

	LAND ACQUISITION	0200-001-01E
	LAND	CHIEF COUNTRY OFFICER

## OBJECTIVE

This document delineates Forest First Colombia S.A.S. (FFC) Policy on land rights acquisition for all its operations to ensure that only suitable and legally transferable land rights are acquired.

## POLICY

FFC manages land rights acquisition within its Environmental and Social Management systems, and according to IFC and FSC requirements.

FFC manages all land rights acquired in line with the legislative requirements in the Republic of Colombia. FFC obtains the necessary permits, consents and licenses required in its forestry and processing operations as required by Colombian regulatory frameworks to ensure operations taking place on the land are undertaken lawfully.

FFC will not manage land rights or undertake any activities on land that has not been fully titled and is not under private ownership. We assess every land rights acquisition individually to ensure that in securing land rights we do not cause physical and economic displacement or to undertake risk mitigation actions.

FFC guarantees that we will not seek to secure land rights on properties that are immersed in administrative processes of restitution of lands, that are located on the legally recognized reserves of indigenous people, that have mining titles, zones of exploitation or exploration of hydrocarbons, nor that have restrictions regarding land use or any environmental bans. We will not seek to secure land rights on any property that has indigenous people settlements, or any minority group protected under Colombian law.

FFC undertakes a social, environmental, technical, and legal risk assessment on land parcels prior to securing land rights. The objectives of conducting a risk assessment review for land rights acquisition are:

1. Ensure the title was properly acquired, is legal and valid.
2. Ensure the parcel of land is suitable for forestry activities and determine its plantable areas.
3. Ensure the parcel of land is free from cultural heritage sites, invasions and/or illegal occupiers, and that there are no additional claims to that parcel of land.
4. Ensure the parcel of land is free from indigenous people occupation and that there are no traditional or customary rights or uses;
5. Ensure the property is not in a protected area or other restricted areas;
6. Identify sensitive environmental areas for set asides, exclusion and future conservation areas (e.g. wetlands, riperian, gallery forest, etc.);
7. Identify local community cultural heritage sites to allow preservation and free access to these sites; and

Developed by: C. Botero	Approved by: T. Pachon	Version No. 03	Review Date: 09/2020
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8. Avoid forced eviction and displacement of people (including economic displacement).

In order to accomplish these objectives, FFC engages with the landowner to solicit all relevant documentation for the analysis of the title to develop a legal due diligence report which incorporates relevant technical, environmental and social data identified through a risk assessment.

FFC will not acquire land rights from an owner who has any criminal record and will verify his/her disciplinary or fiscal records through consultation of publicly available information on several databases, including the National Police, Comptroller General of the Republic of Colombia, Attorney General's Office and Clinton List.

Every land right acquisition starts in good faith and on the principle of "willing-buyer, willing-seller" which recognized the voluntary intention of the owners to sell his or her land rights. Under no circumstances will negotiations continue if there was coercion by some person (internal or external) to carry out the sale.

FFC respects easements or passageways, even when they are not legally constituted, in order to avoid affecting the rights of way or transit of the population that makes use of them. However, at the time of plantation and compartment layout, we will be optimizing access and extraction routes. If, in optimizing access and extraction routes, we find it necessary, we will move or relocate existing easements or passageways to maintain, as much as possible, the population's ability to transit.

We will not acquire land rights on properties:

- that are pending or are involved in succession processes,
- That are subject to restrictions that were identified during the consultation process with government entities,
- where there was any possible violation of rights to individuals or communities in the surrounding population,
- From which there was Involuntary relocation of already established indigenous communities even if they are not officially recognized by the Colombian government, and
- If the acquisition would affect ancestral rights of any indigenous community.

In those instances where the landowner has a caretaker on the property and the caretaker is not suited or interested in continuing a relationship with FFC, we will ensure that the caretaker's relationship with the landowner and the property is properly and formally terminated, and if necessary we support the caretaker's transition to his/her next activity

As a forestry operation, FFC manages critical issues of public concern such as fauna and flora species conservation and cultural heritage site preservation. FFC also monitors potential adverse impacts from its forestry operations such as ecosystem transformation and/or water pollution.

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Prior to the acquisition of land rights, FFC obtains a title study from an external law firm in addition to our own internal document to ensure that the acquisition process was transparent and to validate our title studies. All financial agreements concluded between the selling landowner and FFC are documented through the Land Term Sheet. All land rights acquisitions are evidenced through commercial trust and usufruct contracts, which are registered as public deeds in the relevant registrar's office.

Communities affected or dissatisfied about some aspect of the land right acquisition process may use the grievance mechanism established by FFC and use those communication channels to submit their complaints and concerns.

FFC will review its land acquisition policy every three years or more frequently if deemed necessary.

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