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I. PURPOSE AND SCOPE OF APPLICATION

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

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

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

- Present the main steps to follow in the land acquisition process in accordance with general FPIC requirements and local realities,
- List the main stakeholders involved during the process
- Set up representatives of the communities for regular dialogues with communities
- Catch in time all grievances related to the land acquisition, land clearing, planting and other processes involving local communities
- List all the documents to be produced and archived during the process

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

II. DEFINITIONS

III. REFERENCE DOCUMENTS

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

IV. RESPONSABILITY

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

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

2. Are there local communities (landlord communities)?
   - YES
   - NO: No FPIC

3. Identification of community Representatives committee (Communities)

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

5. Do the communities want the projects?
   - YES
   - 1st agreement
   - NO

6. Participatory mapping (social team, GIS, CLC)

7. Do the communities still want the project?
   - YES
   - 2nd Agreement
   - NO

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

END
Negotiation process
(Management, SD, CAM, CLC)

Community consensus building
(CLC and community)

Do the communities still want the projects?

YES

3rd Agreement

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

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

NPP process
(SD)

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

Participatory monitoring
(Operation, SD, CAM, CLC)

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

NO

END

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### a. FPIC associated documents

<table>
<thead>
<tr>
<th>No.</th>
<th>Documents to be issued before meetings</th>
<th>Documents issued/endorsed after meetings or negotiations</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Invitation letters (key stakeholders)</td>
<td>Copies of acknowledgement of receipt of invitation letters</td>
</tr>
<tr>
<td></td>
<td></td>
<td>, reports or meetings minutes, map of existing communities around the targeted area</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>List of community representative committee + acknowledgement letter by the company</td>
</tr>
<tr>
<td>3</td>
<td>Letter to request the list of community representative committee</td>
<td>Minutes of the outreach meeting, attendance list.</td>
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<tr>
<td>4</td>
<td>Invitation letter for outreach meeting</td>
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<td>5</td>
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<tr>
<td>6</td>
<td></td>
<td></td>
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<tr>
<td>7</td>
<td>Invitation letters for participatory mapping</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td>Meetings minutes, base map and GIS map endorsed by the communities</td>
</tr>
<tr>
<td>9</td>
<td>Invitation letters for various negotiation meetings</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td>Negotiation meetings minutes + attendance list</td>
</tr>
<tr>
<td>11</td>
<td>Draft copy of MoU for communities inputs</td>
<td>Draft copy of MoU with communities inputs or letter</td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Final copy of the MoU with communities inputs</td>
<td>Signed copy of the MoU</td>
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<tr>
<td>14</td>
<td></td>
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<tr>
<td>15</td>
<td>List of people entitled to compensation</td>
<td>Payment evidences</td>
</tr>
<tr>
<td>16</td>
<td></td>
<td>NPP submission documents (HCV; ESIA, FPIC reports, ...)</td>
</tr>
<tr>
<td>17</td>
<td></td>
<td>NPP notification</td>
</tr>
<tr>
<td>18</td>
<td></td>
<td>Monitoring reports</td>
</tr>
<tr>
<td>19</td>
<td></td>
<td>Complaints management base data.</td>
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</table>