

## **Socfin Group - Sexual harassment and violence action plan**

### **1. Scope**

This action plan applies to all operations. While Group-wide in intent, implementation will be prioritized in higher-risk sites to ensure targeted impact, efficient use of resources and to bring results where they are most needed.

### **2. Objectives**

- 2.1 Prevent sexual harassment and aggressions across all operations.
- 2.2 Promote a respectful, inclusive, and gender-sensitive workplace culture.
- 2.3 Empower employees to speak up safely and confidentially.
- 2.4 Establish clear and culturally sensitive response and accountability mechanisms.
- 2.5 Identify gaps in the effectiveness of existing mechanisms and take corrective actions to ensure they achieve their intended outcomes.

### **3. Corporate governance and support**

- 3.1 Have a dedicated group-level Focal Point/Team, reporting to the Oversight Committee to coordinate, monitor, report on and drive implementation of this action plan across all sites. **By June 2025.**
- 3.2 Provide comprehensive and specialized training to the Focal Point. **By September 2025.**
- 3.3 Explore the potential added value of partnering with global expert organizations specialized in GBVH (Gender-Based Violence and Harassment) that could support the Company at corporate level. **By October 2025.**

### **4. Policy**

- 4.1 Finalize, release and implement a “Socfin Group sexual harassment policy” signed by Socfin Board Members with a zero-tolerance statement on sexual harassment. **By July 2025.**
- 4.2 Communication of the policy by the Socfin Board Members to all the operating subsidiaries’ General Managers in Africa and Asia. **By July 2025.**
- 4.3 All operating subsidiaries’ General Managers in Africa and Asia to ensure a wide communication to all their employees, contractors, suppliers and neighboring communities. **By August 2025.**

### **5. Reporting cases of sexual harassment**

- 5.1 Ensure accountability for perpetrators with disciplinary actions in line with local legal framework. **By July 2025.**
- 5.2 Ensure the confidentiality and security of information and actors involved in the processing of complaints related to gender issues. **By August 2025.**

- 5.3 Formalize a Socfin Group procedure for handling cases of gender-based violence (reporting, investigation, disciplinary measures for offenders, follow-up, etc.). **By October 2025.**
- 5.4 Ensure that all cases logged through these mechanisms are immediately transmitted to the Group level (Focal Point). **By October 2025.**
- 5.5 Ensure that there are sufficient resources available to investigate and respond to complaints. **By October 2025.**
- 5.6 Improvement of safe and confidential reporting mechanisms for workers to report incidents of sexual harassment or gender-based violence through the use of a dedicated external platform; review of the effectiveness of the existing dedicated hotlines, local or at Group level and do changes as necessary. **By November 2025.**
- 5.7 Develop and implement a protocol to support victims of gender-based violence. **By December 2025.**

## 6. Gender Committees

- 6.1 Update the Gender Committee's terms of reference and organogram with clear description of roles and responsibilities. **By September 2025.**
- 6.2 Clarify and document the selection criteria and method of appointing members of the Gender Committee in place. **By September 2025**
- 6.3 Promote inclusivity within the Gender Committee by including a representative for each department, contractors, security companies and communities. **By September 2025.**
- 6.4 Identify training needs to build capacity of the Gender Committee with external expert support (training of committee members, terms of reference, complaint management). **By November 2025.**
- 6.5 Ensure a direct link between the Gender Committee and the subsidiaries' Top Management. **By June 2025.**
- 6.6 Improve the Gender Committee's accessibility to report cases. **By October 2025.**
- 6.7 Exploring possible partnership with local independent women NGOs to be part of the Gender Committee meetings. **By November 2025.**
- 6.8 Formalize the various means/supports and frequency of communications relating to the Gender Committee. **By November 2025.**
- 6.9 Identify where resources might be lacking for the Gender Committees to fully deliver on their mission and provide all necessary logistical support to enable them to reach and cover effectively all workers' villages. **By October 2025.**
- 6.10 Ensure the Gender Committees capture neighboring communities' issues. **By December 2025.**

## 7. Training

- 7.1 Formalize and monitor annual training plans on sexual harassment policy and related documents with statistics on trainings records: department, staff, workers categories, contractors, communities. **By January 2026.**

- 7.2 Provide regular awareness and training for all employees, contractors, contract workers, suppliers and community members on the sexual harassment policy, the procedures for reporting incidents of sexual harassment and gender-based violence and the Gender Committees (their members, their roles, activities and responsibilities). **By January 2026 and continuous.**
- 7.3 Ensure pictorial communication warning signs within the plantation that indicate the zero tolerance of sexual harassment, the reporting channels and the clear disciplinary process. **By August 2025.**
- 7.4 Exploring possible partnership with local independent women NGOs to carry out a series of focus group discussions and workshop with women workers and in neighboring communities on sexual harassment. **By November 2025.**
- 7.5 Assess the impact of the training to verify the efficiency of the communication on sexual harassment, Gender Committee, hotline and grievance mechanism. **By February 2026.**

## 8. Contractors

- 8.1 Conduct an assessment of the current use of contractors for each site in order to evaluate how and come up with a time-bound plan to gradually limit their use to seasonal and non-core activities. **By February 2026.**
- 8.2 Review the hiring process by contractors to prevent requests for indecent favors such as exchanging sexual favors for jobs. **By October 2025.**
- 8.3 Conduct a review to assess whether the Code of Ethics are currently being communicated to and acknowledged formally by all contractors. **By January 2026.**
  - Based on findings, ensure a standardized process is in place across all sites to systematically communicate these policies and obtain signed acknowledgment. **By March 2026.**
- 8.4 Review contractual obligations (including sanctions) for all contractors to include mentions upholding ethical recruitment standards, with zero tolerance for harassment or abuse. **By February 2026.**
- 8.5 Identify monitoring mechanisms that could be implemented – such as spot checks, having an employee attributed to teams of contractors, or audits – to ensure compliance of contractors. **By February 2026.**

## 9. Recruitment

- 9.1 Review existing recruitment procedures and strengthen them if needed to ensure safeguards are in place to prevent abuse or exploitation during the hiring process. **By March 2026.**

## 10. Management and supervision

- 10.1 Increase the representation of women in management's positions. **Continuous.**

- 10.2 Increase the representation of women in team leaders' positions.  
**Continuous.**

## **11. Workers villages**

- 11.1 Ensure housing allocation for workers follows a defined protocol with allocation decision taken by a committee and not a single person. **By December 2025.**
- 11.2 Develop living protocols for all workers living in the company workers' villages describing the rules of living together, the offences, the zero tolerance on sexual harassment and the disciplinary measures associated with confirmed cases. **By December 2025.**
- 11.3 Document all protocols signed by workers and track any issues raised inside the workers villages. **By February 2026 and continuous.**

## **Milestones and KPIs to track implementation of the plan through the following topics**

- 1. Policy**
  - 1.1. Validation by Socfin Board Members
  - 1.2. Communication to all GMs
  - 1.3. Communication to all subsidiaries' key stakeholders
- 2. Procedure**
  - 2.1. Procedure validated
  - 2.2. Communication to all GMs
  - 2.3. Communication to all subsidiaries' key stakeholders
- 3. Communication**
  - 3.1. Communication of policy and procedure, see above
  - 3.2. Assessment of communication impact
- 4. Gender Committees (number, composition, skills, activities)**
  - 4.1. Terms of reference (selection criteria, appointment method for committees' members, description of roles & responsibilities)
  - 4.2. Organogram
  - 4.3. Confirmation of inclusivity
  - 4.4. Existence of direct link between gender committees and subsidiaries' Top Management
  - 4.5. Confirmation of Gender Committees' accessibility to report cases
  - 4.6. Partnership with local NGOs to be part of Gender Committees' meetings
  - 4.7. Resources availability and logistical support
  - 4.8. Capture of neighboring communities' issues
- 5. Training**
  - 5.1. Annual training plans
  - 5.2. Monitoring of annual training plans
  - 5.3. Pictorial communication zero tolerance
  - 5.4. Partnership with local NGOs to deliver awareness sessions in subsidiaries and local communities
  - 5.5. Assessment of training impact

- 6. Cases reported**
  - 6.1. Cases reported through grievance mechanism and Socfin hotline
  - 6.2. Cases reported through Gender Committees
  - 6.3. Cases reported communicated to the Top Management
- 7. Cases investigated**
  - 7.1. Cases investigated by the Gender Committees
  - 7.2. Cases investigated by other investigating teams
  - 7.3. Ratio of cases investigated/cases reported
- 8. Disciplinary actions taken**
  - 8.1. Register of disciplinary actions recorded
  - 8.2. Type of disciplinary action
  - 8.3. Ratio of disciplinary action/cases investigated
- 9. Breakdown of workforce (employees/contractors)**
- 10. Time-bound plan to gradually limit the use of contractors to seasonal and non-core activities**
- 11. Follow up of contract duration for contractors**
  - 11.1. Register of contractors with dates
  - 11.2. List of contractors' workers and details
- 12. Contractors' hiring protocol**
  - 12.1. Contractors' hiring protocol revised
  - 12.2. Revised hiring protocol communicated to contractors
  - 12.3. Code of ethics communicated to contractors
  - 12.4. Policies communicated to contractors
  - 12.5. Checks that contractors comply with hiring protocol
- 13. Women in management position**
- 14. Women in team-leaders position**
- 15. Housing**
  - 15.1. Register of occupants per workers' village
  - 15.2. Protocol of housing allocation
  - 15.3. Protocol of living in the workers' villages
  - 15.4. List of roles and responsibilities per workers' villages
  - 15.5. Assessment of compliance' level to protocol by occupant
- 16. High-level monthly report to Oversight Committee**

June 2025