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1.0 INTRODUCTION

The main aim of this procedure is to establish a framework that guides, informs and define elements of PSG communication between PSG and its external stakeholders. PSG communicates and responds to information regarding its operations and management to its stakeholders. This information also relates to the company's Environmental Management Systems, compliance to legal and other requirements including Social Management Plans (SMP), Roundtable on Sustainable Palm Oil (RSPO), Global Platform for Sustainable Natural Rubber (GPSNR), European Deforestation Regulation (EUDR), Corporate Sustainability Reporting Directive (CSRD), and other related issues/complaints/feedback received from stakeholders such as regulatory bodies, communities, NGOs and other interested parties.

2.0 SCOPE

The external communication procedure applies to the following;

- a. External stakeholders (Regulatory bodies and NGOs/CSOs).
- b. Communities
- c. Others (Media, Customers, Potential business partners and Other interested parties)

Communication within the company is guided by the Internal communication policy.

3.0 RESPONSIBILITY

- The General Manager (GM) has overall responsibility for the implementation of this procedure. Communication with external stakeholders including but not limited to business partners, regulatory bodies, NGOs/CSOs, media, etc. are directly handled by the GM or his designate. GM must approve all publications and/or communication of sensitive information to stakeholders.
- The Sustainability Manager (SM) is responsible for coordinating information from the various departments to facilitate communication with external stakeholders. These responsibilities include ensuring availability and regular update of publicly available company documents as well as documents or information that are available upon request.
- The Community Relations Division (CR) in Sustainability Department (SD) is responsible for all communication with communities around PSG's operational area. CR will also ensure all communities are provided with all relevant company documents and information. The Community Relation Officer (CRO) will ensure that this procedure is communicated, implemented, documented and made available to all relevant stakeholders.

4.0 TIMEFRAME FOR RESPONSE

All correspondence with stakeholders would be treated in a timely manner, considering the accuracy of the information. The time frame for response to request for information ranges from immediate, 7, 14-21, 30 or more than 30 days depending on the nature of information request. The time frame

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is defined in the Request for information log which captures all requests for information from stakeholders.

5.0 DEFINING STAKEHOLDERS

Defining the stakeholders who have influence or interest in the operations of the company helps to design and implement appropriate channels of communication. PSG's stakeholders are grouped into three (3) broad categories, namely external stakeholders, communities and others.

External Stakeholders	Regulatory bodies; <ul style="list-style-type: none"> - Lands Commission - Forestry Commission/Forestry Services Division (FC/FSD) - Water Resources Commission - Environmental Protection Agency (EPA) - District Assemblies - Etc. NGOs/CSOs; <ul style="list-style-type: none"> - Eco Care - RSPO - Proforest - Solidaridad West Africa - Conservation Foundation - Forest Watch - Conservation International - Other NGOs/CSOs relevant to oil palm and rubber plantations.
Communities	Over 30 local communities around PSG's concession (details in Social Management Plan)
Others	<ul style="list-style-type: none"> - Media (television, radio & newspaper) - External Service Providers - Customers - Potential business partners - Other interested parties

6.0 CHANNELS

PSG provides channels for a two-way communication with all stakeholders to facilitate the sharing of information, reporting of grievances and other engagements. The channels of communication are tailored to the specific stakeholder and appropriate language is used to ensure adequate understanding of message or information.

6.1 PSG Communication to Stakeholders

Public documents on PSG Dashboard;

The PSG Dashboard is a general communication channel readily accessible to all stakeholders. The aim of the PSG Dashboard is to make publicly available relevant PSG policies/documents to stakeholders without them having to request for the documents. Relevant PSG policies/documents include Environmental, Human Rights, No Discrimination and Equal Employment, No Child Labour,

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Rare Threatened and Endangered (RTE) species, social programs, reports, minutes, etc. The link to the PSG Dashboard is:

<https://www.socfin.com/dashboard/en/plantations-en/psg-en/>

This link is posted on local communities' notice boards for easy access and reference for community members. Other documents such Occupational Health and Safety plans, plans and impact assessments relating to environmental and social impacts, details of complaints and grievances, and public summary of certification assessment report are made available upon request to stakeholders.

Other channels used by PSG to communicate with stakeholders include;

- Notice Boards posts
- Reports/Minutes
- Memos
- Phone calls from GM/Secretariat/HoDs/CR
- Letters/enquiries
- Emails from GM/Secretariat/HoDs/CR
- Meetings/consultations

Information/responses, through any of the above channels, to external stakeholders from Employees who are not capture under section 3.0 RESPONSIBILITY of this procedure should only be considered as personal opinion. Where such information is required/requested (whether through official or unofficial media), employees shall refer such requests (through their HOD) to the General Manager or to Socfin's dedicated email address media@socfin.com.

6.2 Stakeholders Communication to PSG

Channels used by stakeholders to communicate to PSG include;

- Meetings/Consultations
- Phone calls to Secretariat/CR
- Request for information from PSG
- Emails to GM/Secretariat/HoDs/CR
- Letters/Enquiries/Demand notice



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PSG Communication to external stakeholders					
Stakeholder groups	Channels	Communication	Responsible	Timeframe Records	
Regulatory bodies	Reports	<ul style="list-style-type: none"> - Social and Environmental Impact Assessment (SEIA) reports and quarterly reports on implementation of Environmental Management Plan (EMP) to EPA. - HCV-HCS reports to RSPO. 	GM/SM/CR/ HoDs	When required/quarterly	Reports, letters, minutes of meetings/consultation, email records,
	Letters	<ul style="list-style-type: none"> - Letters providing updates on company operations to District Assemblies, FC/FSD, etc. - Letter of enquiry on land tenure or forest management to Lands Commission and/or FC/FSD. 			
	Meetings/consultations	<ul style="list-style-type: none"> - Meetings with District Assemblies to maintain and/or improve collaborations regarding operational and developmental impacts in the catchment area. - Consultations with EPA, FC/FSD and/or Lands Commission to guide plantation operations and ensure compliance. 			
	Phone calls	<ul style="list-style-type: none"> - To provide information, make enquiries or schedule meetings. 			
NGOs/CSOs	Meetings/consultations	<ul style="list-style-type: none"> - Consultations to collaborate with NGOs/CSOs to support local communities' development. 	GM/SM/CR/ HoDs	When required	Minutes of meetings, news articles on website, email records
	Media Reports	<ul style="list-style-type: none"> - To inform NGOs/CSOs of PSG's impact on local communities, including development projects. 			



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Communities	Emails, phone calls	<ul style="list-style-type: none"> - Reporting on the company's environmental and social commitments to RSPO, GPNSR, EUDR, CSRD ISO 14001 etc., -To provide information, make enquiries or schedule meetings. 	CR	When required, 4-months interval period,	Announcements letters, summary reports, letters, minutes of meetings/con sultations/engagements, job adverts, results of water quality test, request for information log, grievance log
Communities	Notice boards	<ul style="list-style-type: none"> - PSG notice boards are placed in local communities to share company information that are relevant to them. PSG relevant documents/policies including Human Rights, No Discrimination and Equal Employment, No Child Labour and Rare Threatened and Endangered (RTE) species are posted on notice boards to make them publicly available to local communities. Other information such as job advertisements, results of water quality test and memos are also posted on the notice boards. 			
Communities	Community announcement (PA) Systems	<ul style="list-style-type: none"> - The PA system is used to complement notice boards in sharing information in local communities. Information posted on the notice boards are explained in the local language (Twi or Fante) through the PA system to ensure community members understand the information being shared. 			
Communities	Meetings/consultations/engagements	<ul style="list-style-type: none"> - Regular meetings are held in local communities to discuss development projects, grievances and complaints and other issues of mutual interest. It also provides a platform to train local communities on relevant company documents/policies, including summaries on the company's EMS performance, plans and 			



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	<p>Letters/enquiries</p> <p>Phone calls</p>	<p>outcomes associated with operations as well as mitigation measures.</p> <ul style="list-style-type: none"> - Letters are sent to local communities to provide feedback on grievances or enquiries or to invite community members for a meeting/consultation. PSG usually follows up with phone calls to ensure local communities understand the contents of letters sent. - Phone calls are made to local community representatives to provide feedback on grievances or enquiries or to schedule a meeting/consultation. CR or GM as a follow up use phone calls to discuss contents of letters, memos or job vacancies sent out to local communities. 		
Media	<p>Reports</p> <p>Meetings</p> <p>Phone calls</p>	<ul style="list-style-type: none"> - Public summary of assessment reports such as RSPO are shared with the relevant communities. - To discuss the company's interest in a media release. - To provide feedback on enquiries from media. - To provide feedback on enquiries or to schedule meetings with media representatives 	GM	Minutes of meetings
External Service Providers	<p>E-Mail, Phone calls, WhatsApp, photos</p>	<ul style="list-style-type: none"> - Contracts or purchase orders - EMS and OHS and associated and applicable regulatory requirements 	GM, FM, HoDs, Purchase Superintendent	When required Contract Agreement, Purchase orders, Contractor/Supplier registration form, Code of Conduct, Due



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				Diligence Records, E-Mails
(Potential) business partners/customers and Other interested parties	Phone calls, emails	- To make enquiries about partnerships or business proposals. - To schedule meetings.	GM/secretariat/HoDs	When required

External stakeholder communications to PSG

External stakeholders	Channels	Communication	Responsible	Timeframe	Records
Regulatory bodies	Letters/Demand notice Meetings/consultation Emails, phone calls	<ul style="list-style-type: none"> Letters to invite PSG for meetings or consultations. Letters to notify PSG of new regulations or standards for compliance. Demand notice for payment of rent, property rate, business operating permit, etc. Meetings to discuss operations or standard practices of the company. Consultations to improve collaboration with PSG To schedule meetings or consultations with GM/Secretariat/CR To provide information or feedback to enquiries made by PSG. To follow up on letters/demand notice sent to PSG. 	GM, SM, CR, HoDs	When required/ yearly	Letters, email records, minutes of meetings

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NGOs/ CSOs	Letters/enquires	GM/SM/CR/ HoDs	When required	Letters, minutes of meetings, email records
	<ul style="list-style-type: none"> - Letters to invite PSG for meetings or consultations. - Enquiries to know more about PSG's operations. - To discuss collaborations with PSG to support local communities' development. - To schedule meetings or consultations with GM/Secretariat/CR. -To provide information or feedback to enquiries made by PSG. 			
External Service Providers	Meeting/consultations Emails/phone calls			
Media	E-Mail, Phone calls, WhatsApp, photos Meetings Phone calls, emails	GM, FM, HoDs GM/Secretariat/CR	When required When required	E-Mails, reports Minutes of meetings, request for information log



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Communities	Letters/enquires	Local communities send letters to CR or GM's office to request for assistance or to report grievances or complaints. Letters are also sent to schedule meetings with PSG. Representatives from local communities visit the CR office regularly to request for assistance/information or report grievances and complaints. It is also a channel to follow up on grievance resolution processes or requests for assistance. In addition to the regular meetings, local communities call for unscheduled meetings on issues of importance and urgency. This usually involves discussions on issues that needs to be addressed immediately. Local community representatives make phone calls to CR or GM to request assistance, information, report grievances or to follow up on issues discussed. They also use phone calls to provide information, make enquiries and schedule meetings.	GM/SM/CR	When required	Letters, visitors log, minutes of meetings/con sultation, request for information log
(Potential) business partners/customers and Other interested parties	<p>Letters/enquires</p> <p>Visits to CR office</p> <p>Meetings/consultations/engagements</p> <p>Phone calls,</p> <p>Phone calls, emails</p>	<ul style="list-style-type: none"> - To make enquiries about company operations, projects, etc. - Product complaints - To establish interest in working with PSG. 	GM/Secretariat/HoDs	When required	Email records, Customer Satisfaction Questionnaire

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7.0 PARTICIPATORY PROCESS

This procedure is developed with communities in a participatory manner through the SMP Q2 and Q3 participatory consultations in 2021 (refer to SMP for details).

8.0 TRANSPARENCY

PSG shall be transparent in all its communications as well as:

- Any sustainability claims made in relation to its products or operations is accurate and verifiable.
- Comply with the requirements set out RSPO Rules on Market Communications and Claims (as amended)
- be appropriate, so that information meets the needs of relevant interested parties, enabling them to participate;
- be truthful and not misleading to those who rely on the information reported;
- be factual, accurate and able to be trusted;
- not exclude relevant information that are non-financial;
- be understandable to interested parties.

9.0 REFERENCES

- Internal communication policy
- External grievance mechanism
- Social Management Plan
- Request for information log
- External Grievance log
- Customer Satisfaction Questionnaire
- Code of Conduct