

# Socfin-KCD & Coviphama – Action Plan

UPDATE October 2025



# SOCFIN-KCD & COVIPHAMA – ACTION PLAN – OCTOBER 2025

| ALLEGATIONS                                                      |                                         | ACTIONS                                                                                                                                      | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                       |                                                                                                                                                                         | TIMEFRAME  |     |                  |
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| TOPIC                                                            | FINDING                                 |                                                                                                                                              | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                  | LONG TERM STRATEGY                                                                                                                                                      | INITIAL    | NEW | REASON FOR DELAY |
| Violations of Indigenous Peoples' rights to collective ownership | Founded but not Socfin's responsibility | Continue to communicate the companies' position regarding Bunong people as Indigenous People: through Sustainability reports and internally. | Continuous              | <div>1. Communication is done through ongoing training on FPIC.</div> <div>2. External communication about Bunong people as indigenous people is done through Group's Sustainability report and Group's website</div> | <div>1. Trainings to Managers and responsible deputies to be included in annual plans.</div> <div>2. FPIC process respected during entire activities' development</div> | Continuous | /   | /                |

FPIC: Free, Prior, and Informed Consent

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| ALLEGATIONS                                                      |                                         | ACTIONS                                                                                                                                                                                   | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                        | TIMEFRAME  |     |                  |
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| TOPIC                                                            | FINDING                                 |                                                                                                                                                                                           | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | LONG TERM STRATEGY                                                                                                                                                     | INITIAL    | NEW | REASON FOR DELAY |
| Violations of Indigenous Peoples' rights to collective ownership | Founded but not Socfin's responsibility | Continue implementing specific measures in line with their status, such as supporting and promoting their culture through participation in traditional ceremonies and similar activities. | Continuous              | <div>1. Implementation of specific measures in line with their status is done continuously through participation in traditional ceremonies and similar activities.</div> <div>2. Sponsoring of the 2025 Indigenous People's Day has been planned by the company before the cancellation of the event due to the conflict between Thailand and Cambodia.</div> <div>3. Annual Facebook post about on Indigenous People's day.</div> <div>4. Participation in traditional ceremonies (ex: pig sacrifice on June 6<sup>th</sup> 2025).</div> | <div>1. Inclusion of a chapter in the Stakeholder Engagement plan on specific measures put in place in line with the support and promotion of Indigenous People.</div> | Continuous | /   | /                |

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| ALLEGATIONS                                                                                   |                   | ACTIONS                                                                                                                                                                | STATUS & IMPLEMENTATION |                                                                                |                    | TIMEFRAME                    |     |                  |
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| TOPIC                                                                                         | FINDING           |                                                                                                                                                                        | STATUS                  | MEASURES IMPLEMENTED                                                           | LONG TERM STRATEGY | INITIAL                      | NEW | REASON FOR DELAY |
| Irregularities in the approval process of the concessions (ESIA completion, clearing process) | Partially founded | Continue working with authorities to ensure compliance with the requirements of the Ministry of Environment related to the full EIA (Environmental Impact Assessment). | Started                 | 1. Continuous work and communication with authorities related to the full EIA. | /                  | June 2026 (Depending on RGC) | /   | /                |

ESIA: Environmental and Social Impact Assessment  
EIA: Environmental Impact Assessment  
RGC: Royal Government of Cambodia

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| ALLEGATIONS                              |         | ACTIONS                                                           | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                      | TIMEFRAME |     |                  |
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| TOPIC                                    | FINDING |                                                                   | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                                                                                                    | LONG TERM STRATEGY                                                                                   | INITIAL   | NEW | REASON FOR DELAY |
| Flawed compensation program (Socfin-KCD) | Founded | Continue the implementation of the mediation on related farmland. | Started                 | <div>1. Implementation of the mediation on related farmland is ongoing since 2022 to 2026 with 100% of measures implemented per year.</div> <div>2. Clear process put in place with supporting evidences for each community.</div> <div>3. 2025 activities 100% completed for each communities.</div> <div>4. 2026 community projects currently being requested by community representatives, feedback on requests will be given before year end.</div> | <div>1. Monitor the implementation of the action plan and take appropriate action when needed.</div> | Dec. 2026 | /   | /                |

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| ALLEGATIONS                                                                         |                   | ACTIONS                                                           | STATUS & IMPLEMENTATION |                                                                                                                                       |                                                                                                           | TIMEFRAME  |           |                                                                     |
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| TOPIC                                                                               | FINDING           |                                                                   | STATUS                  | MEASURES IMPLEMENTED                                                                                                                  | LONG TERM STRATEGY                                                                                        | INITIAL    | NEW       | REASON FOR DELAY                                                    |
| Forced evictions due to failure to respect communities' rights to FPIC (Socfin-KCD) | Partially founded | Integrate FPIC principles in all engagements with communities.    | Continuous              | 1. Implementation of the Earthworm Foundation's recommendations on establishment of MoU with communities integrating FPIC principles. | 1. Continual integration of FPIC principles in engagements with communities.                              | Continuous | /         | /                                                                   |
|                                                                                     |                   | Develop and put in place a clear stakeholder engagement strategy. | Started                 | 1. Development and implementation of the stakeholder engagement strategy.                                                             | 1. Discussion and validation of stakeholder engagement strategy during next tripartite committee meeting. | Jun. 2025  | Dec. 2025 | Time for discussion and disclosure with stakeholders underestimated |

MoU: Memorandum of Understanding

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| ALLEGATIONS                                                                         |                   | ACTIONS                                                                                                                                               | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                 | TIMEFRAME  |     |                  |
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| TOPIC                                                                               | FINDING           |                                                                                                                                                       | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                                                                          | LONG TERM STRATEGY                                                                                                                                                                                                              | INITIAL    | NEW | REASON FOR DELAY |
| Forced evictions due to failure to respect communities' rights to FPIC (Socfin-KCD) | Partially founded | Continue the implementation of the outcomes of the mediation process and ensure any grievances related to compensation and land claims are addressed. | Continuous              | <ol style="list-style-type: none"><li>1. Implementation of the outcomes of the mediation process is continuous.</li><li>2. Grievances related to compensation and land claims have been addressed in the Mediation Agreements which are respected by Socfin-KCD with continuous implementation.</li><li>3. Continual implementation and communication on Grievance Procedure to ensure any grievances is addressed.</li></ol> | <ol style="list-style-type: none"><li>1. Assessment of mediation implementation to verify efficiency of the process.</li><li>2. Implementation of an action plan related to the outcomes of the assessment if needed.</li></ol> | Continuous | /   | /                |

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| ALLEGATIONS                                        |         | ACTIONS                                                                                                                                         | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                               |                                                                        | TIMEFRAME |     |                  |
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| TOPIC                                              | FINDING |                                                                                                                                                 | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                          | LONG TERM STRATEGY                                                     | INITIAL   | NEW | REASON FOR DELAY |
| The livelihoods of the Bunong people were impacted | Founded | Conduct a study on the impact of Socfin-KCD and Coviphama operation on local community livelihoods and put in place an appropriate action plan. | Started                 | <div>1. Contact with various organizations in order to identify a suitable organization to conduct this study.</div> <div>2. ToR of the study on the impact of Socfin-KCD and Coviphama operation on local community livelihoods have been established.</div> | <div>1. Monitoring of the implementation of the recommendations.</div> | Dec. 2026 | /   | /                |

ToR: Terms of Reference



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| ALLEGATIONS                                                                               |                   | ACTIONS                                                                                       | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                               | TIMEFRAME |     |                  |
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| TOPIC                                                                                     | FINDING           |                                                                                               | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                                                                                                         | LONG TERM STRATEGY                                                            | INITIAL   | NEW | REASON FOR DELAY |
| Poor working conditions related to transport conditions, working hours, health and safety | Partially founded | Establish a monitoring system to ensure that contractors implement all contract requirements. | Done                    | <div>1. Contracts for contractors are meeting legal requirements.</div> <div>2. Implementation of Work Permits at the starting of work of all contractors.</div> <div>3. Contractor monitoring is conducted by the department engaging the contractors.</div> <div>4. An HSE inspection template was developed for contractors' operations that were not covered in the past (ex: construction).</div> <div>5. Adjustment to HSE inspection frequency.</div> | <div>1. Ongoing control of the implementation of the monitoring system.</div> | Jun. 2025 | /   | /                |

HSE: Health, Safety and Environment.

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| ALLEGATIONS                                                                               |                   | ACTIONS                                                                               | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                       |                                                                                                           | TIMEFRAME |     |                  |
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| TOPIC                                                                                     | FINDING           |                                                                                       | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                  | LONG TERM STRATEGY                                                                                        | INITIAL   | NEW | REASON FOR DELAY |
| Poor working conditions related to transport conditions, working hours, health and safety | Partially founded | Ensure that all contractors' workers are registered to NSSF.                          | Continuous              | <div>1. Implementation of measures to ensure that all contractors' workers are registered to NSSF.</div> <div>2. Verification is conducted for permanent contractors (such as security and construction contractors).</div> <div>3. Preparation of the relevant documentation for new contracts</div> | <div>1. Monitoring of the contractor's workers to control their registration to NSSF.</div>               | Jun. 2025 | /   | /                |
|                                                                                           |                   | Ensure that all security agents go through medical check-ups before starting to work. | Done                    | <div>1. Development of a register comprising the list of security agents with the medical check-ups dates and confirmation before starting to work.</div>                                                                                                                                             | <div>1. Organization of spott checks to verify that security agents are going to medical check-ups.</div> | Jun. 2025 | /   | /                |

NSSF: National Social Security Fund

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| ALLEGATIONS                                                                               |                   | ACTIONS                                                                                                        | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                  |                                                                    | TIMEFRAME |     |                  |
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| TOPIC                                                                                     | FINDING           |                                                                                                                | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                             | LONG TERM STRATEGY                                                 | INITIAL   | NEW | REASON FOR DELAY |
| Poor working conditions related to transport conditions, working hours, health and safety | Partially founded | Work with workers' representatives to find a better approach to reflect their night wage pay in the wage slip. | Done                    | <div>1. Meeting with workers' representatives occurred on February 2025 to find a solution to reflect night wage pay in wage pay slip.</div> <div>2. Payment of night work has been regularized for workers concerned and is reflected in their wage slip.</div> | <div>1. Ongoing collaboration with workers' representatives.</div> | Mar. 2025 | /   | /                |

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| ALLEGATIONS                                                                               |                   | ACTIONS                                                                                                           | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                      |                                                                                                     | TIMEFRAME |     |                  |
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| TOPIC                                                                                     | FINDING           |                                                                                                                   | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                 | LONG TERM STRATEGY                                                                                  | INITIAL   | NEW | REASON FOR DELAY |
| Poor working conditions related to transport conditions, working hours, health and safety | Partially founded | Ensure that overtime of subcontractor workers is paid at the correct rate.                                        | Done                    | <div>1. Creation of a excel monitoring file with details of payment by subcontractor workers showing calculation of overtime at the correct rates.</div> <div>2. Payment of overtime to subcontractor workers.</div> | <div>1. Internal audits to verify the rate paid on overtime.</div>                                  | /         | /   | /                |
|                                                                                           |                   | Ensure the transport conditions of employees are appropriate (protection against sun or rain, appropriate seats). | Done                    | <div>1. Roof has been provided to the transportation of workers with additions of seats.</div>                                                                                                                       | <div>1. Respect of the measures put in place.</div> <div>2. Regular inspection of bus/trucks.</div> | Jun. 2025 | /   | /                |

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| ALLEGATIONS                                                                               |                   | ACTIONS                                                                                                                                                                          | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                       |                                                                                           | TIMEFRAME |     |                  |
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| TOPIC                                                                                     | FINDING           |                                                                                                                                                                                  | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                  | LONG TERM STRATEGY                                                                        | INITIAL   | NEW | REASON FOR DELAY |
| Poor working conditions related to transport conditions, working hours, health and safety | Partially founded | Establish a clear policy regarding the use of motorbikes owned by workers to carry the company's production, considering the following aspects: maintenance, health, and safety. | Done                    | <div><div>1. A Memo has been published on health and safety which and communicated to working staff.</div><div>2. Memo is displayed on notice boards.</div><div>3. Awareness conducted by HSE staff in working camps on the wearing of helmet while using a motorbike.</div><div>4. Motorbikes of tappers have been inspected by the Workshop Department.</div></div> | <div><div>1. Monitoring system to control the compliance to the Company Memo.</div></div> | Jun. 2025 | /   | /                |

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| ALLEGATIONS                                                                               |                   | ACTIONS                                                                                | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                            |                                                                                              | TIMEFRAME |     |                  |
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| TOPIC                                                                                     | FINDING           |                                                                                        | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                       | LONG TERM STRATEGY                                                                           | INITIAL   | NEW | REASON FOR DELAY |
| Poor working conditions related to transport conditions, working hours, health and safety | Partially founded | Review the risk assessment in order to provide appropriate PPE to workers accordingly. | Done                    | <div>1. Risk assessment for the factory is available.</div> <div>2. Formalization of plantation risk assessment for the plantation has been done.</div> <div>3. Workers received appropriate PPE and regular spott checks are conducted by the HSE staff.</div> <div>4. Training of management and staff in charge by external consultant on HIRARC.</div> | <div>1. Regular review of the risk assessment to ensure all risks have been addressed.</div> | Mar. 2025 | /   | /                |

PPE: Personal Protective Equipment  
HIRARC: Hazard Identification, Risk Assessment, and Risk Control

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| ALLEGATIONS                             |                                           | ACTIONS                                                                                                 | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                            | TIMEFRAME |     |                  |
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| TOPIC                                   | FINDING                                   |                                                                                                         | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | LONG TERM STRATEGY                                                                         | INITIAL   | NEW | REASON FOR DELAY |
| Threats and intimidation of communities | Founded; not the responsibility of Socfin | Publicize with external stakeholders the Socfin policy on non-intimidation and respect of human rights. | Done                    | <div>1. A Khmer version of the Code of Conduct has been distributed to external stakeholders.</div> <div>2. Communication on Code of Conduct and Hotline conducted during Tripartite committee.</div> <div>3. Communication materials shared: Khmer Code of conduct booklet distributed to Community representatives and local authorities, information about the hotline displayed at the commune notice board and distributed to Community representatives and local authorities.</div> | <div>1. Ongoing communication of relevant policies and procedures with stakeholders.</div> | Jun. 2025 | /   | /                |

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| ALLEGATIONS                                   |                                      | ACTIONS                                                                                                                           | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                             | TIMEFRAME |     |                  |
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| TOPIC                                         | FINDING                              |                                                                                                                                   | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                                                                | LONG TERM STRATEGY                                                                                                                          | INITIAL   | NEW | REASON FOR DELAY |
| Lack of transparency in the mediation process | Founded; not Socfin's responsibility | Continue to work with communities to clarify deadlines and terms and conditions related to implementing the mediation agreements. | Started                 | <div>1. Implementation of the mediation agreements is ongoing since 2018.</div> <div>2. Development of follow-up register on action plans of mediation agreements to ensure respect of timelines and budget per community.</div> <div>3. The implementation of MoUs between Socfin-KCD/Coviphama and the communities is currently underway, with defined deadlines and clearly outlined terms and conditions.</div> | <div>1. Continue close communication and meetings with communities.</div> <div>2. Put in place a monitoring table for MoU/agreements.</div> | Dec. 2025 | /   | /                |



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| ALLEGATIONS                                   |                                      | ACTIONS                                                                                                                                     | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                               | TIMEFRAME |     |                  |
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| TOPIC                                         | FINDING                              |                                                                                                                                             | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                            | LONG TERM STRATEGY                                                                                                                                                                            | INITIAL   | NEW | REASON FOR DELAY |
| Lack of transparency in the mediation process | Founded; not Socfin's responsibility | Ensure that all complaints raised during the implementation of the mediation outcomes are recorded and addressed properly.                  | Done                    | 1. All complaints raised during the implementation of the mediation outcomes are recorded and addressed properly.                                                                                                                                                                                                                               | 1. Continue to record and address grievances as per Socfin-KCD/Coviphama SOPs.<br>2. Conduct a periodical review of the grievance register and put in place appropriate actions if necessary. | Mar. 2025 | /   | /                |
|                                               |                                      | Work with all the parties involved in the mediation process to extend the removal of the NDA already done for the PHF to the whole process. | Continuous              | 1. Socfin-KCD/Coviphama met on the 12/11/2024 with all the parties involved in the mediation process about the NDA.<br>2. Based on this participatory discussion, communities have expressed their disagreement to extend the removal of the NDA before the completion of the mediation implementation. The Company aligns with their decision. | 1. MoU to be established to ensure requirements from communities are addressed.                                                                                                               | Dec. 2025 | /   | /                |

SOP: Standard Operating Procedure    NDA: Non-Disclosure Agreement    PHF: Plantation d’Hévéa Familiale

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| ALLEGATIONS                                   |                                      | ACTIONS                                                                                                                        | STATUS & IMPLEMENTATION |                                                                                                                                                                                                             |                                                                         | TIMEFRAME  |     |                  |
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| TOPIC                                         | FINDING                              |                                                                                                                                | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                        | LONG TERM STRATEGY                                                      | INITIAL    | NEW | REASON FOR DELAY |
| Lack of transparency in the mediation process | Founded; not Socfin's responsibility | Conduct a periodical review of the implementation of the mediation outcomes and put in place if necessary appropriate actions. | Continuous              | 1. Development of a periodical review and follow-up of the implementation of the mediation outcomes.<br>2. Regular transparent communication about the mediation implementation with relevant stakeholders. | 1. Continuous revision of the implementation of the mediation outcomes. | Continuous | /   | /                |

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| ALLEGATIONS                 |         | ACTIONS                                                                                                                                                                                    | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                           | TIMEFRAME                    |     |                  |
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| TOPIC                       | FINDING |                                                                                                                                                                                            | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | LONG TERM STRATEGY                                                        | INITIAL                      | NEW | REASON FOR DELAY |
| Destruction of sacred sites | Founded | Continue to support communities in the process of formalization of communal land (land title): cut out communal lands from the concession following mediation on communal land agreements. | Started                 | <div>1. Joint demarcation of communal lands inside the concessions with the communities was completed during the mediation on communal lands.</div> <div>2. Ongoing discussions with the Government to redefine the concessions and remove areas identified as communal land, to facilitate the communities' process of registering the land as communal land, following mediation on communal land agreements and maps.</div> <div>3. Process of measurement of the communal lands for obtention of communal land titles by the community already took place in the concessions for one community, with company representatives, community representatives and members and land management officials participating in the field visits.</div> | <div>1. Continue close communication and meetings with communities.</div> | Dec. 2025 (depending on RGC) | /   | /                |

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| ALLEGATIONS                 |         | ACTIONS                                                                                                                                                                                      | STATUS & IMPLEMENTATION |                                                                                                                                                                                                                                     |                                                               | TIMEFRAME  |     |                  |
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| TOPIC                       | FINDING |                                                                                                                                                                                              | STATUS                  | MEASURES IMPLEMENTED                                                                                                                                                                                                                | LONG TERM STRATEGY                                            | INITIAL    | NEW | REASON FOR DELAY |
| Destruction of sacred sites | Founded | Ensure community interests are considered for the protection of gravesites: discuss with communities if they would be willing to improve the current demarcation of the impacted graveyards. | Started                 | 1. Preliminary evaluation of community interests on this matter is in progress.                                                                                                                                                     | /                                                             | Dec. 2026  | /   | /                |
|                             |         | Continue the implementation of the mediation on communal land agreements.                                                                                                                    | Continuous              | 1. Implementation of the mediation on communal land is done in a continuous basis.<br>2. Development of a follow-up file to track any action based on timeline and status.<br>3. Ongoing respect to the implementation action plan. | 1. Continue close communication and meeting with communities. | Continuous | /   | /                |

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