# Grievance List

*Last updated April 2022*

## A. Cases in process

<table>
<thead>
<tr>
<th>No.</th>
<th>Date and Subject</th>
<th>Stakeholder (s)</th>
<th>Allegation and progress</th>
<th>Status</th>
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<tbody>
<tr>
<td>R-001</td>
<td>18-April-2017</td>
<td>NGO Coalition:</td>
<td><strong>Pollution of La Pasión River.</strong> In 2015, two events of pollution and fish mortality occurred in La Pasión River, located in Sayaxché, Petén where REPSA operates:</td>
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<td>- Mighty</td>
<td>- <strong>I Event, April 2015:</strong> at the beginning of May 2015 local people notified the Ministry of Environment and Natural Resources (MARN in Spanish) of a fish kill in La Pasión River. On May 5th, REPSA notified MARN that due to heavy rains, one oxidation pond located at the final-stage of the special wastewater treatment system for palm oil mill effluent (POME) at REPSA II mill had overflowed and discharged palm oil mill effluent into a tributary of the of La Pasión River.</td>
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<td>- Fundación Due Process of Law</td>
<td>- <strong>II Event, June 2015:</strong> in early June, MARN was notified again about a new fish kill in La Pasion River, which, according to Guatemalan authorities, impacted more than a 100 kms, affecting around 16 communities. This incident was declared an “ecological disaster” by MARN. Results of preliminary sampling analyzed by National Laboratory of the Ministry of Public Health and Social Assistance and by the Toxicology Laboratory of San Carlos University showed presence of <em>malathion</em> in the river (an</td>
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<td>- Agencia de Investigación Ambiental – US</td>
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<td>In progress</td>
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<td>- Foro International Labor Rights</td>
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<td>- Sum Of Us</td>
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<td>- Rainforest Action Network</td>
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insecticide used in agriculture). Authorities pointed out three palm oil companies located near the riverbanks who they suspected were responsible. In June 2015, MARN accused REPSA before the Prosecutor’s Office (MP in Spanish) of being responsible for the June fish kill.

Since mid-2015, MP, accompanied by MARN and other entities, have visited REPSA nine times to search for evidence of the June incident. Overall, the company has received more than 20 visits from other governmental authorities, some of them accompanied by research and scientific institutions. At present, this case is under the jurisdiction of the Court of Criminal Narcoactivity and Crimes against the Environment of Cobán, Alta Verapaz.

* For reference, you can read press release published in MARN’s website on June 10, 2015:

http://www.marn.gob.gt/noticias/actualidad/PROBLEMA_DE_MORTANDAD_DE_PECES_Y_OTRAS_ESPECIES_ACUTICAS_EN_EL_RIO_LA_PASN

**ACTIONS TAKEN BY THE COMPANY**

- In May 2015, REPSA began to enhance its special wastewater (POME) treatment system. The company increased the number of lagoons in the two mills (REPSA I and II), expanded the lagoons’ hydraulic retention capacity, and improved their design, reducing depth and increasing the area of exposure to wind and sunlight to make the organic load removal process more efficient. It also carried out preventive measures, such as the enlargement of the perimeter of the rainwater channels and the installation of an emergency lagoon with 7-daLa ys capacity to reserve POME.

Recognizing the importance of adopting a proactive approach and engaging in broader monitoring efforts, and even though legal responsibility for the June event has not been assigned and the case remains unresolved, REPSA has been carrying out the following actions:
- **Policy of Zero Discharge of Effluent:** in 2018 REPSA released its upgraded *Policy on Responsible and Sustainable Production*, which includes an environmental commitment that addresses zero discharge of effluent and recognizes that discharge and treatment of wastewaters is a responsibility that must be carried out safely while complying with applicable environmental regulations and international standards of the palm oil industry.

- **“Open doors” initiative:** to share company’s agricultural, industrial and environmental best practices with stakeholders. Since it was launched, REPSA received more than 300 visitors, among them local leaders, representatives of public institutions and community members. Stakeholders have visited plantations, the plant health laboratory and mills to observe the wastewater treatment process, they have also received information in regards to the company’s occupational health and safety practices.

- **Composting plant:** REPSA has a 10 hectares plant where it processes fresh fruit bunches (FFB) spines and treats 70% of the effluent from REPSA I mill to produce organic compost. According to the “Monitoring Report on the Actions of palm oil Companies in Sayaxché, Petén” conducted in 2019 by an international NGO with presence in Guatemala: «Study found that the companies REPSA (visited) and company “X” (according to its website) have composting plants, which they irrigate with the water that comes from the lagoons of fertigation, as a way to recycle wastewater, which ends up evaporating after repeating the cycle several times.»

- **Methane capture:** covered the first two oxidation lagoons of the POME treatment system of REPSA II mill to capture methane gas. This also reduces the risk of overflowing and lowers the emission of Greenhouse Gases (GHG) significantly.
- **Environmental Monitoring**: evaluation of water quality in 44 sites within REPSA’s operations, including the wastewater treatment systems at the mills. Internal monitoring is carried out on a monthly basis and external monitoring is conducted by an independent laboratory every six months.

- **Participatory Program to Monitor Water Quality**: invites community members and stakeholders to accompany sample taking in specific sites - including wastewater treatment systems and surface water bodies that circulate through the company’s operations - which are analyzed by an independent laboratory in order to assess compliance with parameter established in Governmental Agreement 236-2006. REPSA shares results in the Municipal Council for Development (COMUDE in Spanish) of Sayaxché and reports on results publicly through its Progress Reports as an effort to build trust among stakeholders and encourage their engagement in this program.

  See Progress Reports: [link](#)

- **Differentiated Management Plan** for 396 hectares of palm trees located 10 meters from intermittent water bodies.

- **Reforestation of Riparian Areas**: 157 hectares of riparian zones reforested with native species between 2016 and 2018.

- **Conservation Plan for Riparian Zones** for 213 hectares.

- **Governability Roundtable for the Palm Oil Sector in the North Area of Guatemala (GRT)**: REPSA actively participated in this initiative that aims to coordinate companies’ actions to generate affable conditions for palm operations in the region. In order to encourage a comprehensive approach in the management of hydric resources, REPSA shared Grupo HAME’s experience participating in watershed committees in the South Coast of Guatemala and the benefits of companies, communities and local stakeholders working together and adopting responsible practices. Unfortunately, due to lack of participation, at the moment these meetings have been suspended.
- **Captive breeding of native species of fish of La Pasión River:** project that aims to contribute to the repopulation of the river, as well as to help create alternative income-generating activities in neighboring communities. Already authorized by the Ministry of Environment and Natural Resources (MARN), currently in research phase. The project will be officially launched once the company determines if it will be implemented within a broader strategy (see below).

- **Comprehensive Action Plan for La Pasión River:** considering crucial to address stakeholders’ concerns, REPSA consulted civil society organizations and other key stakeholders on their perspectives and expectations regarding the viability of designing and executing a multi-stakeholder project for the comprehensive management of the micro river basins of La Pasión River in Sayaxché. Based on the results, REPSA defined the scope and the strategic goals of the “Comprehensive Action Plan for La Pasión River”. The Municipality’s competences for the efficient administration of natural resources were reviewed and enhanced, and a local team was assigned to work on this initiative. REPSA and the Municipality carried out participatory workshops with community members and local stakeholders to conduct assessments on the 8 micro river basins that were prioritized, created a committees, and designed the Plans for the Comprehensive Management of each micro river basin. These plans were integrated into the 2022 Operative Plan of the Municipality of Sayaxché.


*Grupo HAME’s Sustainability Policy: [https://grupoahame.com/vision-sostenibilidad/](https://grupoahame.com/vision-sostenibilidad/)

*More on our POME treatment process: [https://grupoahame.com/procedimientos/](https://grupoahame.com/procedimientos/)
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<th>Case Reference</th>
<th>Date</th>
<th>Description</th>
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<td>R-018</td>
<td>07-April-2022</td>
<td>Application of compost in plantations nearby communities</td>
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Consejo Nacional de Desplazados de Guatemala (Condeg)

**Application of compost in plantations nearby communities**

On April 7, 2022, Condeg sent a note outlining the concerns/bothers of members of neighboring communities about:

- bad odors and proliferation of flies in the communities surrounding the plantations where compost (organic fertilizer) is applied.
- possible environmental impacts of the application of compost (organic fertilizer) and fertigation in the plantations.

**ACTIONS TAKEN BY THE COMPANY**

The case was admitted to the Grievance Mechanism to be addressed through the procedure for public complaints. On April 8th, REPSA confirmed the reception of the case to CONDEG.

The Public Complaints Committee analyzed the content of the note and defined a verification strategy, currently in progress.
B. Resolved cases

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<th>Allegation and progress</th>
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| R-003 | 18-April-2017  
Complaints related to river pollution incident and human rights abuses. | NGO Coalition (see above) | **Detention of three members of the National Council of Displaced Persons (CONDEG).**  
In September 2015, members of the surrounding communities, local business owners and REPSA workers blocked national highway CA14 at km 355, La Torre village, for a period of approximately 12 hours, in order to protest against a judge’s decision to temporarily close the company to investigate the pollution incident in La Pasion River (June event). During the protest, protesters identified three members of CONDEG among people who were passing by and illegally retained them for approximately 8 hours.  
In early 2018, REPSA conducted an internal investigation as a first structured attempt to understand what happened during the September 2015 incident. Investigation entailed interviews conducted by REPSA’s Corporate Affairs team to managerial personnel of REPSA, a community leader (not employed by REPSA) and local businessmen.  
A few notes:  
- REPSA recognizes this investigation should have been conducted immediately after the incident was reported and that its initial reaction did not address the incident appropriately.  
- In past communications, REPSA denied involvement of its workers in this incident, which was a mistake since the company had not properly investigated and did not have sufficient information to make statements of that kind.  
- REPSA recognizes that the company’s previous communications delegitimized activists and sincerely regrets it. | Closed  
The case was dismissed by the Prosecutor’s Office (Public Ministry) due to the complainants’ decision to desist.  
*Within the case file it can be verified that REPSA did not appear as an accused nor involved party, there was not nor is there any legal action of any kind against the company.* |
This internal investigation does not intend to replace any potential joint fact-finding or dialogue process with CONDEG to address this incident. It also does not intend to affect nor interfere with the legal process conducted by the Prosecutor’s Office.

**FINDINGS OF INTERNAL INVESTIGATION**

Through the internal investigation, we learned that several local business owners provided food and transportation to protestors. These people stated that they did so in order to support the protest. As far as we can determine, REPSA’s management did not request or pay for food and transportation. However, some of these businesses are suppliers and service providers for REPSA.

During the protest, one of REPSA’s managers notified the Governor of Petén, and local representatives of public institutions, Human Rights Ombudsman’s Office (PDH in Spanish) and the National System for Dialogue, to seek their intervention. REPSA recognizes that it failed to measure the level of discontent caused by this temporary closure among its workers, suppliers and communities; likewise, it regrets not taking stronger actions to dissuade workers and suppliers from organizing a protest that could potentially lead to acts of intimidation.

The company also regrets not having done enough and not having at that time proper procedures to prevent such an incident.

REPSA is aware of the seriousness of this incident and rejects these actions, which considers unacceptable under any circumstance. The company reiterates that restricting personal freedom -in any of its expressions- is an activity that we do not condone by our workers. Any involvement with or support to the illegal retention of CONDEG members by any entity within REPSA’s supply chain represents a breach of the company’s values and policies.
**ACTIONS TAKEN BY THE COMPANY**

- **Update and socialize the Code of Ethics** with workers to ensure respect of human rights is encouraged, both inside and outside the workplace and while participating in community related activities. REPSA is hoping to improve this process by building upon lessons learned from 2018 and from the results of a recent evaluation conducted by an external organization.

- **April 2018**: *capacity building workshops*, carried out by the Consensus Building Institute (CBI), for the teams in charge of socializing the Commitment to Prevent Violence and Intimidation.

- **May 2018**: launch of new **Grievance Mechanism** to address and resolve complaints and queries from workers, communities, and stakeholders, in a fair, transparent and timely manner.

- **July 2018**: restructure and enhancement of **Training Unit** with more staff was and a new approach aimed at training on corporate policies and values. The Unit has within its responsibilities to standardize trainings, develop support materials (taking into consideration the literacy levels of field workers), systematize training registration to track dissemination of the policy to make sure all workers have been trained, and to evaluate comprehension to ensure they understand the spirit of the policy.

- **October 2018**: update and strengthening of **Policy on Responsible and Sustainable Production**, with a specific **Commitment to Prevent Violence and Intimidation**. The content within this commitment was reviewed and enriched with input from the Ombudsman’s Office (PDH in Spanish). Said commitment applies to all those involved in REPSA’s supply chain – workers, suppliers and service providers-, and the company will take disciplinary measures, including the possibility of suspension or dismissal of workers and/or suppliers involved in actions that violate it.


We hope these follow-up actions can also serve as the basis for direct dialogue with affected stakeholders in order to create strategies for joint fact finding, work towards a mutually agreed upon resolution to this incident, and to identify actions that can help prevent events like this in the future.

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<th>R-004</th>
<th>18-April-2017</th>
<th>NGO Coalition (see above)</th>
<th>Workers' conditions</th>
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|       | Complaints related to river pollution incident and human rights abuses. | In March 2017, OXFAM published a report titled Human Rights and Environmental Impacts of Palm Oil in Sayaxché, mentioning some labor and trust concerns. According to the report, “workers in REPSA have raised concerns regarding failure to pay minimum wage, poor conditions of temporary workers and several conflicts between workers and the management that remain unresolved.” | **ACTIONS TAKEN BY THE COMPANY**

- March 2017: Ernst & Young conducted an **audit of REPSA's labor practices** to analyze labor management and issue recommendations on hiring practices and working conditions. Results reflected a high level of compliance with the labor obligations established by Guatemalan legislation and satisfactory compliance with basic constitutional rights as well as treaties with the International Labor Organization (ILO) signed by Guatemala. The audit also identified the importance of achieving balance between the number of temporary and permanent workers, and the need to build trust in the Grievance Mechanism. Results of the audit can be seen in the following link: [Ernst & Young Report](#).

- December 2017: the Ministry of Labor and Social Welfare (MINTRAB in Spanish) did a routine inspection to verify REPSA's compliance with labor legislation. Among the aspects assessed were the payment of minimum wages, worker conditions and benefits, occupational safety and health, and administrative procedures of the Human Resources department. After reviewing documents and payrolls of months prior to the inspection,
MINTRAB report determined that REPSA complies with national labor legislation and guarantees the payment of minimum wages to all its workers.

- **Conditions of temporary workers**: REPSA has 9 housing sites to accommodate temporary employees who work for the company during high production seasons. In 2017 and 2018 REPSA renovated the housing sites and built new dormitories in order to ensure compliance with the commitment to guarantee a 3.8 m² of minimum living space per person to all workers; a measure that exceeds the standard of the International Labor Organization (ILO), which establishes a minimum 3.6 m² per person.¹

- **Infrastructure conditions**: toilet facilities, showers and laundry areas were also repaired / remodeled to ensure all workers have access to safe and private well-maintained sanitation facilities.

- **Hygienic conditions**: the Occupational Health and Safety Department carries out a program to supervise cleaning of housing sites on a daily, weekly and quarterly basis, including rooms, bathrooms, showers, corridors, laundry tubs, dining room, kitchen, water treatment and purified water dispensers.

- **Quality of water for human consumption** is guaranteed through periodic evaluations of the water purification system in all housing sites, conducted both internally –by the company’s laboratory- and externally by an independent duly accredited laboratory.


We expect that the new **Grievance Mechanism** and the training of workers on the commitments within the new **Policy on Responsible and Sustainable Production** –

| R-005  | March 2017 | Friends of the Earth (FoE) | **Intimidation allegations during visit of international mission on November 11, 2016.**

On November 11, 2016, an international mission visited Sayaxché in the framework of the meeting of the *International Mission of Observers for Human Rights in the Guatemala-Mexico Border Region*.

According to a report written by Friends of the Earth (FoE) in March 2017:

- REPSA employees allegedly disrupted this closed-door, invitation-only event. According to eyewitness accounts and photo and video documentation, REPSA employees arrived uninvited, blocked the three entrances to the meeting venue, and confronted members of the delegation. The meeting had to be cancelled because of the security threat felt by the participants, which included over 13 international observers, among them international jurists, religious leaders, human rights activists, and a European Parliamentarian.

- According to local participants, these REPSA employees were transported to the location by two company buses, which were seen parked near the venue. Mission participants described that REPSA employees continued to follow the international delegates to two other events later that day, to aggressively confront the delegates and local organizers.

- Eyewitnesses overheard REPSA employees state they had attended the first meeting with the goal of provoking a violent confrontation that would serve as a pretext to kill one of the community leaders from the Commission for the Defense of Life and Nature.

- During the following days, REPSA employees reportedly threatened two of the international Mission delegates and one of the local organizers. The representative / spokesperson of La Comisión para la Defensa de la Vida y la Naturaleza declared in two sections of the report of the November 11, |

*The company held a meeting with the representative of the Commission for the Defense of Life and Nature in January 2019, which was mediated by the Regional Auxiliary of the Human Rights Ombudsman Office of La Libertad Petén and the Procedures Officer of the Municipal Auxiliary of La Libertad, Petén.*

The parties agreed that communication channels between both parties can be improved to avoid misunderstandings.
In late 2017, REPSA conducted an internal investigation with the purpose of having a better understanding of what happened on November 11, 2016. REPSA used the Incident Report of FoE among other references—public reports and articles on the event, media pieces- to direct its lines of inquiry.

A few notes:

- REPSA recognizes this investigation should have been conducted immediately after the incident was reported.
- REPSA also recognizes that its initial reaction was not adequate and did not contribute to addressing the incident appropriately.
- In past communications, the company got to wrong conclusions, which was a mistake, since it had not properly investigated and did not have sufficient information to make statements.
- REPSA recognizes that its previous communications delegitimized activists and sincerely regrets it.

This internal investigation report does not intend to replace any potential dialogue/joint fact-finding process with La Comisión por la Vida y la Naturaleza to address this incident. The report also does not intend to affect nor interfere with the legal process conducted by the Public Prosecutor’s Office (Ministerio Público).

The information compiled in the internal investigation report was obtained through interviews and document review. Interviewees include community and local leaders, as well managerial staff of REPSA. Document review included press releases, videos, reports, news articles, social media activity and statements from public institution representatives. Interviews and testimonials were crosschecked to help have a better understanding of the incident.
<table>
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<th>FINDINGS OF INTERNAL INVESTIGATION</th>
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<td>The results of the internal investigation showed that, some of the company’s workers who attended the event were invited (as community and local leaders), while others were not. According to the interviewees, around 20-25 leaders and representatives from Sayaxché’s communities, REPSA employees among them, attended the first of three meetings held by an international mission on November 11, 2016 in Sayaxché.</td>
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<td>On November 8th 2016 REPSA’s Community Affairs team received a petition from community leaders requesting transportation in order to attend an event in Sayaxché that same month. The request stated there will be a meeting of the “International Mission of Observers for Human Rights in the Guatemala-Mexico Border Region” on November 11th, and that COCODES from El Pato and La Ceiba wanted to take the opportunity to attend the meeting in order to share their concerns about employment and migration. They requested REPSA’s support with transportation in order to bring a group of 25 people (COCODE members, “Auxiliary Mayors”, and other leaders of Sayaxché).</td>
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<td>The company agreed to provide the bus service that took them to the meeting in Sayaxché and back to their communities. Workers that are also community and / or local leaders are usually granted permission to leave work to attend community related events, and they often request the company’s support providing transportation. Other interviewees stated they arrived to the meetings by their own means.</td>
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<td>A member of REPSA’s Community Affairs team decided to attend the events and according to him, observed the three meetings from outside the venues, he did not participate or speak. He explained that he was not asked to attend by REPSA’s Management nor by the Corporate Managers, but decided to go with the purpose of understanding the role of local leaders in community related events.</td>
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<td>Another employee, together with community leaders (who were not employed by REPSA), attended the second and third meetings of the international mission in</td>
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Santa Elena. The employee said he had insisted—during the three meetings—on taking the floor to speak to the mission about a topic of his personal interest.

REPSA recognizes there might be aspects of this incident that will not be uncovered by this internal investigation. The company believes these results can be improved through a joint fact finding effort with the aggrieved party and/or other stakeholders.

**ACTIONS TAKEN BY THE COMPANY**

Aware of the fact that some of the workers who attended the events carried out actions perceived as intimidating by participants and delegates of the mission, and that this indicates a serious breach in the *Commitment to Prevent of Violence and Intimidation*, the company has outlined specific actions to prevent this from happening in the future. Among them, the formalization of criteria to grant support and/or means to workers to participate in community-related, in which REPSA began to work in 2018 within its social management system. Other specific actions are listed above in the CONDEG case as follow-up actions.

We hope these helps start a direct dialogue with affected stakeholders in order to work together towards a mutually agreed upon resolution to this incident.

<table>
<thead>
<tr>
<th>R-006</th>
<th>July 2018</th>
<th>Consejo Nacional de Desplazados de Guatemala (CONDEG)</th>
<th><strong>Workers’ benefits (payment of “Bono 14”).</strong></th>
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<td>On July 26, 2018 CONDEG submitted a complaint to REPSA’s Grievance Mechanism, on behalf of some workers who claim the company did not make the full payment of the “Bono 14” benefit (annual bonus established by Guatemalan labor legislation) in July 2018.</td>
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<td>On July 31st, 2018 CONDEG filed another complaint expressing its disagreement with the way the grievance of July 26, 2018 was being managed, as well as the following allegations:</td>
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Resolved
- Miscalculations in the payment of “Bono 14” benefit, questioning the amounts on workers’ vouchers.
- Increase in abuse and mistreatment against workers.
- Retaliation against workers identified as potential complainants of the July 26 grievance.
- Increase in the established goals / tasks of certain positions.
- Mismanagement of grievances by the Complaints and Queries Manager.

On September 13, 2018 CONDEG sent a third note to REPSA in which it reiterates the allegation of non-compliance with the payment of Bono 14 benefit and questions the payment of compensations by the company.

**ACTIONS TAKEN BY THE COMPANY**

The complaint of July 26 2018, related to Bono 14, was registered in the Grievance Mechanism (with reference number 5882) and addressed according to the procedure to manage labor related grievances. ([http://repsa.com.gt/en/descripcion-general/](http://repsa.com.gt/en/descripcion-general/))

- The Ministry of Labor and Social Welfare (MINTRAB in Spanish), which is the governmental institution appointed to determine if companies’ payments comply with labor legislation, conducted 2 inspections in REPSA.

  - **I Inspection:** August 2, 2018. Through its local delegation of Sayaxché, MINTRAB carried out an inspection to verify compliance with the payment of the *Annual Bonus for workers in the private and public sectors* “Bono 14” (Decree 42-92), as well as to corroborate that work contracts were duly reviewed by MINTRAB’s Department of Labor Administrative Services. REPSA’s compliance with both aspects is documented in MINTRAB’s report No. R-1703-00559-2018.

  - **II Inspection:** October 10, 2018. A national delegation of MINTRAB conducted another inspection to verify, once more, company’s compliance with Decree 42-92 (payment of Bono 14), as well as with other
labor obligations. REPSA’s compliance is documented in MINTRAB’s report No. R-1703-00714-2018.

Following the Grievance Mechanism’s procedure, REPSA contacted CONDEG to confirm the admission of this complaint, filled out registration forms and shared copies of these forms with them. REPSA explained CONDEG that the company payed Bono 14 to all its workers in strict compliance with Guatemalan legislation. Decree No. 42-92, states that "If the duration of the employment relationship is less than one year, the benefit shall be proportional to the time worked", therefore REPSA calculates this amount proportionally to the date each employee starts working for the company. This Decree also stipulates that “The bonus must be paid during the first half of the month of July of each year” and REPSA made said payment to all of its personnel before July 15, 2018. On October 31, REPSA shared with CONDEG the results of the two inspections of MINTRAB regarding the payment of Bono 14 benefit. In both occasions, MINTRAB found compliance with the law, as evidenced by the reports No. R-1703-00559-2018 (August 2, 2018) and No. R-1703-00714-2018 (October 10, 2018). The company is open to discuss the methodology of these reviews and their results with CONDEG and / or any other stakeholder.

Aware of the importance of an effective communication between the company and its personnel, REPSA is currently improving the training of workers on their rights and working conditions through its Training Unit.

The complaint of July 31st 2018, related to mistreatment and abuse of workers, was registered in the Grievance Mechanism (with reference number R-006) and was addressed according to the procedure for public grievances (http://repsa.com.gt/en/descripcion-general/).

- REPSA Corporate Committee met CONDEG to discuss the allegations and the approach to address them. CONDEG provided the company with more elements to conduct an internal investigation.

- In a second meeting, REPSA shared with CONDEG a proposal to investigate this complaint, and both parties agreed on the strategy. After the investigation
was conducted, REPSA shared results with CONDEG. Documentary review and interviews showed there was not an increase in the established goals / tasks during the period of the allegation (July 2018). In addition, none of the workers interviewed expressed having been subject of abuse or mistreatment, and did not complain of the way company treats them. As expressed before to CONDEG, REPSA is open to discuss the methodology and results of this investigation with CONDEG and/or any other stakeholder.

Although the investigation in this case did not demonstrate a specific pattern of abuse, this is an issue REPSA takes very seriously. In that sense, the company is currently working to develop a corporate culture of respect at all levels, through the **Human Rights Commitment** and the **Commitment to Prevent Violence and Intimidation** within its **Policy on Responsible and Sustainable Production**.

| R-007  | November 18, 2018 | Member of Consejo Nacional de Desplazados de Guatemala (CONDEG) | **Security personnel.**
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<td>On November 18, 2018, a member of CONDEG informed REPSA of an incident involving a security guard of the company.</td>
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<td>During a meeting of community leaders held on November 17, 2018 in a community in Sayaxché, participants identified an unknown person. When confronted, this person identified himself as REPSA's security guard and said he had received instruction from his superior to attend the meeting. Community members illegally retained the guard and took his ID (identification document) and cell phone. Two security supervisors of REPSA arrived at the meeting to mediate the release of the guard and were also retained by the community. After a call from the company's Security Manager requesting their release -2 or 3 hours after being retained- the three of them were freed.</td>
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<td>This complaint was registered in the Grievance Mechanism with reference number R-007 and was managed according to the procedure for public grievances (<a href="http://repsa.com.gt/en/descripcion-general/">http://repsa.com.gt/en/descripcion-general/</a>). On November 20, the company confirmed the admission of this case to the complainant.</td>
<td>Resolved</td>
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FINDINGS OF INTERNAL INVESTIGATION

- The Corporate Committee carried out the verification process, which consisted of interviewing members of communities that had participated in the meeting and security personnel of the company at the local and corporate level.

- The investigation determined that the security guard received direct instructions from his superiors to attend the meeting and report its content. As far as investigation could determine, the guard did not share what he had recorded in his cell phone with other people.

ACTIONS TAKEN BY THE COMPANY

- REPSA considers that the instructions given by REPSA’s Chief of Security and the Security Supervisor to the guard represent a clear violation of the commitments adopted in the company’s Policy on Responsible and Sustainable Production, particularly the one to Prevent Violence and Intimidation and the one on Private Security. Therefore, on November 26, 2018 REPSA sanctioned the immediate removal of the two people -Head of Security and Security Supervisor- who gave the instruction to the guard. Therefore, as of that day, they no longer work for REPSA or for any of the companies in the group.

- The security guard involved in this incident did not suffer any type of sanction, considering he acted strictly in compliance with an order received from his superiors. However, for his own personal safety he was offered the option of being transferred to another company within the group, which he accepted.

REPSA recognizes the need to work diligently in the application of its policies in order to prevent similar incidents in the future. Therefore, new training for all security personnel will be conducted to ensure they understand the content, scope and implications of the commitments within the Policy on Responsible and Sustainable Production.
Note with workers’ demands and allegations.

On December 03, 2018 members of CONDEG handed a document with demands from REPSA workers.

After confirming CONDEG the reception of said note, REPSA analyzed its content and identified several allegations that needed to be addressed through the Grievance Mechanism.

These are the allegations and the current status of each one:

- **Allegation: invited attendance of security guard to community meeting.**
  - **Company’s actions:** incident investigated and resolved, for reference see case R-007 in page 17 of this document.

- **Allegation: member of Community Affairs staff accused of fraud.**
  - **Company’s actions:** case was already being addressed by the company and was being investigated at the time CONDEG’s note was received. The case was closed with a resolution approved by the complainant.

- **Allegation: payment offer by REPSA’s personnel to people that participated in the September 2015 protest (to get them to engage in the protest) and reluctance of the company to follow through with said offer.**
  - **Company’s actions:** case investigated and cleared out in early 2018, results were shared by the company with CONDEG that same year. For reference see case R-003 in page 6 of this document.

- **Allegation: member of security personnel accused of investigating workers’ representatives (fear of retaliation).**
  - **Company’s actions:** case entered the Grievance Mechanism with number R-008. Results of the verification conducted by an independent third-party showed that this allegation is unfounded. Security personnel is trained regarding human rights and prevention of violence and intimidation on a

**Allegation:** workers selling alcohol and bringing women to their workplace.

**Company’s actions:** case entered the Grievance Mechanism with number R-008. Results of the verification conducted by an independent third-party showed that this allegation is unfounded. However, aware that there is a risk of such a situation, the external consultant issued recommendations to mitigate it. Aligned with this, the company is making efforts to socialize its Code of Conduct with all workers and is currently updating its Disciplinary Manual.

<table>
<thead>
<tr>
<th>R-009</th>
<th>January 01, 2019</th>
<th>Oxfam Guatemala (4 former workers)</th>
<th><strong>Detention of two former supervisors of REPSA during local protest.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td>On January 1, 2019, members of neighboring communities, workers and former workers of REPSA organized a demonstration in Sayaxché to demand more jobs for local people and to express their concerns related to hiring and payment terms.</td>
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<td>Since October 2018, REPSA had been engaging in dialogue with a group of workers to address their concerns in regards to payment terms. A series of meetings were held whereby the company explained the payment of benefits and the payment scheme based on productivity, as well as other terms established in labor contracts.</td>
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<td></td>
<td>4 former workers who had participated in the abovementioned meetings and who resigned in December 2018 *** were informed in January 2019 -when they applied for a work position in the company- that they could not be hired by REPSA because they had engaged in violent activities during the protest of January 1st. In disagreement with the company's decision, these 4 people approached NGOs to ask for their support.</td>
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<td></td>
<td>*** REPSA grants severance payment to all workers that resign at the end of the year and request it. The company also offers them the possibility to apply for positions the next year as longs as these are available. Guatemalan labor legislation does not require companies</td>
</tr>
</tbody>
</table>
to grant severance payment to workers that resign, nevertheless REPSA does this when it is requested by workers as part of an additional benefit.

In August 2019, REPSA was informed that there was a discontent by these 4 people regarding the company's decision. Parallelly, REPSA received comments from other stakeholders in regards to this case, along with the suggestion of looking in depth into the incident and the alleged participation of these 4 former workers.

In October 2019 REPSA commissioned an independent third-party*** to conduct a due diligence on the incident, in order to evaluate the case and be able to take an informed evidence-based decision. For this purpose, interviews were carried out with the victims of the violent incident, the people allegedly involved and others who observed what happened.

*** The external consultant has held positions in governmental institutions in Alta Verapaz and has collaborated in socialization and negotiation processes for private companies in the area. He is fluent in the Q’eqchi language, knows the area and has previously engaged local NGOs, community leaders and other stakeholders.

**ACTIONS TAKEN BY THE COMPANY**

The due diligence process confirmed the following:

- No evidence was found regarding the alleged participation of 2 of the 4 former workers initially held responsible of the violent incident that took place during the protest. Therefore, REPSA shared the results of the due diligence process with them and informed them that they can apply for a job position in the company if they wish to do so. Both persons handed paperwork in order to apply for positions and have recently started working for the company again.

- Results showed that the 2 other former workers did participated in the violent incident that took place during the protest. REPSA informed them of the results of the due diligence process and explained to them that due to their engagement in behavior that contravenes the company’s commitment
to prevent violence and intimidation, they may not apply for job positions in the company.
- These meetings were accompanied by a local representative of the Human Rights Ombudsman’s Office, and REPSA’s Human Resources staff, who was there to address any concern or query these 4 personas may have had regarding their benefits and severance payment.

CONSIDERATIONS

REPSA is respectful of the rights of free association, freedom of expression and freedom of speech of all workers and people in neighboring communities, which is stated in the company’s labor and human rights commitments within its Policy on Responsible and Sustainable Production.

For REPSA, the violent incident that took place during the local protest represents a breach of our Policy on Responsible and Sustainable Production in regards to the commitment to prevent violence and intimidation, as well as our Code of Conduct.

<table>
<thead>
<tr>
<th>R-010</th>
<th>May 2020</th>
<th>Consejo Nacional de Desplazados de Guatemala (CONDEG)</th>
<th>Working hours</th>
<th>Resolved</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>On May 12, 2020, a note was received from CONDEG in which this organization states that there is a difference in the working hours on Saturdays of two plantations compared to the rest of the company's plantations.</td>
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</table>

**ACTIONS TAKEN BY THE COMPANY**

This complaint was registered in the Grievance Mechanism with reference number R-010 and was managed according to the procedure for public grievances ([http://repsa.com.gt/en/descripcion-general/](http://repsa.com.gt/en/descripcion-general/)). On November 15, the company confirmed the admission of this case to the complainant.

The Corporate Committee managed an internal investigation through which isolated cases were found.
Based on the results of the investigation, the company took the following measures:

- As from May 30, 2020, the administration will ensure that working hours on Saturdays are according to what was stipulated in the official minute of a meeting held between management and workers on September 29, 2017.
- The managers of these two plantations were instructed on this and trainings for the administration will be conducted.

### R-011

<table>
<thead>
<tr>
<th>August 23, 2020</th>
<th>Consejo Nacional de Desplazados de Guatemala (Condeg)</th>
<th>Note with workers’ demands and allegations.</th>
<th>Resolved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Working conditions</td>
<td></td>
<td>On August 23rd, 2020 CONDEG handed a note expressing complaints of workers with a piece-rate (quota) contract regarding the productivity goals defined by the company, working hours and how they are being treated.</td>
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</table>

**ACTIONS TAKEN BY THE COMPANY**

Case was filed in the Grievance Mechanism as a public complaint and is being managed through the procedure for allegations of public interest. On August 24 REPSA confirmed the reception of the case to CONDEG.

The Corporate Committee of public complaints analyzed the content of the note and identified the allegations that must be addressed through the Grievance Mechanism, those being:

- **Pressure and mistreatment of workers by their superior.**
- **Working hours and overtime pay.**

The items on the note that need to be explained were also identified, those being:

- **Definition of productivity goals and counting system for payment.**
- **Fruit cutting tests for agricultural workers.**
- **Human Resources communication with Community Councils for Development (COCODEs).**
The Public Grievances Committee managed an internal investigation, and based on its results, the company took the following measures:

- Evaluate the content of staff trainings to address topics that help develop leadership skills and competencies, aligned with the commitment to prevent violence and intimidation within the Policy on Responsible and Sustainable Production.
- Review internal communications regarding productivity goals and the counting system, to identify opportunities for improvement that result in clear and transparent communication.

It was agreed with the Complainant that any inquiries and/or review requests related to salary and payments will be addressed by the company directly with the interested worker, in order to maintain the confidentiality of their private information.

Regarding the company's communication with COCODEs of the area: the company informed COCODEs that a former worker had entered its premises through unauthorized areas, avoiding biosafety protocols and controls.

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<tr>
<th>R-012</th>
<th>October 2020</th>
<th>Consejo Nacional de Desplazados de Guatemala (CONDEG)</th>
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<tbody>
<tr>
<td></td>
<td>Working conditions</td>
<td>Note with workers’ demands and allegations.</td>
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<tr>
<td></td>
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<td>On October 9, 2020 CONDEG sent a note expressing workers’ complaints and discomfort in regards to the way they are being treated, alleged abuses of their superiors, as well as exaggerated productivity goals and pressure.</td>
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<td>ACTIONS TAKEN BY THE COMPANY</td>
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<td>The case was registered in the Grievance Mechanism to be addressed through the public complaints’ procedure. It was analyzed by the Public Complaints Committee.</td>
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<td></td>
<td>Resolved</td>
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</table>
and investigated by the appointed unit. On October 15th, REPSA confirmed the reception of the case to CONDEG.

The allegations that are being addressed in 3 sites are:

- **Pressure and exaggerated productivity goals.**
- **Mistreatment and threats.**
- **Conditions under which workers are crossing the river during rainy season.**

The Public Grievances Committee managed an internal investigation, and based on its results, the company took the following measures:

- An analysis of the productivity goals was conducted, comparing REPSA with the goals of other companies and against official data from the Gremial de Palmicultores (GREPALMA). The results reflected that REPSA's productivity goals are within the industry averages. Nevertheless, steps will be taken to improve communication in this regard.

- Two employees were sanctioned for the violation of the group's Code of Conduct. Sanctions were issued according to the Disciplinary Procedure.

- Employees were surveyed about crossing the river, 100% of those interviewed indicated that they were not forced to cross the river. All interviewees stated that they choose to do so in order to shorten distances.

These results were communicated to CONDEG directly through a phone call held on November 9, 2020.

| R-013 | January 2021 | Consejo Nacional de Desplazados de Guatemala (CONDEG) | **Note with employees’ allegations.**

On January 22, 2021 CONDEG sent a note expressing the complaints and discomfort of a group of employees regarding the way they are being treated by their Foreman. | Resolved |
### ACTIONS TAKEN BY THE COMPANY

The case was registered in the Grievance Mechanism to be addressed through the public complaints' procedure. It was analyzed by the Public Complaints Committee and is currently under investigation. On the 25th of January REPSA confirmed the reception of the case to CONDEG.

The Public Complaints Committee commissioned an internal investigation conducted by a specialized unit independent from REPSA, following the Grievance Mechanism procedure. More than 50% of the employees that report directly to the accused person were interviewed.

Based on the results of the investigation, the Committee decided on the following:

- During the interviews there was no evidence or testimonies that employees are currently uncomfortable with the treatment they receive from the accused person.
- Nevertheless, considering past records and recognizing the right all employees have to a fair treatment, it was decided that the accused person will receive training on leadership.

This complaint also mentioned that the accused person will be occupying a position for which he is not qualified, according to the complainant. As part of the investigation, the file of the accused person was reviewed, and it proved that he meets all the requirements of the position he is currently occupying.

Recognizing the importance of this matter, the group is working on a Strategic Human Rights Plan which will entail a more comprehensive and robust training program for all employees, in order to promote a corporate culture focused on respect for Human Rights.
Mistreatment allegations

On February 04, 2021 CONDEG sent a note expressing the complaints and discomfort of a group of field employees regarding the way they are being treated (abuse and pressure), as well as the exaggerated productivity goals.

**ACTIONS TAKEN BY THE COMPANY**

The case was registered in the Grievance Mechanism to be addressed through the public complaints’ procedure. It was analyzed by the Public Complaints Committee and is currently under investigation. On the 5th of February REPSA confirmed the reception of the case to CONDEG.

The Public Complaints Committee commissioned an internal investigation conducted by a specialized unit independent from REPSA, following the Grievance Mechanism procedure.

The Employee Engagement Unit (independent from REPSA) investigated the case. The interviews conducted did not find any evidence or testimonies on mistreatment by the accused persons, but they did find evidence of strong demands to meet goals, especially during low harvest season.

Recognizing that this is an important topic that we must address in order to prevent complaints and/or abuses, the company will take the following actions:

- A study of times and movements will be carried out to analyze productivity goals.
- The training program will be restructured, and specific training on “respectful treatment” will be included for all positions who have a team under their responsibility. The company is already searching for partners that can support it with this initiative. This training will also strengthen the communication skills of the participants, helping to avoid misunderstandings about the productivity payment so that there is no
misperception that if they do not reach the productivity goal they do not get paid the minimum wage (our system automatically makes the adjustment and ensures that whoever did not reach the established productivity goal gets paid the minimum wage).

Aiming to promote a corporate culture focused on respect for Human Rights, we are working on a Strategic Human Rights Plan which entails due diligence on human rights, a more comprehensive and robust training program for all employees, and a gender program.

<table>
<thead>
<tr>
<th>R-015</th>
<th>May 2021</th>
<th>Consejo Nacional de Desplazados de Guatemala (CONDEG)</th>
<th><strong>Note with employees’ allegations.</strong></th>
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<tbody>
<tr>
<td></td>
<td>Mistreatment allegations</td>
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<td>On May 24, 2021, CONDEG sent a note expressing the discomfort of a group of employees regarding the productivity goals, their working conditions, and the way they are being treated (alleged abuses of technical staff).</td>
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<td><strong>ACTIONS TAKEN BY THE COMPANY</strong></td>
<td><strong>Resolved</strong></td>
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<td><strong>Resolved</strong></td>
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<td></td>
<td>The case was registered in the Grievance Mechanism to be addressed through the public complaints’ procedure. It was analyzed by the Public Complaints Committee and is currently under investigation. On the 28th of May, REPSA confirmed the reception of the case to CONDEG.</td>
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<td>In accordance with the Grievance Mechanism Procedure, the Public Grievances Committee commissioned an internal investigation carried out by an independent unit, as well as an external investigation conducted by an independent consultant.</td>
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<td>Aware of the importance of the topics mentioned in the complaint and the need to address them, the company took the following measures:</td>
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<td>- Provide work card (contract) and related documentation to temporary employees.</td>
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- Strengthen communication to employees about the specificities and benefits of the “piece-rate” work modality; as well as regarding social security.
- Verify communication regarding cut and weight results is given to harvest staff.
- Continue commissioning Intecap to oversee quality of the food menus for employees staying in the housing sites, to ensure healthy, safe and balanced food is provided.
- Based on the Disciplinary Manual of the company, the person accused in the letter was sanctioned, and will be monitored.

<table>
<thead>
<tr>
<th>Date</th>
<th>Action Taken</th>
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<tbody>
<tr>
<td>September 2021</td>
<td>Note with employees’ allegations.</td>
</tr>
<tr>
<td>R-016</td>
<td>On September 19, 2021, CONDEG sent a note expressing the discomfort of a group of employees regarding the productivity goals and the way they are treated (alleged abuses by technical staff).</td>
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</tbody>
</table>

**ACTIONS TAKEN BY THE COMPANY**

The case was registered in the Grievance Mechanism to be addressed through the public complaints' procedure. It was analyzed by the Public Complaints Committee and is currently under investigation. On the 20th of September, REPSA confirmed the reception of the case to CONDEG.

In accordance with the Grievance Mechanism Procedure, the Public Grievances Committee commissioned an internal investigation carried out by an independent consultant.

Based on the results of the investigation, the following measures were taken:

- Based on the Disciplinary Manual of the company, the 2 persons mentioned in the complaint were sanctioned, and will be monitored.
- Official communication was sent to the REPSA’s Management to ensure internal transportation is always provided by safe means (buses).
Aware of the importance of the topics mentioned in the complaint and the need to address them, the company is carrying out the following initiatives:
- Technical study conducted by an external expert to evaluate productivity goals (starting 2022).
- Pilot program to promote “leadership with respect” among plantation leaders (starting Q1-2022).

| R-017 | February 2022 | Consejo Nacional de Desplazados de Guatemala (CONDEG) | **Note with employees’ allegations.**

On February 2nd, 2022, CONDEG sent a note expressing the concerns of some employees regarding discounts on their salaries due to the payment of the municipal tax and about the information included in the pay slips.

**ACTIONS TAKEN BY THE COMPANY**

The case was analyzed by the Public Complaints Committee and admitted to the Grievance Mechanism to be addressed through the public complaints’ procedure. On February 2nd, REPSA confirmed the reception of the case to CONDEG.

In accordance with the Grievance Mechanism Procedure, the Public Grievances Committee commissioned a verification of the matters addressed in the note.

Based on the results of the investigation, the following measures were taken:

**Municipal tax**

According to Decree 121-96 of Guatemala, every year companies have the obligation to require their employees to present their municipal tax tickets, which must be paid according to the salary earned. If the tax ticket is not presented to the employer, companies must deduct it from the employee’s salary in the January or February at the latest.

According to the amounts stipulated by Guatemalan regulations on this matter, employees who earn salaries of Q3,001 and up must pay the municipal tax with the value of Q50.00.

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<tr>
<td><strong>Resolved</strong></td>
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</table>
- In February 2022, there were 270 employees who presented tax tickets for Q10.00 or other smaller amounts than what they should have paid based on their salaries. Therefore, the company proceeded according to Decree 121-96 and deducted the difference between the ticket they paid and the one they were supposed to pay from their salary.
- There were 27 workers who did not present the tax ticket and following Decree 121-96, the full value of the municipal tax was deducted from their salary.
- No employee was subject to any different or higher deduction than what the Guatemalan regulation establishes that must be paid as municipal tax by employees according to their salary.

Minimum wage

REPSA’s payroll system was aligned to the new Guatemalan minimum wage since it was approved by the government in December 2021.

The specific case addressed in the note was reviewed, as well as a sample of other pay slips.

- In the case in question, the minimum wage was calculated on the liquid salary; however, the minimum wage must be calculated on the total salary (before deductions) and not on the liquid salary.
- The pay slip of the case belongs to an employee with a daily salary (not monthly) who is paid every 14 days; therefore, the salary must be calculated based on the 14-day daily salary that includes 2 paid days off and the incentive bonus.
- Through the documents assessed, it was possible to verify that REPSA is paying the current minimum wage, in compliance with the terms established in the working contracts for employees with a daily salary.
Recognizing the importance of the issues raised in the note, the following actions were carried out:

- Communication with employees will be improved and they will be urged to raise their queries through the Grievance Mechanism; in order to prevent confusion regarding employees’ payment of the municipal tax and the obligations of companies according to Decree 121-96.

- The new pay slips, effective as of February 2022, have much more detailed information that will help clear employees concerns about payment details. The new version includes the name of the hiring company (REPSA), the detail of the salary earned (total and liquid), breakdown by days worked, payment of overtime and detail of deductions (social security). The new version of the pay slip is being explained to employees.
### Others

<table>
<thead>
<tr>
<th>No.</th>
<th>Date and Subject</th>
<th>Stakeholder (s)</th>
<th>Allegation and progress</th>
<th>Status</th>
</tr>
</thead>
</table>
| R-002 | 18-April-2017    | NGO Coalition (see above)                | **Professor Rigoberto Lima Choc.**  
In September 2015, Professor Rigoberto Lima Choc was murdered. Some organizations and local people accused REPSA of committing this crime, linking his murder to his public declarations on the case of La Pasion River.  
In 2017 Prosecutor’s Office (MP in Spanish) arrested two for the murder of Rigoberto Lima Choc, who were later found guilty and sentenced to prison.  
On August 29, 2018, REPSA requested the Prosecutor’s Office to inform if REPSA was or is being investigated for this case and if there is any accusation against the company regarding said case.  
On October 26, 2018 Prosecutor’s Office handed REPSA a letter stating the following:  
- This entity (referring to REPSA) was considered as possible responsible at the beginning of the investigation, however, the investigation determined that those responsible were others, so the research was carried out focused on other people.  
- Such entity (referring to REPSA) was not and is not currently being accused of this crime.  
  
Grievance List

Last updated April 2022

A. Cases in process

** There are no cases in process.

B. Resolved cases

** No complaints of public interest have been registered.
Grievance List

_Last updated April 2022_

**A. Cases in process**

There are no cases in process.

**B. Resolved cases**

<table>
<thead>
<tr>
<th>No.</th>
<th>Date and subject</th>
<th>Stakeholder</th>
<th>Allegation and progress</th>
<th>Status</th>
</tr>
</thead>
</table>
| ET-001 | November 2021          | Article published in digital media | Grupo HAME was recently mentioned in a media article that highlights situations related to the company and its processes, showing inconsistencies. We are committed to sustainability and focused on continuous improvement, so with transparency we inform you:  

- El Retiro is a palm oil plantation located in Coatepeque in the south of the Department of Quetzaltenango in Guatemala, a region known as the “lowlands of the southwest of the country”, an area prone to floodings during the winter season due to the orographic conditions of the territory. | Addressed |
- As part of El Retiro there is a private area with a system of topographic depressions known as “Pampa Guamuchal”. In this region, areas that can be flooded during winter season are commonly known as “pampas”. Since they are intermittent, these are not recognized as bodies of water\(^2\).

- In 2012 Palmas del Horizonte S.A. (PAHOSA), a company part of Grupo HAME, acquired El Retiro, where Pampa Guamuchal is located. To prevent palm oil plantations in the site from flooding during winter, the company began implementing soil conservation actions with the construction of hydraulic infrastructures to control the conduction of water that accumulates during winter inside the plantation.

- In 2014, PAHOSA received notice of an administrative sanction for not conducting the required environmental evaluations for the hydraulic infrastructure works carried out in El Retiro. The company complied with the mandate by paying the fine established by the competent governmental entity and began to work on the environmental requirements.

- PAHOSA has a legal process in the Public Ministry of Guatemala (MP) due to a complaint filed by the Ministry of Environment and Natural Resources (MARN) in 2015 based on allegations of local community organizations who accused PAHOSA of “wrongful possession of water”. The case is currently under investigation in the MP. At Grupo HAME we are respectful of the law and due process, therefore we comply with the official dispositions, and have cooperated with the authorities since the beginning of this process and will continue to do so as required until its resolution.

In 2019, Grupo HAME signed the Voluntary Commitment to Zero Deforestation led by Grepalma (https://grupohame.com/gestion-ambiental/). In 2020 the "Satellite monitoring for the sustainable development of palm oil production in Guatemala" was carried out by the independent company Satelligence (https://satelligence.com/), based on, temporal analysis of satellite images of optical and radar sensors for the period of 1989-2020. Currently, 100% of our plantations and those of our third-party suppliers are being monitored by satellite to ensure compliance with the zero-deforestation commitment. We share the results of this monitoring through reports published on our website (https://grupohame.com/trazabilidad/).

Since 2019, Grupo HAME’s palm oil plantations and mill in Coatepeque, Quetzaltenango, operate under the legal name of El Triunfo, S.A. We publish all relevant information on our websites (www.grupohame.com; www.eltriunfo.com.gt) regarding to who we are, what we do and the company’s social and environmental performance. El Triunfo is registered in the Universal Mill List (UML) of Global Forest Watch with the code PO1000007504.

Since 2018 Grupo HAME has a Sustainability Policy (updated version 2021: https://grupohame.com/vision-sostenibilidad/) that reiterates our commitments in terms of governance, human rights, and the environment. This policy applies to all our companies, operations, suppliers, and business partners.

As part of our commitment to ensure an efficient, rational and responsible use of water and in the absence of a national regulation, we are leading members of 7 Watershed Committees in our areas of influence. These committees are conformed by the Private Institute for Climate Change Research (ICC), government authorities and institutions, civil society organizations, community leaders and private companies in the area, with the purpose of regulating the consumption of water by all users to ensure the supply of this resource in quality and quantity to communities and companies. In addition, we implement the best
agricultural and environmental practices related to the responsible use of water, such as rainwater harvest, reuse of treated palm oil mill effluent (POME) in fertigation and are currently working on a Comprehensive Water Management Program accompanied by experts on the subject.

- Committed to transparency, we have an open-door policy, where information on our plans and progress is published periodically on our website (www.grupohame.com). In addition, we have a Grievance Mechanism, confidential, safe, and free of charge that any person or stakeholder can use to submit their complaints in relation to the company’s processes, so that they can be addresses. Toll-free line 1801-13-77777, email: quejasyconsultas@grupohame.com.

- At Grupo HAME, we reaffirm our commitment to continue contributing to the social, environmental, and economic development of the country, reason why we invite all stakeholders to visit us in person and learn more about us and our performance (contactenos@grupohame.com).
Grievance List

*Last updated April 2022*

**A. Cases in process**

**There are no cases in process.**

**B. Resolved cases**

**No complaints of public interest have been registered.**