

LAC Action Plan

UPDATE JUNE 2025



LAC – ACTION PLAN – JUNE 2025

ALLEGATIONS	ACTIONS	STATUS & IMPLEMENTATION			TIMEFRAME		
		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY
Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003	Develop SOP* for community engagement that respects FPIC** principles.	Done	1. SOP for community engagement that respects FPIC principles has been developed.	1. Ongoing communication on this SOP to communities.	Dec. 2024	/	/
	Develop participatory mapping SOP and implement.	Done	1. SOP for participatory mapping has been developed. 2. Implementation of the procedure through the realization of participatory mapping with communities.	1. Inclusion of a chapter on participatory mapping in the community meeting agenda.	Dec. 2024	/	/
	Develop a comprehensive work plan for the implementation of the stakeholder engagement strategy.	Started	1. LAC has updated its stakeholder engagement strategy including a work plan for its implementation. 2. LAC has developed external reports on community activities.	1. Implementation of the stakeholder engagement plan.	Mar. 2025	Dec. 2025	Time necessary for communities' engagement underestimated.

* SOP: Standard Operating Procedure

** FPIC: Free, prior and informed consent

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Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003	Update existing program for LAC's support for education, taking into account community needs. Clarify LAC's role and communicate to communities.	Done	<ol style="list-style-type: none"> 1. LAC has updated its existing education support program to take into account community needs: example of Zondo Public School. 2. The role of LAC in the process of education supporting program has been clarified and communicated through community meetings. 	<ol style="list-style-type: none"> 1. Continuous communication with communities. 	Apr. 2025	/	/
	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.	Started	<ol style="list-style-type: none"> 1. To ensure the efficiency of its communication, LAC has collected the lists of community leaders for all communities. 2. SOP on external grievance management will be updated. 3. Revised SOP will be communicated to communities through awareness programs and information displayed on notices boards. 4. The tracking system will be updated to ensure the capture of the status and follow-up of grievances up to resolution. 	<ol style="list-style-type: none"> 1. Implementation of the updated grievance mechanisms with assessment on its efficient usage. 	Oct. 2024	Aug. 2025	Time necessary for communities' engagement underestimated.

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Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003	Establish MoUs* with communities documenting what has been agreed and how agreements will be implemented.	Started	1. Establish MoUs with communities documenting what has been agreed and how agreements will be implemented.	1. Follow-up of the implementation of the MoUs.	Sep. 2024	Aug. 2025	Time necessary for communities' engagement underestimated.

* MoU: Memorandum of understanding (MOU)

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Physical relocation	If further expansion is planned, develop relocation plan according to international requirements and implement in case of any future development.	Done	1. LAC has no plan for expansion.	/	/	/	/

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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.	Done	<ol style="list-style-type: none"> SOP for participatory mapping has been developed with management plan including activities, roles, responsibility and monitoring. LAC has finalized the process of graves/graveyards identification in April 2025. 	<ol style="list-style-type: none"> Inclusion of a chapter on Participatory Mapping in the community meeting agenda. Establishment of MoU with communities with details on agreements and their implementation. 	Apr. 2025	/	/

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Compensation is either insufficient or not existing	Compile summary of all who were entitled to compensation from LAC and the government.	Started	1. The compilation of the summary of persons entitled to compensation from LAC and government is in progress.	/	Dec. 2024	Jul. 2025	Time necessary for communities' engagement underestimated.
	Compile summary of all who have received crop compensation.	Started	1. The compilation of the summary of persons who have received crop compensation is in progress.	/	Dec. 2024	Jul. 2025	Time necessary for communities' engagement underestimated.
	Engage the government (through National Bureau of Concession for example) to assess pending payment / compensation options (deduction of taxes, etc.).	Done	1. LAC has engaged the government through the Ministry of Agriculture with reference to the assessment of crop compensation payment.	1. Continuous engagement with government on this matter.	Depending on Government Response	/	Engagement ongoing awaiting confirmation from government.

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Compensation is either insufficient or not existing	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.	Started	<ol style="list-style-type: none"> Engagement with the government is ongoing to progress on the assessment of pending payment/compensation options. Evidence of letters and meeting records between LAC and the government are available. 	<ol style="list-style-type: none"> Continuous engagement with government on this matter. 	Depending on Government Response	/	Engagement ongoing awaiting confirmation from government.

* CSO: Civil Society Organisation

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		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY
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.	Done	<ol style="list-style-type: none"> LAC has developped policies on sexual harassment and gender-based violence that covers all levels of workers, including long-term and short-term workers. Training and awareness programs have been organized on these policies to ensure they are understood and respected. 	<ol style="list-style-type: none"> Inclusion of a chapter on sexual harassment in the community meeting agenda. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	Dec. 2024	/	/
	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.	Done	<ol style="list-style-type: none"> LAC has developped a hotline which is a safe and confidential reporting mechanisms to report incidents of sexual harassment or gender-based violence. Additional ressources have been allocated to investigate and respond to complaints. 	<ol style="list-style-type: none"> Use of the hotline. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	Dec. 2024	/	/

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Sexual harassment and gender-based violence	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	<ol style="list-style-type: none"> 1. Training and awareness programs have been provided to employees, contractors and contract workers on the sexual harassment policies and procedures. 2. Annual training plan includes sexual harassment training to ensure ongoing communication and awareness. 3. A description of the sexual harassment and gender policies have been included in the induction program for all new employee and contractors. 	<ol style="list-style-type: none"> 1. Inclusion of the Sexual Harassment and Gender Committee Policy in the training plan 2025. 2. Commitment and implementation of the “Socfin Group Sexual Harassment and Violence Action Plan”. 	Continuous	/	/

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Sexual harassment and gender-based violence	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.	Continuous	<ol style="list-style-type: none"> 1. LAC ensures logistic support to the Gender Committee. 2. LAC has organized a workshop on Sexual Harassment to cover effectively all workers' village. 3. LAC is providing logistic supports to the Gender Committee to ensure their presence among communities. 	<ol style="list-style-type: none"> 1. Gender Committee improvement with representatives in department and villages. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	Jun. 2025	Continuous	/
	Establish a hotline for reporting sexual harassment.	Done	<ol style="list-style-type: none"> 1. LAC has established a hotline for reporting sexual harassment and other confidential claims. 2. Trainings on this hotline have been organized to various areas. 	<ol style="list-style-type: none"> 1. Inspection on the use of this hotline is ongoing. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	Jun. 2024	/	/
	Put in place pictorial communication warning signs within the plantation that indicate zero tolerance of sexual harassment and corruption.	Done	<ol style="list-style-type: none"> 1. LAC has displayed pictorial communication warning signs within the plantation indicating zero tolerance of sexual harassment and corruption. 	<ol style="list-style-type: none"> 1. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	Aug. 2024	Jun. 2025	Pictorial communication warning signs have been prepared. Display and sensitization in progress.

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Reprisals, threats, and intimidation of activists	Discuss with communities' representatives the best ways to handle common security incidents, especially rubber theft and cup theft.	Continuous	<ol style="list-style-type: none"> To ensure the efficiency of its communication, LAC has verified the lists of communities' representatives for all communities. Discussions on handling methodology for common security incident is integrated during community meeting agenda. 	<ol style="list-style-type: none"> Continue to monitor the methodology of handling common security incidents and adapt as needed. 	Dec. 2024	Continuous	/
	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.	Continuous	<ol style="list-style-type: none"> LAC has updated its community meetings form to include a chapter on law related to penalties for rubber theft. PSU have been involved with Cluster community leadership to disseminate information about laws. 	<ol style="list-style-type: none"> Continuous communication sharing with communities with the revised community meeting form. 	Dec. 2024	Continuous	/
	Carry out training on human rights and no intimidation for LNP** operating in LAC's premises and for LAC security guards.	Continuous	<ol style="list-style-type: none"> Training and awareness programs on human rights and no intimidation for LNP have been conducted in November 2024 and January 2025. 	<ol style="list-style-type: none"> Monitor the effectiveness of the trainings. 	Continuous	/	/

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Restriction of movement	Develop and implement policy on restriction/regulation of movement, train security guards on the policy.	Continuous	<ol style="list-style-type: none"> 1. LAC has developped and implemented a policy on restriction/regulation of movement. 2. Trainings to security guards on the policy have been organized. 	<ol style="list-style-type: none"> 1. Inclusion of a chapter on restriction/regulation of movement policy in the community meeting agenda. 	Jul. 2024	Continuous	/
	Conduct further investigations with towns related to requests for bribes from security guards, in order to set up a participatory approach to settle disputes.	Done	<ol style="list-style-type: none"> 1. Investigation has been conducted in 2024 by the Plant Protection Department (PPD) regarding the request for bribes from security guards. 2. LAC has conducted trainings to security guards on its policy on restriction/regulation of movement. 	<ol style="list-style-type: none"> 1. Awareness program on this policy are conducted on a monthly basis on all access points of the plantation. 	Dec. 2024	/	/
	Carry out awareness-raising with communities on the policy. Radio awareness already being done.	Continuous	<ol style="list-style-type: none"> 1. Awareness-raising on the policy have been carried out to reach all communities. 	<ol style="list-style-type: none"> 1. Ongoing radio awareness on this policy. 	Dec. 2024	Continuous	/

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Access to drinking water	Improve renovation and construction of hand pump by hiring qualified companies.	Continuous	<ol style="list-style-type: none"> LAC has improved renovation and construction of hand pumps with continuous evaluation of the quality criterias in participation with communities. Qualified companies have been hired for the hand pump construction. A quality control have been added in the technician contracts. LAC supervises the construction of hand pump to ensure quality of the process. All materials used for the hand pumps are from LAC stores to ensure highest quality. 	<ol style="list-style-type: none"> Monitoring visits on newly constructed hand pumps to assess the quality of the hand pumps. 	Continuous	/	/
	Put in place a monitoring system for hand pumps and implement. Train community dwellers to handle and trouble shoot minor repairs.	Continuous	<ol style="list-style-type: none"> Monitoring system for hand pumps has been put in place in close collaboration with communities. Engagement of chlorination programs by LAC to ensure maintenance of the wells. 	<ol style="list-style-type: none"> Inclusion of a chapter on hand pumps quality and monitoring in the community meeting. 	Continuous	/	/

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Access to drinking water	Assess communities' drinking sources and establish a phased priority program to provide safe drinking water for communities.	Continuous	<ol style="list-style-type: none"> 1. LAC has conducted an assesement on communities' drinking sources with a census by town. 2. LAC conducts annual census to assess and established the priority needs in consultation with communities. 	<ol style="list-style-type: none"> 1. Monitor the implementation of the program. 	Continuous	/	/

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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	<ol style="list-style-type: none"> Worker's community of origin is recorded and documented in personal files. LAC ensures that at equal skills/competences, preference is given to surrounding communities. 	<ol style="list-style-type: none"> Continual implementation of the improved measures. 	Continuous	/	/
	Document all workers irrespective of contracts or jobs.	Continuous	<ol style="list-style-type: none"> Documentation on workers are compiled and recorded in HR Department irrespective of their type of contracts. Monitoring of the measures implemented and availability of documents is conducted. 	<ol style="list-style-type: none"> Constant classment and record of workers' document. 	Continuous	/	/
	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	<ol style="list-style-type: none"> Monitoring system to control legal requirements is in place. Evidences of contracts paid above minimum wage for each type of worker. 	<ol style="list-style-type: none"> Maintenance of the monitoring system in place. 	Continuous	/	/

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Poor employment conditions, work safety and labor rights violations of subcontracted workers	Supply tools and PPE* to all workers free of charge and monitor their use.	Continuous	<ol style="list-style-type: none"> 1. Realization of a risk assessment to ensure identification of risks and appropriate PPE per operation. 2. Finalization and validation of the PPE matrix. 3. Field inspection to verify PPE supplied free of charge. 4. Interview with workers and contractors to verify respect of the procedure in place. 5. HSE trainings and Inductions on work safety and PPE free of charge. 	<ol style="list-style-type: none"> 1. Ongoing monitoring system and surveillance on contractors compliance to LAC requirements. 	Continuous	/	/
	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	<ol style="list-style-type: none"> 1. LAC has reinforced its monitoring system on subcontractors with regular inspections. 2. Radio announcements are conducted. 3. Reinforcement of the contractors' contract including compliance to Socfin Responsible Management Policy. 	<ol style="list-style-type: none"> 1. Ongoing monitoring system and surveillance on contractors compliance to LAC requirements. 	Continuous	/	/

* PPE: Personal Protective Equipment
06/2025

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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.	Done	1. LAC has developed and implemented a comprehensive smallholder strategy and approach that includes Standard Operating Procedures (SOPs) and policies for how middlemen deal with smallholders.	1. Awareness programs within the Local Rubber Purchase Department on the content of this procedure. 2. Monitor the implementation of the program.	Sep. 2024	/	/
	Conduct investigations into all bribes reported against agents, security guards and Quality Assurance team and take appropriate disciplinary action.	Continuous	1. Investigation has been conducted in 2024 by the Plant Protection Department (PPD) regarding the request for bribes from agents and security guards. 2. Record, management and resolution of claims from farmers are logged in. 3. Warning and sanction have been given for unwholesome practice towards smallholder farmers.	1. Monitoring of respect to procedure in place.	Continuous	/	/

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Food insecurity	Finalize participatory mapping with communities to assess whether or not they have sufficient farmland.	Started	<ol style="list-style-type: none"> SOP for participatory mapping has been developed. Implementation of the procedure through the realization of participatory mapping with communities is in progress. 	<ol style="list-style-type: none"> Inclusion of a chapter on participatory mapping in the community meeting agenda. 	Mar. 2025	Dec. 2025	Time underestimated due to logistic reasons (drone pictures).
	Conduct a food security assessment and design, implement, and monitor a food security strategy based on its results.	Started	<ol style="list-style-type: none"> LAC has started to investigate on the process to conduct a food security assessment. 	/	Dec. 2024	Dec. 2025	Prospection for specialists in charge of food security assessment in progress.

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