

SRC Action Plan

UPDATE JUNE 2025



SRC – ACTION PLAN – JUNE 2025

ALLEGATIONS	ACTIONS	STATUS & IMPLEMENTATION				TIMEFRAME
		STATUS	MEASURES IN PLACE PRIOR EF VISIT BEFORE MAY 2023	MEASURES IMPLEMENTED POST EF VISIT BETWEEN MAY 2023 TO JULY 2024	MEASURES IMPLEMENTATION POST SRC DIVESTMENT AFTER OCTOBER 2024	
Limited recruitment and hiring	First priority is always to re-employ people with clean track records who were laid off for economic reasons – need to finalise re-hiring of people laid-off in 2020.	Done	1. Recruitment procedure.	<ol style="list-style-type: none"> SRC has updated its recruitment procedure (PEP102) to include the hiring methodology and steps. SRC has developed recruitment forms with details on previous work experience for verification of track records. 	<ol style="list-style-type: none"> New owner is recruiting new staff based on updated SRC procedures. 	2024
	Although most of the employees are from the communities around SRC, the recruitment procedure will be fine tuned in consultation with community leaders; it will include a point on giving, at equal skills and competencies, preference to local community.	Done	1. Recruitment procedure.	<ol style="list-style-type: none"> Update of the recruitment procedure (PEP102) has been done with the inclusion of a chapter on “giving at equal skills and competencies, preference to local community”. 	<ol style="list-style-type: none"> New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently. 	Dec. 2023

SRC – ACTION PLAN – JUNE 2025

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Limited recruitment and hiring	Design a job announcement communication procedure for communicating work opportunities to nearby townspeople, including opportunities to work as permanent employees, contract workers (long-term and short-term contract workers) and casual workers.	Done	<ol style="list-style-type: none"> Public job announcements to involve communities in recruitment process. Work opportunities provided to nearby communities. 	<ol style="list-style-type: none"> Job announcement communication has been clarified and included in the recruitment procedure (PEP102). Creation of a vacancy notice with explicit type of work requirements. 	<ol style="list-style-type: none"> New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently. 	Dec. 2023

SRC – ACTION PLAN – JUNE 2025

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Limited recruitment and hiring	Design a job application procedure, with the town of origin of applicants confirmed by town leaders. The procedure will be very specific on zero tolerance for corruption or bribes.	Done	1. Recruitment procedure.	<ol style="list-style-type: none"> 1. Town of origin of applicants has been integrated in the job application forms. 2. A chapter on zero tolerance for corruptions and bribes has been included in the recruitment procedure (PEP102). 3. Involvement of cluster heads for the confirmation of the town of origin of applicant is done during the recruitment process as discussed during cluster meetings. 	<ol style="list-style-type: none"> 1. New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently. 	Dec. 2023

SRC – ACTION PLAN – JUNE 2025

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Limited recruitment and hiring	Consult with town leaders and community members in focus group discussions to ensure the procedures are well understood.	Done	1. Focus group discussions on recruitments and job opportunity were included in cluster meeting agendas.	<ol style="list-style-type: none"> 1. Consultations with town leaders and community members in focus group discussions occurred in 2023. 2. Short term employment forms are signed by the community leader. 3. Meeting with clusters on recruitment procedure and related documents. 	1. New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently.	Dec. 2023
	Monitor to ensure that the recruitment procedure, the job announcement communication procedure and the job application procedure are followed.	Done	1. Recruitment procedure.	1. Monitoring of compliance to the recruitment procedure is verified by the use of updated documents.	1. New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently.	Jan. 2024

SRC – ACTION PLAN – JUNE 2025

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Limited recruitment and hiring	Be clear and transparent in the written contracts about what pay calculations, benefits, and rights are for short-term contract and casual workers.	Done	1. Recruitment procedure.	1. Creation of the PEF105 form that contain details on pay calculations, benefits, and rights for short-term contract and casual workers.	1. New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently.	Jan. 2024
	Put notice boards in each community to post recruitment and position pay and benefits , and how to report grievances.	Done	1. Recruitment procedure.	1. Notice boards supplied in 2024 in 34 communities. 2. Recruitment related documentation has been displayed on notice boards.	1. New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently.	Jan. 2024

SRC – ACTION PLAN – JUNE 2025

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Limited recruitment and hiring	Check community origin information of workers with respective town leaders for accuracy.	Done	1. Details of employees' origin available.	<ol style="list-style-type: none"> 1. Improvement on community origin verification included in the recruitment procedure. 2. Recruitment forms are signed by town leaders for accuracy. 3. Involvement of cluster heads for the confirmation of the town of origin of applicant is done during the recruitment process as discussed during cluster meetings. 	<ol style="list-style-type: none"> 1. New owner has adopted the updated SRC recruitment procedure (PEP102) and policy which are implemented currently. 	Jan. 2024

SRC – ACTION PLAN – JUNE 2025

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Reprisals, bribes and intimidation	Do a specific anti-corruption training to security staff followed by close monitoring to confirm adherence to ethical standards, including by checking for grievances with local communities.	Done	<ol style="list-style-type: none"> 1. Anti-corruption policy in place. 2. Security policy. 3. Security risk assessment plan. 4. Grievances mechanisms in place. 	<ol style="list-style-type: none"> 1. Anti-corruption training workshops have been organized for security staffs to ensure respect of an effective monitoring system that will guarantee adherence to professional and ethical standards. 2. Bribery topic has been included in cluster meeting agenda. 3. Development of an effective monitoring system. 	<ol style="list-style-type: none"> 1. Implementation of a training program on anti-corruption to security staff by new owner. 	Sep. 2023

SRC – ACTION PLAN – JUNE 2025

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Limited access to safe drinking water	Update the inventory of current drinking water sources for each town, and co-create plans for drinking water protection and improvement.	Done	<ol style="list-style-type: none"> List of CSR* projects realized by year 2018–2023. Cluster meetings with requests for CSR needs from communities. 	<ol style="list-style-type: none"> SRC has updated the inventory of current drinking water sources for each town from December 2023 to May 2024. The process of this inventory was conducted in a collaborative way with the participation of each town through the completion of the “community profile form” by community leaders. Communities represented by town leaders have sent their requests of hand pumps through official letters. After completion of the census and taking into consideration specific requests from communities, plans for drinking water protection and improvements have been established leading to the installation of new bore wells and hand pumps, with priority given to areas of highest need. After completion of each projects, community members from various clusters have written to SRC to express their appreciation about the construction of hand pumps. 	<ol style="list-style-type: none"> As a long-term strategy, updated inventory has been provided to the new owner of SRC to serve as a guideline for the co-development of CSR projects and priority needs identified by communities. 	2023–2024

SRC – ACTION PLAN – JUNE 2025

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Limited access to safe drinking water	Work with Monkey Tail Town to ensure a safe source of drinking water.	Done	1. Construction of hand pump listed in community projects.	<ol style="list-style-type: none"> 1. Meetings between SRC and Monkey Tail Town representatives about provision of safe source of drinking water. 2. Monkey Tail town has requested for a new hand pump which was agreed by SRC. 3. April 2024: the new hand pump has been handing over to the Monkey Tail town. 4. Water analysis have been conducted to ensure that the water is safe for drinking. 	<ol style="list-style-type: none"> 1. New owner continues to support communities with timely maintenance and upkeep of hand pumps and bore-wells. 	Oct. 2023

SRC – ACTION PLAN – JUNE 2025

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Sexual harassment	Strengthen SRC's sexual harassment policy with specific examples and clear steps for investigation and penalty.	Done	1. SRC sexual harassment policy.	<ol style="list-style-type: none"> 1. SRC's sexual harassment policy has been strengthened with specific examples and clear steps for investigation and penalties. 2. SRC has engaged an independent Liberian women's NGO called ADWANGA (Aiding Disadvantaged & Traumatized Women and Girls) on sexual harassment issues. 3. Sexual harassment awareness programs have been conducted in April 2024 by ADWANGA. 	<ol style="list-style-type: none"> 1. As a long-term strategy, the previous SRC's policy and procedure documents have been adopted in their entirety by the new owner. 2. The Gender Committee has been revamped with additional members and expanding its scope to the new owner factory, in addition to plantations. 	Sep. 2023

SRC – ACTION PLAN – JUNE 2025

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Sexual harassment	Review the hiring process by contractors and tappers to prevent third-party requests for indecent favours such as exchanging sexual favours.	Done	1. Recruitment procedure.	<ol style="list-style-type: none"> 1. Update of the recruitment procedure (PEP102). 2. Hiring process has been revised to prevent third-party requests for indecent favours. 	<ol style="list-style-type: none"> 1. Implementation of the recruitment procedure (PEP102) by new owner which clearly provides guidance in this direction. 	Dec. 2023

SRC – ACTION PLAN – JUNE 2025

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Sexual harassment	Develop strategies to increase the representation of women in decision-making roles.	Done	1. Recruitment procedure.	<ol style="list-style-type: none"> 1. Strategies to increase the representation of women in decision-making roles have been developed by the update of the recruitment procedure to integrate gender balance in the workplace. 2. The recruitment procedure (PEP102) has been revised to adress the representation of women and equal opportunity. 3. Example of increase of the representation of women in decision-making roles such as work place representatives. 	<ol style="list-style-type: none"> 1. Implementation of the recruitment procedure (PEP102) by new owner. 	Dec. 2023

SRC – ACTION PLAN – JUNE 2025

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Sexual harassment	Clarify and implement steps for investigation and penalties for cases of sexual harassment, including in specific cases already identified and prevention of retaliation.	Done	<ol style="list-style-type: none"> SRC Sexual harassment policy. Gender Committee. Trainings and awareness on Gender Committee roles and on sexual harassment policy. 	<ol style="list-style-type: none"> SRC's Sexual harassment complaint procedure has been updated with: <ul style="list-style-type: none"> Steps for investigation, Penalties for cases of sexual harassment, Prevention of retaliation, Sexual harassment complaints procedure flowchart, Severity matrix, Inclusion of non-retaliation form, Duties for confidentiality and counseling. Awareness of the updated procedure have been conducted. 	<ol style="list-style-type: none"> The new owner has adopted SRC's previous policy and procedure document on sexual harassment and Gender Committee which takes care of these aspects. 	Sep. 2023

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Sexual harassment	Strengthen the reporting mechanism for sexual harassment by working with outside experts to carry out a series of focus group discussions with women workers and in communities.	Done	<ol style="list-style-type: none"> 1. Reporting mechanism for sexual harassment. 2. Grievance logging file. 	<ol style="list-style-type: none"> 1. Adwanga, a liberian NGO, has been contracted by SRC based on EF recommendation, for external support. 2. Focus group discussions with women workers and communities and ADWANGA. 3. Awareness activities on sexual harassment and Gender Committee done by ADWANGA. 4. Investigation/counselling conducted by ADWANGA with victims of sexual harassment. 5. Report from ADWANGA. 6. ADWANGA has engaged with victims of sexual harassment however they did not want to share the names of their alleged perpetrators to SRC management. As a result, unfortunately it was not possible to take any disciplinary actions. 7. SRC remained firmly committed to a zero-tolerance policy on sexual harassment and reaffirmed its engagement to take appropriate disciplinary actions within the framework of applicable law. 	<ol style="list-style-type: none"> 1. As a long-term strategy, the updated procedure and policy have been implemented by the new owner. 2. The new Gender Committee is already in action in these directions. 3. Regarding the historical incidents of sexual harassment identified by EF, the outsourced agency ADWANGA concluded that the affected individuals do not wish to pursue the matter further for the purpose of punitive action. In the absence of corroborative evidence or supporting documentation, it is not possible to pursue this matter further. Emphasis will henceforth be placed on preventive measures and ensuring non-recurrence of such incidents in any form. 	End of 2024

SRC – ACTION PLAN – JUNE 2025

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Sexual harassment	Strengthen the Gender Committee – either by hiring an independent Liberian women’s NGO to carry out the role, or through additional recruitment, training and resources for an in-house Gender Committee.	Done	1. Gender Committee.	<ol style="list-style-type: none"> 1. Improvement of the Gender Committee structure and ToR*. 2. Collaboration with ADWANGA to provide an external support in the communication and training of the Gender Committee among the communities. 	<ol style="list-style-type: none"> 1. The implementation of existing procedures and policies on sexual harassment, along with the reconstitution of the Gender Committee by the new ownership, aligns with the required standards. 2. A government-affiliated agency appointed by the Ministry of Gender, Children and Social Protection is actively supporting the new Gender Committee in professionally addressing related matters. 	Oct. 2023

* ToR: Terms of reference

SRC – ACTION PLAN – JUNE 2025

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Sexual harassment	Strengthen training on sexual harassment – ensure all workers receive training with clear examples and signed understanding.	Done	<ol style="list-style-type: none"> 1. SRC sexual harassment policy. 2. Trainings on sexual harassment policy. 	<ol style="list-style-type: none"> 1. Trainings and awareness on sexual harassment have been organized in various locations to ensure better understanding of the revised policy by all workers. 2. Collaboration with ADWANGA to provide an external support in the communication and training on sexual harassment among workers and communities. 	<ol style="list-style-type: none"> 1. The implementation of existing procedures and policies on sexual harassment, along with the reconstitution of the Gender Committee by the new ownership, aligns with the required standards. 2. A government-affiliated agency appointed by the Ministry of Gender, Children and Social Protection is actively supporting the new Gender Committee in professionally addressing related matters. 	Sep – Dec 2023

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Sexual harassment	Ensure workstation assignment of female security personnel takes into consideration minimising sexual harassment risk exposure.	Done	1. SRC sexual harassment policy.	1. Workstation assignment of female security personnel has been revised to take into consideration minimising sexual harassment risk exposure.	1. Implementation of previous procedures and policies by new owner.	Sep – Dec 2023

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Crop compensation	Development of a process for resolving the crop compensation issues which must include focus group discussions with town leaders and community members to ensure that it is well understood, transparent, and agreed to by elected town leaders.	Done	<ol style="list-style-type: none"> 1. Compilation of all documentation available on crop compensation process. 2. Meetings with discussion on land claims. 3. Logging and treatment of grievances related to land claims with responses, investigations, surveys conducted. 4. Involvement of the Ministry of Agriculture and Land Commission in the crop compensation process. 	<ol style="list-style-type: none"> 1. Improvement on the traceability of the documentation (filing and records by category, crop owners and dates...). 	<p>A process for resolving the crop compensation issues has been developed through:</p> <ul style="list-style-type: none"> • A verification of all evidences available for each step of "SRC Crop Compensation Procedure", • A deep analysis of all the documentation available regarding crop compensation (census sheets, analysis of cash crop, receipt/release of crop owner, payment invoices, crop summary sheets, announcement letters for census and payment, confirmation letter of crop payments ...), • A general crossing of information for each crop owner (census figures, letters signed, amount perceived, agreement provided...), • A verification of the legality of the process with confirmation that land commissioner/Ministry of Agriculture were involved during the compensation process, • A review of compensation process documentation related to focus group discussions with town leaders, community members and cluster heads (meeting minutes, letters, signed crop census/inventories...), • An analysis of crop compensation claims raised (letters of complainants, evidences and resolutions, survey notices, investigation and reports, disclosure of findings with parties concerned involving Liberia land Commission and licenced surveyor, agreements letters), • A compilation of a comprehensive excel table to verify crop calculations, prices, amounts, number of crop owners... 	Start by Q4 2023

SRC – ACTION PLAN – JUNE 2025

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Crop compensation	Implement agreed process for resolving substantiated crop compensation grievance.	Done	<ol style="list-style-type: none"> 1. Compilation of all documentation available on crop compensation process. 2. Meetings with discussion on land claims. 3. Logging and treatment of grievances related to land claims with responses, investigations, surveys conducted. 4. Involvement of the Ministry of Agriculture and Land Commission in the crop compensation process. 	<ol style="list-style-type: none"> 1. Improvement on the traceability of the documentation (filing and records by category, crop owners and dates...). 	<ol style="list-style-type: none"> 1. A process for resolving the crop compensation issues has been developed through a deep analysis of the documentation, census records, payments details, reports from Land Commission/ Authority, claims, letters, resolution mechanisms. 2. A deep analysis on crop compensation claims raised to SRC has been conducted through the revision of documents, investigations and resolution process and measures taken with the complainants. 3. This review has confirmed the resolution of substantiated crop compensation grievances raised to SRC. 	2024

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Old Town site/sacred sites	Strengthen a constructive and respectful relationship with surrounding towns, including having a process to gather historical evidence of old towns relocation pre-dating the acquisition of the plantation by Socfin.	Done	<ol style="list-style-type: none"> SRC has established a constructive and respectful relationship with surrounding towns through regular community meetings. SRC has a community development plan and a stakeholder engagement plan describing its communication and engagement strategy with its communities (last version 01/01/2020). SRC has gathered evidence of old towns relocation pre-dating the acquisition of the plantation by Socfin (prior 2007) in: <ul style="list-style-type: none"> Letters of specific requests from communities, MoUs*, Maps Sites identification. SRC has logged evidences on identification and mapping of preserved areas as requested by communities. 	<ol style="list-style-type: none"> SRC has strengthened its relationship with surrounding communities through regular cluster meetings and the organization of a census in communities conducted from december 2023 to may 2024. The process of this census was conducted with the participation of each town through the completion of the "community profile form" by community leaders. A comprehensive Community Profile database has been established comprising: <ul style="list-style-type: none"> Old towns situation (names, locations, population...), Chronology and inventory of discussions, letters and meetings between SRC and the surrounding communities, Evolution of towns and communities by clusters. 	<ol style="list-style-type: none"> The new owner has introduced a renewed approach to community engagement. Following feedback from broader community groups during a mass meeting chaired by the new CEO/Chairman of SRC, the cluster-based engagement system was discontinued. Instead, a dedicated Community Liaison Officer (CLO) has been appointed to manage ongoing and direct interactions with the community. The new owner is predominantly focused on implementing forward-looking and progressive measures, placing emphasis on future development. 	Start by Q4 2023

* MoU: Memorandum of Understanding

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Old Town site/sacred sites	Update a profile for each town including an inventory of water sources, employment, access to infrastructure, access to farmland, town development priorities, etc.	Done	1. CSR annuals programs established based on the community needs.	<ol style="list-style-type: none"> 1. The profile for each town has been updated in 2023 including an inventory of water sources, employment, access to infrastructure, access to farmland, town development priorities... 2. The process of updating the community profile has been socialized with each town that filled a "community profile forms". 	<ol style="list-style-type: none"> 1. The community profile has been splitted by dates in order to highlight the evolution of the communities profile in time with identification of CSR co-developped per year to adress in priority the highest community needs. 2. An additional update of the community profile is in progress in 2025 in order to provide the new owner with an accurate census. 	Start by Q4 2023

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Old Town site/sacred sites	Co-develop CSR development plans prioritizing the highest needs with town and cluster leaders. Do so in a collaborative and transparent way so that all town leaders and community members are able to easily access information about what activities are in the CSR development plans and the agreed time frame for implementation.	Done	1. Cluster meetings records with discussions on co-development of CSR projects.	<ol style="list-style-type: none"> 1. The update of the community profile for each town has been conducted in a collaborative and transparent way. 2. The outcome of this community profile are CSR development plans co-developped by communities and SRC with agreed timeframes, this is illustrated through the compilation of the "community profile forms", letters, cluster meetings... 3. CSR projects prioritizing their highest needs have been identified by communities with a focus on water issues through the construction of several hand pumps in communities. 4. Improvement of communication with communities through the use of notice boards. 	<ol style="list-style-type: none"> 1. The updated profile form has been communicated to the new owner to propose a roadmap on CSR idenfication based on the town development priorities. 	2024

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Old Town site/sacred sites	Get legal advice on the impact to SRC of the 2018 Land Rights Act.	Done	/	<ol style="list-style-type: none"> 1. SRC took legal advice on the impact of the 2018 Land Rights Act in 2023 to provide guidance on the requirements of this act. 2. As per this counsel, the provisions of the Land Rights Act do not apply during the tenure of the current concession agreement with the Government of Liberia. 3. Accordingly, the existing terms and conditions shall remain in effect until the expiration of the concession period. 	<ol style="list-style-type: none"> 1. The new owner continues to adhere strictly to the guidance provided by its legal advisor. 	Sep. 2023

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