivers								55,516
Others								84,069

G. Total (\$) 1,149,752

Local wages detail (Butaw, Oct 2014 – May 2015)

	Circle weeding	Manuring	Ablation	P&D	Planting	Total
2012 fields	29,255	4,223	1,113	8,224		42,815
2013 fields	36,920	10,404	5,381	1,758		54,463
2014 fields	17,614	4,236		3,589		25,439
2015 fields					1,927	1,927
Nursery						28,864
Workshop						36,646
Security						45,188
Genset						8,229
Office staff						76,863
Drivers						68,000
Others						75,447

G. Total (\$) 463,881



SCHOOLS



Butaw Estate



Palm Bay Estate

Butaw Student detail			
	Male	Female	Total
K-A	48	22	70
K-1	39	37	76
K-2	31	31	62
Grade 1	42	41	83
Grade 2	36	35	71
Grade 3	35	24	59
Grade 4	26	19	45
Grade 5	25	8	33
Grade 6	10	4	14
Total:	292	221	513

Palm Bay Student detail			
	Male	Female	Total
K-A	31	38	69
K-1	32	26	58
K-2	22	28	50
Grade 1	29	34	63
Grade 2	25	17	42
Grade 3	17	19	36
Grade 4	16	16	32
Grade 5	11	10	21
Grade 6	12	9	21
Total:	195	197	392

School personnel details

Butaw Estate	
	No. of individuals
Principal	1
Vice principal	0
Registrar	1
Teachers	9
Support staff	2
Adult literacy facilitators	0
Total:	13

Palm Bay Estate	
	No. of individuals
Principal	1
Vice principal	1
Registrar	1
Teachers	9
Support staff	7
Adult literacy facilitators	9
Total:	28

School expenditure details

Butaw Expenditure (Oct 2014 - May 2015)	
	Amount
Staff salaries	19,099
Vehicle running	2,608
Others	2,850
Total:	\$24,557

Palm Bay Expenditure (Oct 2014 - May 2015)	
	Amount
Staff salaries	24,624
Vehicle running	15,252
Others	14,854
Total:	\$54,730

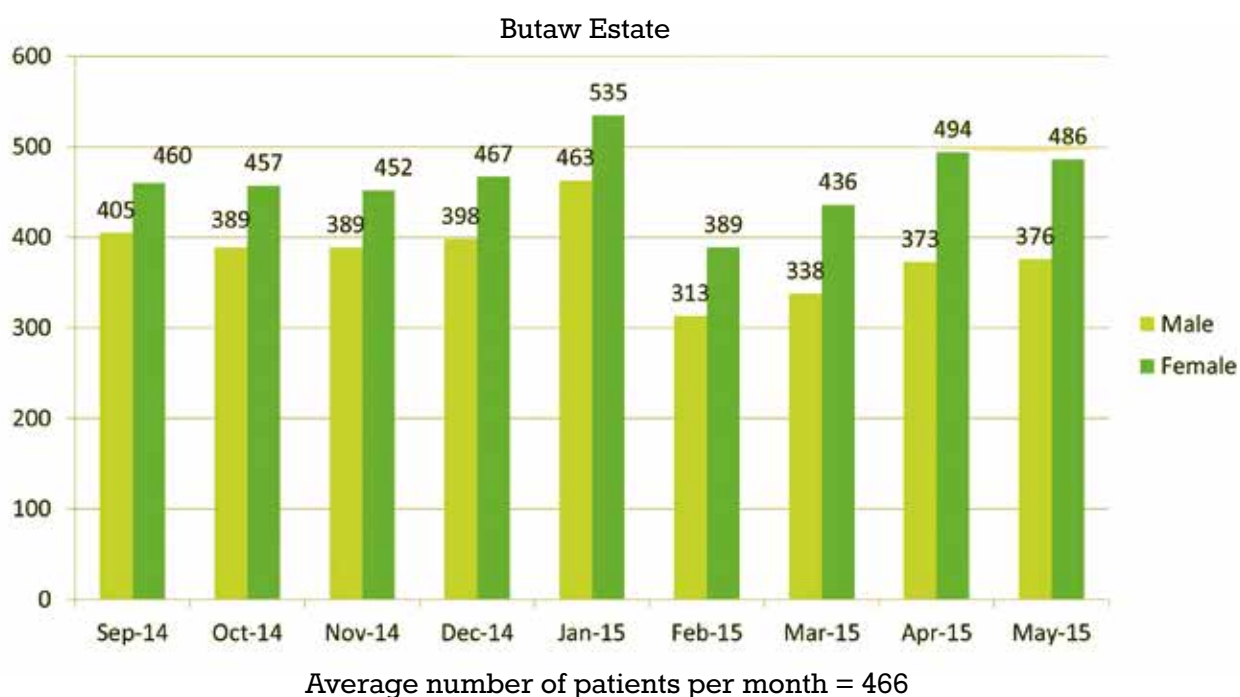
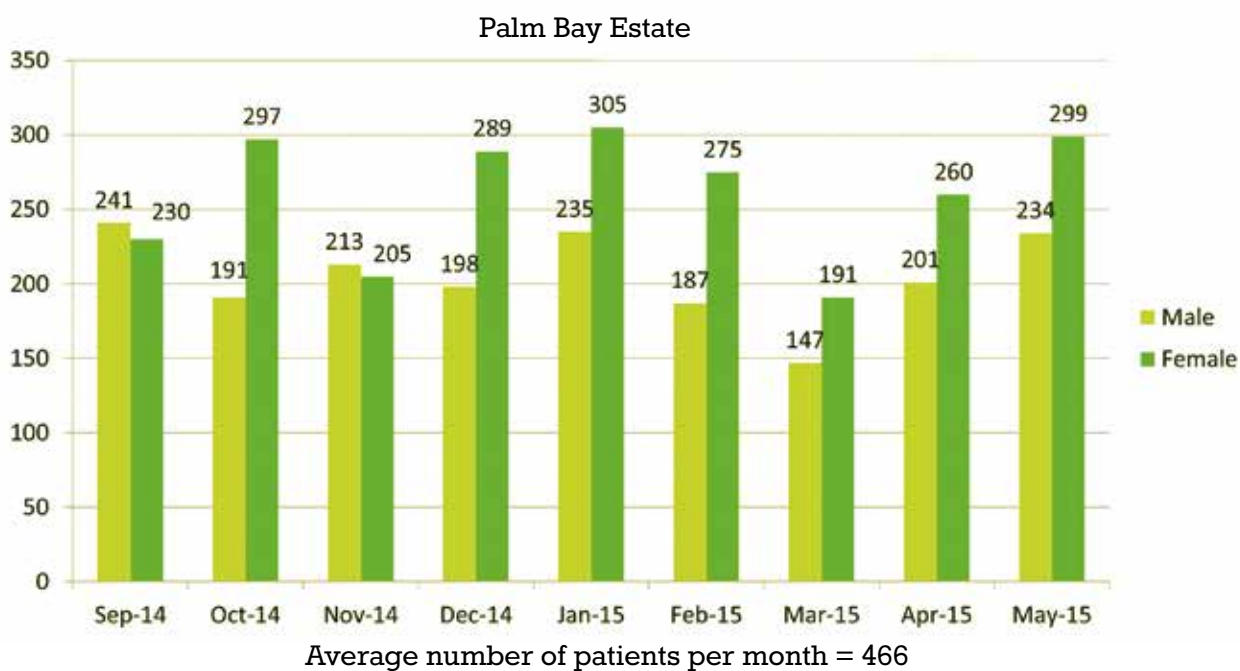
CLINICS



Butaw Estate



Palm Bay Estate



Treatment for Non employees/villagers

Butaw Estate		
Month	Total	% Treated
Sep-14	359	22%
Oct-14	384	37%
Nov-14	383	31%
Dec-14	535	41%
Jan-15	435	35%
Feb-15	242	24%
Mar-15	262	19%
Apr-15	282	8%
May-15	282	4%
Total:	3,164	41.5%

Palm Bay Estate		
Month	Total	% Treated
Sep-14	112	22%
Oct-14	107	37%
Nov-14	143	31%
Dec-14	168	41%
Jan-15	184	35%
Feb-15	159	24%
Mar-15	123	19%
Apr-15	136	8%
May-15	148	4%
Total:	1,280	30.5%

Clinic personnel details

Butaw Estate	
	No. of individuals
Officer in Charge	1
Midwives	1
Traditional midwives	1
Registrar	1
Dispenser	1
Nurses	1
Nurse aid	1
Dressers	0
Vaccinator	1
Cleaner	1
Total:	9

Palm Bay Estate	
	No. of individuals
Officer in Charge	1
Midwives	2
Traditional midwives	1
Registrar	1
Dispenser	1
Nurses	2
Nurse aid	3
Dressers	2
Vaccinator	1
Cleaner	1
Total:	15

Clinic expenditure details

Butaw Expenditure (Oct 2014 - May 2015)	
	Amount
Staff salaries	30,661
Transport/vehicle	14,886
Medicines	6,544
Sick pay	14,540
Total:	\$66,631

Palm Bay Expenditure (Oct 2014 - May 2015)	
	Amount
Staff salaries	55,574
Transport/vehicle	13,891
Medicines	12,117
Sick pay	6,941
Total:	\$88,523

CSR PROJECTS COMPLETED

OCT 2014 — MAY 2015

LFPI

Month	Description	Details
Mar-14	i. Road grading Komanah Town ii. Road grading Baffu Bay	7.0 km 15.0.km
Apr-14	i. 3 log bridges for Tarsue Community ii. 2 new hand pumps	New & shorter access to Grenville Signboard Village & Fofana Hill
May-14	i. 2 new hand pumps ii. Rehabilitation of old hand pump	Komanah Town & Baffu Camp Komanah Town
Jun-14	i. Football match ii. New magistrate building	For senior staff/employees To replace old run down structure
Jul-14	i. Rehabilitation of old hand pump ii. Community school contributions iii. Kickball match (women's game) iv. Ebola prevention campaign	Field 3 Zinc sheets and wooden benches Expressing gender equality within plantation
Aug-14	Ebola prevention campaign	Campaign intensifies with more training
Sept-14	i. Contribution to police & immigration post	Zinc sheets
Oct-14	i. Ebola preventive material contributions ii. Ebola task force iii. Bridge repair	15 villages within & near the concession Initiative to curb spread of Ebola Main road serving as lifeline to Sinoe County
Nov-14	i. Ebola Task Force training ii. Contribution to Ebola survivor	Collaboration with Ministry of Health Cash & clothing
Jan-15	i. Survey thanksgiving programme ii. Ebola preventive material contributions iii. Contribution to Ebola survivor (child)	Games, food & gratitude speeches Communities within & near concession Clothing
Feb-15	i. Road grading works through Komanah ii. Rehabilitation of old hand pump	6.0 km St. Pe Community
Mar-15	i. Hand pump repair ii. Rehabilitation of old wooden bridge iii. Pit latrines	Fofana Hill & Field 3 Road towards Komanah Town 4 units Fofana Hill
Apr-15	i. Pit latrines ii. Hand pump repair iii. Reconstruction of old wooden bridge	Baffu Camp Baffu Camp Road towards Karpu Town

LIBINCO

Month	Description	Details
Feb-14	i. Road towards Debbah Town ii. New Latrines	2.5 km Palm Bay School
Mar-14	i. Road grading towards Gbahs Town ii. Road grading towards Kampala Town iii. 3 new hand pumps iv. 2 hand pumps rehabilitated v. Community school contributions vi. Mobile clinic initiated	8.0 km 1.0 km Debbah, Willesama & Gbanee Town Neyor Camp Benches, chalks & duster (Debbah Town) Twice a week (Debbah & Bourbor Town)
Apr-14	i. New hand pump ii. Adult literacy teachers training course	Kampala Town Training for the teachers
May-14	Friendly football match for staff	Held in LAC plantation
Jun-14	i. Adult literacy classes initiated ii. Community bridge repairs	2nd batch. Open for all Tarloe Town
Jul-14	Ebola prevention campaign	Within plantation
Aug-14	Ebola prevention campaign	Campaign intensifies with more training
Sept-14	i. Ebola training for medical staff ii. Ebola preventive material contributions	Collaboration with Ministry of Health. All clinics within District 4, Grand Bassa
Oct-14	i. Weekly Ebola prevention training ii. Ebola related burial training iii. Road repairs for bad patch	For communities around concession Collaboration with Ministry of Health Buchanan-Rivercess road
Nov-14	Ebola preventive material contributions	Communities within & near concession
Dec-14	Ebola preventive material contributions	Communities within & near concession
Jan-15	Xmas & community contributions	Rice & materials for communities
Feb-15	i. Replacement of hand pump ii. Measles immunization campaign iii. Clinic renovation iv. Security training	School hand pump stolen For all Porch construction For PPD
Mar-15	i. School extension for additional classrooms ii. Hand pump repair iii. Road grading works	To cater for more students Debbah & Kampala Town 3km towards Nohn Town
Apr-15	i. Road grading works ii. Grading of football field iii. New hand pumps iv. Earth leveling works	4km towards Blayah Town For Blayah & Sammy Town Yeaway, Robert Town & Gbapeweyeh Compound 4 community school & market site