

SAC Action plan

UPDATE FEBRUARY 2026



SAC – ACTION PLAN – FEBRUARY 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			TIMEFRAME		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY
Irregularities in the approval process of the leases and sub-leases agreement	Partially founded	Conduct a thorough review of sub-leases and take necessary steps to address the irregularities identified in consultation with the government.	Done	<ol style="list-style-type: none"> 1. Consultation with the government have been organized to address the irregularities identified. 2. Consultation with experts have been conducted to guide SAC about the legal requirements and steps to be followed to resolve these discrepancies. 3. A thorough review of sub-leases has been conducted by GeoData SL (Ltd), experts recommended by the Government, through the establishment of Land Committees in 2024. 4. 443 land owners have been identified by the Land Committee during the concession survey. 5. Maps identifying land owners' parcels have been created by GeoData SL (Ltd) and validated by communities. 6. Final maps have been signed by the Direct Surveyor and distributed to land owners during the Ceremony of 24/09/2025. 	<ol style="list-style-type: none"> 1. Maintain open communication with communities. 2. Assist (if requested by landowners) to register their land with the Government after validation of the Land Register Act by the government. 	Dec. 2024	Dec. 2025	National administration delay

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY
Consultation, transparency and inclusiveness of landowners in the land acquisition process	Partially founded	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 style="list-style-type: none"> The Action Plan has been implemented in collaboration with the company GeoData SL (Ltd), approved by the Land Commission SL. Landowners' acreages have been identified through the creation of the Land Committee. Annual lease rent for each land owners have been determined, payment strategy review and approval ongoing 	<ol style="list-style-type: none"> Insurance of annual lease rents' payment for each land owners. Assist (if requested by landowners) to register their land with the Government after validation of the Land Register Act by the government. 	Dec. 2024	Apr. 2025	<ol style="list-style-type: none"> Land commissioner passed away in December 2024. Unresolved land conflict between 2 communities.
		Address any claim (related to landowners' identification) that may arise during the implementation of the Action Plan.	Done	<ol style="list-style-type: none"> Land conflicts and claims have been investigated and addressed during the Land Survey conducted by GeoData SL from 2023 to 2024. 	<ol style="list-style-type: none"> 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	Partially founded	Study the possibility of sharing land lease agreements with the Land Commission as part of the process of distributing land titles to landowners.	Done	<ol style="list-style-type: none"> 1. Sub lease agreements have been shared with the Land Commission. 2. Maps identifying land owners' parcels have been created by GeoData SL (Ltd), validated by communities and distributed to land owners during the Ceremony of 24/09/2025. 	<ol style="list-style-type: none"> 1. Provide communities with updates on any potential future changes or renewals to sublease terms. 	Mar. 2025	Dec. 2025	National administration delay

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Inequities in land lease payments	Founded: not SAC's responsibility	Identify landowners and their acreages during the action plan.	Done	1. Landowners and their acreages have been identified.	1. SAC keeps an open dialogue on the identified landowners' acreages during the community meetings.	Dec. 2024	/	/
		Examine with the Law Office the possibility of the company paying land leases directly into landowners' bank accounts.	Continuous	1. Base on the possibility of owning bank accounts, procedure/strategy implemented to get payment to actual landowner individually and communication ongoing for bank account request.	1. Assist (if requested by landowners) to register their land with the Government after validation of the Land Register Act by the government. 2. Engage landowners to explore the possibility of opening a bank account for each landholding family.	Mar. 2025	Continuous	/
		A clear documentation process must be set up to monitor the payment of land lease.	Continuous	1. SAC is maintaining payment receipt for land lease payment from the Local Authority office. 2. Payment register with means of identification and signatories is maintained for each region.	1. Direct payment system in place, upon receipt of all bank details, payment will be through bank accounts	Mar. 2025	Continuous	/

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Crop compensation	Partially founded	Address any claim (related to crops compensation) that may arise during the Action Plan.	Done	1. Land conflicts and claims have been investigated and addressed 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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Documentation compensation process	Founded	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.	Done	<ol style="list-style-type: none"> Step of community engagement for the action plan has been clearly documented through the Land Committee establishment and land owners' consultations. 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". 	<ol style="list-style-type: none"> Monitoring of the availability of the Community engagement report at section chief level. 	Feb. 2025	Nov. 2025	Delays in records sharing from Geo Data.

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Degradation of natural areas and lack access to land for farming	Founded: not only SAC's responsibility but can be considered as an indirect impact of SAC's presence in the landscape	Evaluate the dynamics of the evolution of greenbelts since project implementation.	Continuous	<ol style="list-style-type: none"> Greenbelts have been mapped. Evolution of the greenbelts has been compared to evaluate the dynamics of their size. Analysis of this evolution has been realized and discussed during community meetings. 	<ol style="list-style-type: none"> SAC keeps an open dialogue on the greenbelts' evolution during community meetings. 	Feb. 2025	Continuous	Time underestimated due to logistic reasons (drone pictures).
		Update the customary maps with the communities.		Continuous	<ol style="list-style-type: none"> The update of the 53 customary maps in a participative way has been conducted. Drone pictures of the greenbelts have been completed and amended in the customary maps for validation by communities. Updated copies of the customary maps have been provided to communities. Current update is ongoing and under review, after which it will be distributed to communities. 	<ol style="list-style-type: none"> SAC keeps an open dialogue on the customary mapping during community meetings. 	Jun. 2025	Continuous

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Degradation of natural areas and lack access to land for farming	Founded: not only SAC's responsibility but can be considered as an indirect impact of SAC's presence in the landscape	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 style="list-style-type: none"> 1. Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities. 2. Monitor alternative project implemented to identify areas of improvement. 	Continuous	/	/

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Smallholders oil palm out-grower scheme	Founded	Engage with stakeholders to discuss alternatives to oil palm out-grower.	Done	<ol style="list-style-type: none"> Engagement with stakeholders through community meetings completed and data collected. Meeting with Malen Chiefdom Development Committee to discuss communities' projects. 	<ol style="list-style-type: none"> Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities. Monitor the implementation of all the alternatives activities implemented with the communities. 	Mar. 2025	Jul. 2025	Delays due to the creation of Malen Chiefdom Development Committee.

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Access to drinking water	Partially founded	Carry out a review of the water wells built by SAC in order to implement appropriate corrective measures where possible.	Done	<ol style="list-style-type: none"> 1. A census of all water wells has been conducted to identify the priority needs in term of availability of drinking water. 2. SAC has appointed a construction team in charge of community' water wells maintenance and repairs. 	<ol style="list-style-type: none"> 1. Annual planning of a water wells census to ensure verification of the availability of drinking water. 2. Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities. 	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 style="list-style-type: none"> 1. Establishment of a Company standard for the construction of hand pump to guarantee quality of each well. 2. Development of a monitoring system for the water infrastructures. 	<ol style="list-style-type: none"> 1. Inspection of the water wells infrastructure to ensure respect of the Company quality standards. 2. Continuous monitoring of the water wells quality. 	Jul. 2024	/	/

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Water and waste management	Partially founded	Define a distance limit to be respected with communities/quarters and blocks receiving EFBs*.	Done	<ol style="list-style-type: none"> SAC has defined a distance limit to be respected with communities/quarters and blocks receiving EFBs. Communication has been made by SAC to communities on the defined distance. SAC has defined a map for EFB application with prohibited areas. 	<ol style="list-style-type: none"> Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities. Monitor regularly the implementation of the map for EFB application with prohibited areas. 	Jun. 2024	/	/
		Regularly maintain culverts to prevent flooding.	Continuous	<ol style="list-style-type: none"> SAC has a road maintenance plan which includes the maintenance of culverts to prevent flooding. SAC has put in place a monitoring of culverts. 	<ol style="list-style-type: none"> Continuous monitoring of culverts along the main road. 	Continuous	/	/

* EFB: Empty Fruit Bunch

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Water and waste management	Partially founded	Ensure appropriate treatment and traceability for different types of waste.	Done	<ol style="list-style-type: none"> SAC has a waste management plan comprising the types of waste per origin and the details appropriate treatment. SAC waste management plan is audited during RSPO* and ISO* annual audits. Recyclers audits are also conducted to ensure appropriate treatment of all types of waste. 	<ol style="list-style-type: none"> 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 style="list-style-type: none"> SAC has conducted further analysis to determine the origin of phosphate compounds in surface water in order to take appropriate action. SAC has engaged biodiversity experts to analyze the origin of phosphate compounds in surface water which has led to a series of recommendation translated into an action plan. 	<ol style="list-style-type: none"> Implementation and monitoring of the action plan. 	Jul. 2024	/	/

* RSPO: Roundtable on Sustainable Palm Oil

* ISO: International Organization for Standardization

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Sexual harassment and gender-based violence	Founded	Provide enhanced training for Gender Committee.	Done	<ol style="list-style-type: none"> 1. Trainings have been provided to Gender Committee members through the engagement and support of external experts. 2. Gender Committee training is included into the annual training calendar. 	<ol style="list-style-type: none"> 1. Continuous trainings to Gender Committee. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	May 2024	/	/
		Promote inclusivity within the Gender Committee by including a representative for each department.	Continuous	<ol style="list-style-type: none"> 1. Inclusivity of the Gender Committee has been promoted through the inclusion of representatives for each department, contractors' companies and community leaders. 2. The Gender Committee members has been updated on 31/01/2025 and displayed on notice boards. 	<ol style="list-style-type: none"> 1. Ongoing oral and visual communication on the Gender Committee existence and roles. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	May 2024	Continuous	/

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Sexual harassment and gender-based violence	Founded	Strengthen training programs on sexual harassment and gender-based violence that covers all levels of workers.	Continuous	1. Training programs on sexual harassment and gender-based violence have been strengthened to cover all levels of workers.	1. Continuous trainings on Gender Committee. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Dec. 2024	Continuous	/
		Establish budget to strengthen the Gender Committee.	Done	1. The Gender Committee has been strengthened with the definition of a program of activities and appropriate budget.	1. Implementation of a program to conduct Gender Committee activities. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Nov. 2024	/	/
		Strengthen the Gender Committee: by hiring additional in-house qualified staff or studying the possibility of collaborating with an external body.	Done	1. Engagement with EF* has been made to advise on external bodies that have assisted SAC as expert on gender issues.	1. Continuous trainings to Gender Committee. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Dec. 2024	Mar. 2025	Assessment to be carried out by top management to study the need to appoint a full time.

* EF: Earthworm Foundation

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Sexual harassment and gender-based violence	Founded	Ensure that all cases of Sexual Harassment (SH) and Gender-Based Violence (GBV) are reported to the Gender Committee.	Continuous	1. The Gender Committee is responsible to handle all cases of Sexual Harassment.	1. Continuous trainings to Gender Committee. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Dec. 2024	Continuous	/
		Establish a hotline (as part of an effective grievance system) for reporting sexual harassment at the workplace.	Done	1. Contact of each representative is maintained and posted in all department.	1. Continuous engagement on possibility to have a hotline number. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	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.	1. Continuous oral and visual communication on the hotline number. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Jun. 2024	/	/

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Air pollution	Partially founded	Ensure communities along the main road have speed bumps.	Done	<ol style="list-style-type: none"> SAC has a road maintenance plan which includes the provision of speed bumps per community with sign boards along the main road. SAC has put in place a monitoring of the speed bumps creation to ensure they are refreshed at regular frequency. 	<ol style="list-style-type: none"> Continuous monitoring of the speed bump along the main road. 	May 2025	/	/
		Train drivers from the company on road safety.	Done	<ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> Continuous respect to training calendar including road safety trainings to drivers. 	Dec. 2024	/	/

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Air pollution	Partially founded	Continue to regularly sensitize road users on road safety.	Continuous	<ol style="list-style-type: none"> Road safety sensitization are organized on regular basis. Road safety awareness are included in the HSE* minutes among workers and communities to ensure road users are sensitized. Radio communication called "Socfin Hour" is conducted on road safety. 	<ol style="list-style-type: none"> Continuous respect to training calendar including road safety awarenesses to road users. 	Continuous	/	/	
		Continue recording and investigating all road accidents.		Continuous	<ol style="list-style-type: none"> Road accidents records are updated at all times. Investigation reports are conducted with inclusion of root causes analysis to understand any accident and develop corrective measures to avoid occurrence. 	<ol style="list-style-type: none"> Continuous recording and investigating all road accidents. 	Continuous	/	/
		Continue to record road consumption of water.			Continuous	<ol style="list-style-type: none"> Water consumption is recorded during application on road to reduce dust emissions. 	<ol style="list-style-type: none"> Continuous record of water consumption. 	Continuous	/

* HSE: Health, Safety, and Environment

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Employment conditions, work safety and labor rights violations	Partially founded	Provide a medical check to all workers irrespective of their contracts and nature of work.	Continuous	<ol style="list-style-type: none"> 1. Medical check ups are conducted to all workers irrespective of their contracts and nature of work. 2. The monitoring file has been updated to include an automatic follow-up of the check-up date. 3. Medical check ups are conducted on a continuous basis. 	<ol style="list-style-type: none"> 1. Organization of spot inspections to verify respect of the procedure among the working staff. 	Feb. 2025	Continuous	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 style="list-style-type: none"> 1. Communication on the Employment Act 2023 has been conducted to describe the content of the act. 2. Monitoring template has been designed to ensure conformity of the working hours at the palm oil mill. 	<ol style="list-style-type: none"> 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 style="list-style-type: none"> 1. Transport allowance has been revised for workers and included inside their monthly pay slips. 	<ol style="list-style-type: none"> 1. Organization of spot inspections to verify payment of the transport allowance based on the new rate. 	Mar 2024	/	/

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Employment conditions, work safety and labor rights violations	Partially founded	Review and implement recruitment and hiring procedures types of workers (seasonal, contractors, etc.).	Done	<ol style="list-style-type: none"> 1. The recruitment and hiring procedure has been updated per type of workers. 2. Awareness and sensitization are conducted to inform workers about the updated procedure. 3. For new recruitment, a description will be included in the announcement and induction. 	<ol style="list-style-type: none"> 1. Continual awareness of the recruitment procedure. 2. Monitoring of the induction program records for new workers. 	Sep. 2024	Jul. 2025	Restructuration of HR Department and availabilities of resources.
		Review and update the workforce spreadsheet and include workers ages and date contract signed.	Done	<ol style="list-style-type: none"> 1. The workforce spreadsheet has been updated to include workers ages and date of contract signed. 	<ol style="list-style-type: none"> 1. Continual awareness of the recruitment procedure. 	Jun. 2024	/	/

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Employment conditions, work safety and labor rights violations	Partially founded	Study the possibility of collecting worker’s community origin information for new recruit.	Done	1. Update of the workforce spreadsheet to include the worker's community origin information at his will.	1. Continual awareness of the recruitment procedure.	May 2025	/	/
		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	1. The list of barray built by SAC has been created to ensure recording of the presence of notice boards.	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	Founded: not SAC's responsibility	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	Founded: not SAC's responsibility	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 style="list-style-type: none"> Promotion of the policy on the freedom of association has been conducted with publication in the Chiefdom authorities. Public affirmation has been done that all stakeholders are welcome in SAC's concession. 	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> The Company's security strategy with Chiefdom Committee, CSOs and relevant stakeholders has been revised. 	<ol style="list-style-type: none"> Ensure that the company security approach is fair, transparent, and inclusive of community members. Regular engagement of community members on security concerns and updates. 	Jan. 2025	Sep. 2025	Global re-organization to be done in collaboration with the Grievance Committee.

* CSO: Civil Society Organization

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Buffer zones	Founded	Continue to implement the remediation and compensation plan.	Continuous	<ol style="list-style-type: none"> The remediation and compensation plan is implemented since 2017, its implementation is continuous. Monitoring of this plan is available and audited every 2 years by an external biodiversity agency. 	<ol style="list-style-type: none"> Continuous implementation of the remediation and compensation plan. 	Continuous	/	/
		Sensitize communities on the purpose of the riparian areas.	Done	<ol style="list-style-type: none"> Sensitization to communities on the purpose of riparian areas is ongoing through meetings, sensitization programs and radio communications. 	<ol style="list-style-type: none"> 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 agricultural land on the communities' right to food	Founded	Engage the Ministry of Lands/Agriculture to assess the food security in Malen Chiefdom.	Done	<ol style="list-style-type: none"> The Ministry of Lands/Agriculture has been engaged to assess the food security in Malen Chiefdom. Recommendations have been identified and translated into an action plan. 	<ol style="list-style-type: none"> Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities. Monitor the implementation of the action plan. 	Jan. 2025	Mar. 2025	Slow responses from Ministry of agriculture
		Continue to engage with community members on alternative livelihoods projects.	Continuous	<ol style="list-style-type: none"> Engagement with stakeholders is ongoing through the Social and Grievance Committee meetings organized on the last Friday of each month. Alternative livelihoods projects are discussed with communities. 	<ol style="list-style-type: none"> Definition of an updated engagement strategy that guarantee open communication, transparency, meetings minutes and annual agenda validated by communities. Monitor the implementation of alternative livelihoods projects to identify areas of improvement. 	Continuous	/	/

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Analysis of the impact of the loss of agricultural land on the communities' right to food	Founded	Finalize participatory customary mapping with communities.	Continuous	<ol style="list-style-type: none"> The update of the 53 customary maps in a participative way has been conducted. Drone pictures of the greenbelts have been completed and amended in the customary maps for validation by communities. Updated copies of the customary maps is ongoing as well as distribution 	<ol style="list-style-type: none"> SAC keeps an open dialogue on the customary mapping during community meetings. 	Jun. 2025	Continuous	Time underestimated due to logistic reasons (drone pictures)
		Update the identification criteria of vulnerable people and update the list per community.		Done	<ol style="list-style-type: none"> Identification criteria of vulnerable people has been updated in the instruction IN-CL-009. The list of vulnerable people per community has been updated based on the revised identification criteria. 	<ol style="list-style-type: none"> Continuous usage of the updated criteria for identifying vulnerable people. 	Mar. 2025	/

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