# SAC Action Plan

**UPDATE JUNE 2025** 



ALLEGATIONS			STATUS & IMPLEMENTATION				ME
	ACTIONS	STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY
Irregularities in the approval process of the leases and sub-leases agreement	Conduct a thorough review of sub-leases and take necessary steps to address the irregularities identified in consultation with the government.	Started	<ol> <li>Consultation with the government have been organized to address the irregularities identified.</li> <li>Consultation with experts is ongoing to guide SAC about the steps to be followed to resolve these discrepancies.</li> <li>A thorough review of subleases has been conducted by GeoData SL (Ltd), experts recommended by the Government, through the establishment of Land Committees in 2024.</li> <li>443 land owners have been identifed by the Land Committee during the concession survey.</li> <li>Maps identifying land owners' parcels have been created by GeoData SL (Ltd) and validated by communities.</li> <li>Final maps have been signed by the Direct Surveyor and the revision of sub-lease update is in progress based on the government recommendations.</li> </ol>	<ol> <li>Maintain open communication with communities.</li> <li>Assistance to land owners to register their land with the Government after validation of the Land Register Act by the government.</li> </ol>	Dec. 2024	Dec. 2025	National administration delay

06/2025

			STATUS & IMPLEMENTATION			TIMEFRAME		
ALLEGATIONS	ACTIONS	STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY	
Consultation, transparency and inclusiveness of landowners in the land acquisition	Implement the Action Plan ("Malen Chiefdom Action Plan to Identify Landowner Acreages and Determine the Annual Lease Rent for Each Land Owner") in collaboration with the company GeoData SL (Ltd), approved by the Land Commission SL.	Done	<ol> <li>The Action Plan has been implemented in collaboration with the company GeoData SL (Ltd), approved by the Land Commission SL.</li> <li>Landowners' acreages have been identified through the creation of the Land Committee.</li> <li>Annual lease rent for each land owners have been determined awaiting for payment strategy approval.</li> </ol>	<ol> <li>Ensurance of annual lease rents' payment for each land owners.</li> <li>Assistance to land owners to register their land with the Government after validation of the Land Register Act by the government.</li> </ol>	Dec. 2024	Apr. 2025	1. Land commissioner passed away in December 2024 2. Unresolved land conflict between 2 communities	
process	Address any claim (related to landowners' identification) that may arise during the implementation of the Action Plan.	Done	1. Land conflicts and claims have been investigated and adressed during the Land Survey conducted by GeoData SL from 2023 to 2024.	1. Continuous implementation of the complaints management system to ensure any claims arising are addressed.	Dec. 2024	/	/	

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Consultation, transparency and inclusiveness of landowners in the land acquisition process	Study the possibility of sharing land lease agreements with the Land Commission as part of the process of distributing land titles to landowners.		1. SAC started discussion with the relevant authorities to study the possibility of sharing land lease agreements with the Land Commission.	1. Provide communities with updates on any potential futur changes changes or renewals to sublease terms.	Mar. 2025	Dec. 2025	National administration delay

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Crop compensation	Address any claim (related to crops compensation) that may arise during the Action Plan.	Done	<ol> <li>Land conflicts and claims have been investigated and adressed during the Land Survey conducted by GeoData SL from 2023 to 2024.</li> </ol>	1. Continuous implementation of the complaints management system to ensure any claims arising are addressed.	Dec. 2024	/	/	

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ALLEGATIONS	ACTIONS	STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY	
	Identify landowners and their acreages during the action plan.	Done	<ol> <li>Landowners and their acreages have been identified.</li> </ol>	SAC keeps an open dialogue on the identified landowners' acreages during the community meetings.	Dec. 2024	/	/	
Inequities in land lease payments	Examine with the Law Office the possibility of the company paying land leases directly into landowners' bank accounts.	Started	<ol> <li>SAC is examinating the possibility of land leases payment paid on landowners' bank accounts and the different stages of support have been defined.</li> <li>Seek legal advice on the next steps to take when all land titles will be registered with the Land Commission.</li> </ol>	<ol> <li>Assistance to land owners to register their land with the Government and obtain their land titles after validation of the Land Register Act by the government.</li> <li>Engage landowners to explore the possibility of opening a bank account for each landholding family.</li> </ol>	Mar. 2025	Pending validation of the Land Registrati on Act.	Pending validation of the Land Registration Act.	
	A clear documentation process must be set up to monitor the payment of land lease.	Started	1. SAC is monitoring land lease payment by keeping payment receipt from the Local Authority office.	<ol> <li>Once land titles are officially registered by the Land         Commission (pending the Land registration Act), then the company will change the payment startegy.</li> <li>Ongoing monitoring of the payment of land lease.</li> </ol>	Mar. 2025	Pending validation of the Land Registrati on Act.	Pending validation of the Land Registration Act.	

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Documentation compensation process	Each step of community engagement for the action plan should be clearly documented, and available at all section chief level with their acknowledgement of receipt.	Started	<ol> <li>Step of community         engagement for the action         plan has been clearly         documented through the         Land Committee         establishment and land         owners' consultations.</li> <li>Each step of community         engagement for the action         plan has been described in         GeoData SL report:         "06/11/2024: GIS Survey of the         Family Land Holdings in SAC         Concession".</li> </ol>	1. Monitoring of the availability of the Community engagement report at section chief level.	Feb. 2025	Jul. 2025	Delays in records sharing from Geo Data.	

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Degradation	Evaluate the dynamics of the evolution of greenbelts since project implementation.	Started	<ol> <li>Greenbelts have been mapped.</li> <li>Evolution of the greenbelts has been compared to evaluate the dynamics of their size.</li> <li>Analysis of this evolution has been realized and discussed during community meetings.</li> </ol>	SAC keeps an open dialogue     on the greenbelts' evolution     during community meetings.	Feb. 2025	Sep. 2025	Time underestimated due to logistic reasons (drone pictures).
of natural areas and lack access to land for farming	Update the customary maps with the communities.	Started	<ol> <li>The update of the 53 customary maps in a participative way is in progress.</li> <li>Drone pictures of the greenbelts have been completed and will be amended in the customary maps for validation by communities.</li> <li>Updated copies of the customary maps will be provided to communities or displayed on Notice Boards.</li> </ol>	SAC keeps an open dialogue     on the customary mapping     during community meetings.	Jun. 2025	Sep. 2025	Time underestimated due to logistic reasons (drone pictures).

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Degradation of natural areas and lack access to land for farming	Continue to regularly engage with stakeholders regarding the implementation of alternative projects.	Continuous	1. Engagement with stakeholders regarding the implementation of alternative projects is continuous during the community meetings.	<ol> <li>Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities.</li> <li>Monitor alternative project implemented to identify areas of improvement.</li> </ol>	Continuous	/	/

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Smallholders oil palm out- grower scheme	Engage with stakeholders to discuss alternatives to oil palm outgrower.	Started	<ol> <li>Engagement with stakeholders is ongoing trough community meetings planned on quarterly basis with the agenda of meetings.</li> <li>Meeting with Malen Chiefdom Development Committee to discuss communities' projects.</li> </ol>	<ol> <li>Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities.</li> <li>Monitor the implementation of all the alternatives activities implemented with the communities.</li> </ol>	Mar. 2025	Jul. 2025	Delays due to the creation of Malen Chiefdom Development Committee.	

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Access to drinking water	Carry out a review of the water wells built by SAC in order to implement appropriate corrective measures where possible.	Done	<ol> <li>A census of all water wells has been conducted to identify the priority needs in term of availability of drinking water.</li> <li>SAC has appointed a construction team in charge of community' water wells maintenance and repairs.</li> </ol>	<ol> <li>Annual planning of a water wells census to ensure verification of the availability of drinking water.</li> <li>Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities.</li> </ol>	Jul. 2024	/	/
	Define Company standards for the quality of the hand pumps with the communities and put in place a clear monitoring system for those infrastructures.	Done	<ol> <li>Establisment of a Company standard for the construction of hand pump to guarantee quality of each well.</li> <li>Development of a monitoring system for the water infrastructures.</li> </ol>	<ol> <li>Inspection of the water wells infrastructure to ensure respect of the Company quality standards.</li> <li>Continuous monitoring of the water wells quality.</li> </ol>	Jul. 2024	/	/

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	ACTIONS	STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY	
Water and waste management	Define a distance limit to be respected with communities/quarters and blocks receiving EFBs*.	Done	<ol> <li>SAC has defined a distance limit to be respected with communities/quarters and blocks receiving EFBs.</li> <li>Communication has been made by SAC to communities on the defined distance.</li> <li>SAC has defined a map for EFB application with prohibited areas.</li> </ol>	<ol> <li>Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities.</li> <li>Monitor regularly the implementation of the map for EFB application with prohibited areas.</li> </ol>	Jun. 2024	/	/	
	Regularly maintain culverts to prevent flooding.	Continuous	<ol> <li>SAC has a road maintenance plan which includes the maintenance of culverts to prevent flooding.</li> <li>SAC has put in place a monitoring of culverts.</li> </ol>	Continuous monitoring of culverts along the main road.	Continuous	/	/	

<sup>\*</sup> EFB: Empty Fruit Bunch

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Water and waste management	Ensure appropriate treatment and traceability for different types of waste.	Done	<ol> <li>SAC has a waste         management plan comprising         the types of waste per origin         and the details appropriate         treatment.</li> <li>SAC waste panagement plan         is audited during RSPO and         ISO annual audits.</li> <li>Recyclers audits are also         conducted to ensure         appropriate treatment of all         types of waste.</li> </ol>	1. Continuous monitoring of all types of waste and appropriate treatment.	Mar. 2025	/	/
	Conduct further analysis to determine the origin of phosphate compounds in surface water in order to take appropriate action.	Done	<ol> <li>SAC has conducted further analysis to determine the origin of phosphate compounds in surface water in order to take appropriate action.</li> <li>SAC has engaged biodiversity experts to analyse the origin of phosphate compounds in surface water which has lead to an serie of recommandation translated into an action plan.</li> </ol>	1. Implementation and monitoring of the action plan.	Jul. 2024	/	/

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Sexual harassment and gender- based violence	Provide enhanced training for Gender Committee.	Done	<ol> <li>Trainings have been provided to Gender Committee members through the engagement and support of external experts.</li> <li>Gender Committee training is included into the annual training calendar.</li> </ol>	<ol> <li>Continuous trainings to Gender Committee.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	May 2024	/	/
	Promote inclusivity within the Gender Committee by including a representative for each department.	Done	<ol> <li>Inclusivity of the Gender         Committee has been         promoted through the         inclusion of representatives for         each department,         contractors' companies and         community leaders.</li> <li>The Gender Committee         members has been updated         on 31/01/2025 and displayed         on notice boards.</li> </ol>	<ol> <li>Ongoing oral and visual communication on the Gender Committee existence and roles.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	May 2024	/	
	Strengthen training programs on sexual harassment and gender-based violence that covers all levels of workers.	Done	1. Training programs on sexual harassment and gender-based violence have been strenghtened to cover all levels of workers.	<ol> <li>Continuous trainings on Gender Committee.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	Dec. 2024	/	/

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ALLEGATIONS	ACTIONS	STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY
Sexual harassment and gender- based violence	Establish budget to strengthen the Gender Committee.	Done	1. The Gender Committee has been strenghtened with the definition of a program of activities and appropriate budget.	<ol> <li>Implementation of a program to conduct Gender Committee activities.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	Nov. 2024	/	/
	Strengthen the Gender Committee: by hiring additional in-house qualified staff or studying the possibility of collaborating with an external body.	Done	<ol> <li>Engagement with EF has been made to advise on external bodies that have assisted SAC as expert on gender issues.</li> </ol>	<ol> <li>Continuous trainings to Gender Committee.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	Dec. 2024	Mar. 2025	Assessment to be carried out by top management to study the need to appoint a full time.
	Ensure that all cases of Sexual Harassment (SH) and Gender-Based Violence (GBV) are reported to the Gender Committee.	Done	<ol> <li>The Gender Committee is responsible to handle all cases of Sexual Harassment.</li> </ol>	<ol> <li>Continuous trainings to Gender Committee.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	Dec. 2024	/	/

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Sexual harassment and gender- based violence	Establish a hotline (as part of an effective grievance system) for reporting sexual harassment at the workplace.	Done	A hotline has been created for reporting sexual harassment at the workplace.	<ol> <li>Continuous oral and visual communication on the hotline number.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	Oct. 2024	Feb. 2025	Technical issues with the national operator of the hotline.	
	Ensure pictorial communication warning signs within the plantation that indicate clear disciplinary process and zero tolerance of sexual harassment.	Done	1. Pictorial communication warning signs have been displayed within the plantation indicating clear disciplinary process and zero tolerance of sexual harassment.	<ol> <li>Continuous oral and visual communication on the hotline number.</li> <li>Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".</li> </ol>	Jun. 2024	/	/	

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Air pollution	Ensure communities along the main road have speed bumps.	Done	<ol> <li>SAC has a road maintenance plan which includes the provision of speed bumps per community with sign boards along the main road.</li> <li>SAC has put in place a monitoring of the speed bumps creation to ensure they are refreshed at regular frequency.</li> </ol>	1. Continuous monitoring of the speed bump along the main road.	May 2025	/	/
	Train drivers from the company on road safety.	Done	1. SAC has engaged external experts from "the Sierra Leone Opportunities Industrialization Centres" (SLOIC) to conduct assessment report on trucks, light vehicles and tractor drivers of SAC followed by a complete training session.	Continuous respect to training calendar including road safety trainings to drivers.	Dec. 2024	/	/

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Air pollution	Continue to regularly sensitize road users on road safety.	Continuous	<ol> <li>Road safety sensitization are organized on regular basis.</li> <li>Road safety awareness are included in the HSE minutes among workers and communities to ensure road users are sensitized.</li> <li>Radio communication called "Socfin Hour" is conducted on road safety.</li> </ol>	1. Continuous respect to Training Calendar including Road Safety awarenesses to road users.	Continuous	/	/
	Continue recording and investigating all road accidents.	Continuous	<ol> <li>Road accidents records are updated at all times.</li> <li>Investigation reports are conducted with inclusion of root causes analysis to understand any accident and develop corrective measures to avoid occurrence.</li> </ol>	Continuous recording and investigating all road accidents.	Continuous	/	/
	Continue to record road consumption of water.	Continuous	Water consumption is recorded during application on road to reduce dust emissions.	Continuous record of water consumption.	Continuous	/	/

		STATUS & IMPLEMENTATION			TIMEFRAME		
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Employment conditions, work safety and labor rights violations	Provide a medical check to all workers irrespective of their contracts and nature of work.	Started	<ol> <li>Medical check ups conducted to all workers irrespective of their contracts and nature of work is in progress.</li> <li>Update of the monitoring file to include an automatic follow-up of the check-up date.</li> </ol>	1. Organization of spot inspections to verify respect of the procedure among the working staff.	Feb. 2025	Aug. 2025	Delays in the review of the contractor' contracts.
	Design a monitoring template to monitor workers especially in the mill, ensure working hours conform with the Employment Act 2023.	Done	<ol> <li>Communication on the Employment Act 2023 has been conducted to describe the content of the act.</li> <li>Monitoring template has been designed to ensure conformity of the working hours at the palm oil mill.</li> </ol>	1. Organization of spot inspections to verify respect of the procedure among the working staff.	Jun. 2024	/	
	Review the transport allowance for workers.	Done	<ol> <li>Transport allowance has been revised for workers and included inside their monthly pay slips.</li> </ol>	<ol> <li>Organization of spot inspections to verify payment of the transport allowance based on the new rate.</li> </ol>	Mar 2024	/	

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Employment conditions, work safety and labor rights violations	Review and implement recruitment and hiring procedures types of workers (seasonal, contractors, etc.).	Started	<ol> <li>The recruitment and hiring procedure has been updated per type of workers.</li> <li>Awareness and sensitization are conducted to inform workers about the updated procedure.</li> <li>For new recruitment, a description will be included in the annoucement and induction.</li> </ol>	<ol> <li>Continual awareness of the recruitment procedure.</li> <li>Monitoring of the induction program records for new workers.</li> </ol>	Sep. 2024	Jul. 2025	Restructuration of HR Department and availabilities of ressources.
	Review and update the workforce spreadsheet and include workers ages and date contract signed.	Done	1. The workforce spreadsheet has been updated to include workers ages and date of contract signed.	Continual awareness of the recruitment procedure.	Jun. 2024	/	/
	Study the possibility of collecting worker's community origin information for new recruit.	Done	<ol> <li>Update of the workforce spreadsheet to include the worker's community origin information at his will.</li> </ol>	Continual awareness of the recruitment procedure.	May 2025	/	/

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Employment conditions, work safety and labor rights violations	Ensure communities with a barray built by SAC have a notice board to post information about work opportunities and their rights at work + how to report abuse/corruption.	Done	The list of barray built by SAC has been created to ensure recording of the presence of notice boards.  The list of barray built by SAC has been created to ensure serving the presence of th	1. Continual maintenance of the documents displayed on the notice board to ensure ongoing communication.	Oct. 2024	/	/

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Criminalization and intimidation of NGOs by local authorities: judicial harassment	Communicate SAC's policy on human right to the local authorities and communities.	Done	1. SAC's policy on human right has been communicated to the local authorities and communities.	1. SAC keeps an open dialogue on the communication of its human rights policy during community meetings.	Nov. 2024	/	/

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Infringements by local authorities of freedom of movement and association	Publicly promote policy on the freedom of association with the Chiefdom authorities, and publicly affirm that all stakeholders are welcome in SAC's concession.	Done	<ol> <li>Promotion of the policy on the freedom of association has been conducted with publication in the Chiefdom authorities.</li> <li>Public affirmation has been done that all stakeholders are welcome in SAC's concession.</li> </ol>	1. Regular announcements are conducted on the radio about the policy on the freedom of association and the welcome of stakeholders in the concession.	Nov. 2024	/	
	Review the Company's security strategy with Chiefdom Committee, CSOs* (relevant stakeholders).	Done	1. The Company's security strategy with Chiefdom Committee, CSOs and relevant stakeholders has been revised.	<ol> <li>Ensure that the Company security approach is fair, transparent, and inclusive of community members.</li> <li>Regular engagement of community members on security concerns and updates.</li> </ol>	Jan. 2025	Sep. 2025	Global re- organization to be done in collaboration with the Grievance Committee.

<sup>\*</sup> CSO: Civil Society Organisation

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Buffer zones	Continue to implement the remediation and compensation plan.	Continuous	<ol> <li>The remediation and compensation plan is implemented since 2017, its implementation is continuous.</li> <li>Monitoring of this plan is available and audited every 2 years by an external biodiversity agency.</li> </ol>	1. Continuous implementation of the remediation and compensation plan.	Continuous	/	
	Sensitize communities on the purpose of the riparian areas.	Done	1. Sensitization to communities on the purpose of riparian areas is ongoing through meetings, sensitization programs and radio communications.	1. Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities.	Jul. 2024	/	/

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Analysis of the impact of the loss of	Engage the Ministry of Lands/Agriculture to assess the food security in Malen Chiefdom.	Done	<ol> <li>The Ministry of         Lands/Agriculture has been         engaged to assess the food         security in Malen Chiefdom.</li> <li>Recommendations have been         identified and translated into         an action plan.</li> </ol>	<ol> <li>Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities.</li> <li>Monitor the implementation of the action plan.</li> </ol>	Jan. 2025	Mar. 2025	Slow responses from Ministry of agriculture
agricultural land on the communities' right to food	Continue to engage with community members on alternative livelihoods projects.	Continuous	<ol> <li>Engagement with stakeholders is ongoing trough the Social and Grievance Committee meetings organized on the last Friday of each month.</li> <li>Alternatives livelihoods projects are discussed with communities.</li> </ol>	<ol> <li>Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities.</li> <li>Monitor the implementation of alternatives livelihoods projects to identify areas of improvement.</li> </ol>	Continuous	/	/

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Analysis of the impact of the loss of agricultural land on the communities' right to food	Finalize participatory customary mapping with communities.	Started	<ol> <li>The update of the 53         customary maps in a         participative way is in         progress.</li> <li>Drone pictures of the         greenbelts have been         completed and will be         amended in the customary         maps for validation by         communities.</li> <li>Updated copies of the         customary maps will be         provided to communities or         displayed on notice boards.</li> </ol>	1. SAC keeps an open dialogue on the customary mapping during community meetings.	Jun. 2025	Sep. 2025	Time underestimated due to logistic reasons (drone pictures).
	Update the identification criteria of vulnerable people and update the list per community.	Done	<ol> <li>Identification criteria of vulnerable people has been updated in the instruction IN- CL-009.</li> <li>The list of vulnerable people per community has been updated based on the revised identification criteria.</li> </ol>	Continuous usage of the updated criteria for identifying vulnerable people.	Mar. 2025	/	/

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