

Land Use Policy

Natural Habitats is a group of companies dedicated to the production, collection and processing of organic and fair trade palm oil. The group has production operations in Ecuador, Ghana, and Sierra Leone. Natural Habitats has a social and participative business model, that has been providing economic and social benefits to hundreds of farm smallholders, workers and the encompassing communities where it operates, in each of the three countries.

Our land use policy will serve to prevent any conflict in relation to land use and preserve the associated rights of the local inhabitants. This policy will delineate our methods of conflict prevention and will provide the current owners and occupants of the land with appropriate information relating to their participation and collaboration with the Natural Habitats Group.

- ❖ Natural Habitats will ensure the affected parties are given free, prior and informed consent (FPIC), when in consultation for the development of any projects. We will not pursue projects where the communities have been denied this consent process or having undergone it, they have not given their consent.
- ❖ Natural Habitats works with independent smallholders, who are not bound by any contract, credit agreement or panning to the company's mill. The farmers are free to choose what to grow on their land and where to process their products.
- ❖ The leasing of land for our future operations will not diminish the legal, customary or user's rights, including those that may rely on the land access for their livelihoods (especially women). We will endeavour to fully communicate all the possible impacts of land conversion to the affected communities. This will be done by sensitising the local communities to the potential costs and benefits of a potential Natural Habitats project.
- ❖ We will strive for complete transparency when completing land lease arrangements. Our consultations and negotiations will include a high proportion of women, as we recognise that although women may not have legal or even customary rights to the land in question, they depend on land access for their livelihoods and for food security of their families and communities.
- ❖ We shall provide all relevant information in appropriate forms and languages, including but not limited to impact assessments, proposed benefit sharing and legal arrangements. All leases and Memorandums of Understanding (MOUs) will be provided to all signees, and accessible at any time through a mobile accessible web site.

- ❖ We will respect and support the rights of the local community to access land for food, nutritional and religious security. An effective environmental management system will be implemented to protect land, water and vegetation in our lease areas. The protection of local resources, waters sources, medicinal plants and wildlife will be critical for the overall health of the affected communities.
- ❖ Natural Habitats expressly prohibits the use of mercenaries and para-militaries in any of our operations. In addition, any contracted security forces are forbidden from engaging in extrajudicial intimidation or harassment. We will not tolerate any traditional or local authorities, coercing or threatening local communities on behalf of Natural Habitats.
- ❖ Local communities should have access to independent legal representation, to assist them with the negotiation of their interests and to ensure fair compensation and consent with the lease agreements.

Reporting of Transgressions

Natural Habitats Group encourages the reporting of any transgressions against this policy.

All **employees** of the group should address such reporting primarily to their supervisor. If the supervisor is part of the issue the matter should be addressed directly to the head of the relevant business unit or the group sustainability department. All communication will be treated as confidential and will not result in any disciplinary action or retaliation against the persons making them.

External stakeholders are advised to report any breach of this policy to the Group Sustainability Department of NHG. There is a grievance procedure available on the group's website through which the reporting can be done.