LAC - Action Plan

July 2024



| ALLEGATIONS | ACTIONS | TIMEFRAME | CURRENT STATUS |
|--|---|----------------------|-------------------|
| | Develop SOP for community engagement that respects FPIC principles | December 2024 | Ongoing |
| | Develop participatory mapping SOP and implement | December 2024 | Ongoing |
| 1. Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003 | Develop a comprehensive work plan for the implementation of the stakeholder engagement strategy. | March 2025 | To start |
| | Update existing program for LAC's support for education, taking into account community needs. Clarify LAC's role and communicate to communities. | April 2025 | To start |
| | Update the external grievance management process: SOP, sensitizations with communities, implementation with trackers ensuring the capture of the status and follow up of all grievances up to resolution. | October 2024 | Ongoing |
| | Establish MOUs with communities documenting what has been agreed and how agreements will be implemented. | September 2024 | Ongoing |
| 2. Physical relocation | If further expansion is planned, develop relocation plan according to international requirements and implement in case of any future development. | No plan to expand | Not applicable |
| 3. Destruction of Sacred sites and grave yard | Finalize the process of graves / graveyards identification and set up a management plan with communities (activities, roles, responsibility, monitoring). Get a written document signed by the communities. | April 2025 | Ongoing |

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|--|---|--|-------------------|
| 4. Compensation is either insufficient or not existing | Compile summary of all who were entitled to compensation from LAC and the government. | December 2024 | To start |
| | Compile summary of all who have received crop compensation . | December 2024 | To start |
| | Engage the government (through National Bureau of Concession for example) to assess pending payment / compensation options (deduction of taxes, etc.). | Depending on Government response | To start |
| | Once the government has completed the assessment of pending payment/compensation options, engage the communities in collaboration with the government and local CSOs to validate and pay pending government compensation. | Depending on Government response | To start |

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|---|---|---------------|--|
| 5. Sexual harassment and Gender – based violence | Develop and implement policies on sexual harassment and gender-based violence that covers all levels of workers, including long-term and short-term workers. | December 2024 | Started with various levels. Short term workers remain |
| | Develop safe and confidential reporting mechanisms for workers to report incidents of sexual harassment or gender-based violence and ensure that there are sufficient resources available to investigate and respond to complaints. | December 2024 | To start |
| | Provide regular awareness and training for all employees, contractors, and contract workers on the sexual harassment policy and procedures for reporting incidents of sexual harassment and gender-based violence. | Continuous | Ongoing |
| | Provide all necessary logistical support to the Gender Committee to enable them to reach and cover effectively all workers 'villages and schools within the plantations & LAC. | June 2025 | Ongoing |
| | Establish a hotline for reporting sexual harassment | June 2024 | Done |
| | Put in place pictorial communication warning signs within the plantation that indicate zero tolerance of sexual harassment and corruption. | August 2024 | To start |

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| 6. Reprisals, Threats, and Intimidation of activists | Discuss with communities' representatives the best ways to handle common security incidents, especially rubber theft and cup theft. | December 2024 | To start |
| | Share information with communities on law related to penalties for rubber theft- PSU will be involved with Cluster community leadership to disseminate information about laws. | December 2024 | To start |
| | Carry out training on Human Rights and no intimidation for LNP operating in LAC's premises and for LAC security guards | Continuous | To start |

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|-----------------------------|--|---------------|-------------------|
| 7. Restriction of movement | Develop and implement policy on restriction/regulation of movement, train security guards on the policy. | July 2024 | In progress |
| | Conduct further investigations with towns related to requests for bribes from security guards, in order to set up a participatory approach to settle disputes. | December 2024 | To start |
| | Carry out awareness-raising with communities on the policy Radio awareness already being done | December 2024 | In progress |
| 8. Access to drinking water | Improve renovation and construction of hand pump by hiring qualified companies | Continuous | Ongoing |
| | Put in place a monitoring system for hand pumps and implement. Train community dwellers to handle and trouble shoot minor repairs | Continuous | Ongoing |
| | Assess communities' drinking sources and establish a phased priority program to provide safe drinking water for communities | Continuous | Ongoing |
| | Improve renovation and construction of hand pump by hiring qualified companies | Continuous | Ongoing |

| ALLEGATIONS | ACTIONS | TIMEFRAME | CURRENT STATUS |
|---|---|------------|-------------------|
| 9. Poor Employment conditions, work safety and labor rights violations of subcontracted workers | Document workers' community of origin and give priority and preference to surrounding communities. | Continuous | Ongoing |
| | Document all workers irrespective of contracts or jobs. | Continuous | Ongoing |
| | Ensure all workers irrespective of the type of contract are paid at least the minimum wage in accordance with the Decent Work Act of 2015. | Continuous | Ongoing |
| | Supply tools and PPE to all workers free of charge and monitor their use | Continuous | Ongoing |
| | Reinforce the monitoring system of subcontractors with regular inspections of their operations to ensure that the responsible management policy is being implemented-Radio jingles, awareness meeting with contractor heads | Continuous | Ongoing |

| ALLEGATIONS | ACTIONS | TIMEFRAME | CURRENT STATUS |
|---|---|-------------------------------|-------------------|
| 10. Abuse from middlemen purchasing from smallholders | Develop and implement a comprehensive smallholder strategy and approach that includes SOPs and policies for how middlemen deal with smallholders. | September 2024 | Ongoing |
| | Conduct investigations into all bribes reported against agents, security guards and Quality Assurance team and take appropriate disciplinary action | Continuous | Ongoing |
| 11. Food insecurity | Finalize participatory mapping with communities to assess whether or not they have sufficient farmland. | March 2025 | Ongoing |
| | Conduct a food security assessment and design, implement, and monitor a food security strategy based on its results. | December 2024 / continuous | To start |

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