

Evaluation of implementation of “Deep dive” action plan by Liberian Agricultural Company (LAC)

Closing meeting – 21 March 2026



PROFOREST – ASSESSMENT TEAM



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OVERVIEW & ASSESSMENT PROCESS

OVERVIEW

Objective

- Verify measures implemented by LAC to address allegations and if they are in line with recommendations made by Earthworm Foundation (EF*).

Scope

- LAC's operations.
- EF's investigation of allegations against LAC.
- Actions and measures in LAC action plan.

* EF: Earthworm Foundation

ASSESSMENT PROCESS

- Development of checklist of follow up information.
- Consultations/interviews.
- Field visits and observations.
- Document review.
- Analysis and reporting.



FIELD WORKPLAN

Date	Activity
Mon 16 Mar 2026	• Proforest team travels by road to LAC.
Tue 17 Mar to Thu 19 Mar 2026	• Opening meeting (Tuesday morning). • Document review. • Interviews with management and key staff (HR*, Community Relations, Gender committee etc.), workers, including contractors and their workers, smallholders, middle-men, etc. • Consultations with selected communities and public schools (specific communities to be agreed during opening meeting). • Site visits (identified sacred sites, hand pumps etc.). • Interview with partners (CSOs**, Ministry of Agriculture, National Bureau of concessions, Liberia National Police, Plant Protection Department, etc.).
Fri 20 Mar 2026	• Mop up and preparation for closing meeting.
Sat 21 Mar 2026	• Closing meeting (morning). • Proforest team departs.

* HR: Human Resources

** CSO: Civil Society Organization



CONTEXT OF DEED DIVE INVESTIGATION



- From 2023 to the end of 2025, Socfin Group mandated Earthworm Foundation (EF) to conduct independent investigations, including field missions, to verify allegations raised by NGOs.
- Following each mission, EF published an investigation report outlining its findings and recommendations on its website.
- Based on these reports, Socfin developed action plans to address each identified issue. These action plans were updated on a quarterly basis and made publicly available on the Socfin website.
- In January 2026, Socfin partnered with Proforest to independently verify, through field visits, the alignment and implementation of the actions set out in these action plans, providing an additional independent external perspective.

* EF: Earthworm Foundation

LAC – PROFOREST VERIFICATION – MARCH 2026

LAC – KEY ELEMENTS

Earthworm Foundation

September 2023: mission
June 2024: publication of the report

Jul. 2024 – Dec. 2025

Socfin publications of action plans

Mar. 2026

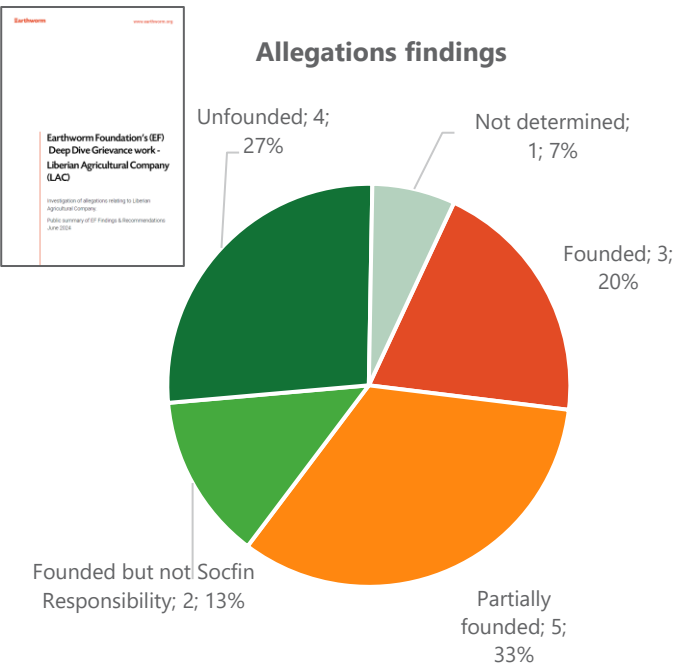
Proforest mission

15 allegations

36 actions

36 measures verified*

Allegations findings



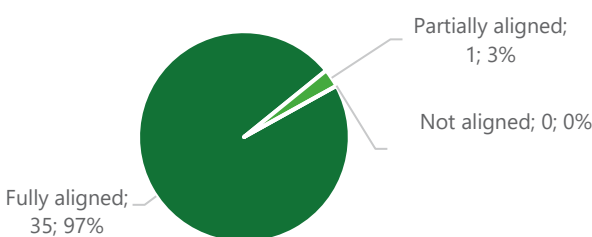
- #1: July 2024
- #2: November 2024
- #3: February 2025
- #4: June 2025
- #5: September 2025
- #6: December 2025 → **closing of all the actions**

LAC – ACTION PLAN – DECEMBER 2025									
ALLEGATIONS		ACTIONS		STATUS & IMPLEMENTATION		TIMESCALE			
TOPIC	FINDING	ACTIONS	STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY	
Insufficient engagement with communities who reside and depended on the land during the land expansion in 2023	Partially founded	Develop SCOP for community engagement that respects FPIC principles	Done	1. SCOP for community engagement that respects FPIC principles has been developed	1. Ongoing communication on the SCOP to communities	Dec. 2024	/	/	
		Develop participatory mapping SCOP and implement	Continuous	1. SCOP for participatory mapping has been developed	1. Inclusion of a chapter on participatory mapping in the community meeting agenda	Dec. 2024	Continuous	/	
		Develop a communication work plan for the implementation of the stakeholder engagement strategy	Continuous	1. LAC has updated its stakeholder engagement strategy including a work plan for its implementation	1. Implementation of the stakeholder engagement strategy	Mar. 2025	Dec. 2025	Time necessary for communication engagement and implementation	

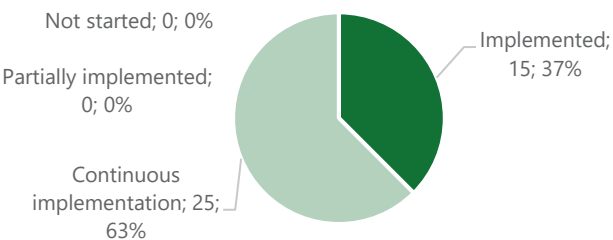
* SCOP: Standard Operating Procedure
* FPIC: Free, prior and informed consent

10/2025 LAC – Action Plan – Update 6 3

Alignment of measures



Status of implementation of measures



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Verification of measures implemented

 **Implemented:** Reported measure is confirmed to be fully implemented.

 **Partially implemented:** Reported measure has been partially or fully implemented but does not fully address issue.

 **Continuous implementation:** Reported measure is still being implemented.

 **Not started:** Reported measure is planned, but yet to be implemented.

Alignment implemented measures with EF recommended actions

 **Fully aligned**

 **Partially aligned**

 **Not aligned**

LAC – PROFOREST VERIFICATION – MARCH 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003	Partially founded	Develop SOP* for community engagement that respects FPIC** principles.	Done	1. SOP for community engagement that respects FPIC principles has been developed.	1. Ongoing communication on this SOP to communities.	Fully aligned	Implemented	
		Develop participatory mapping SOP and implement.	Continuous	1. SOP for participatory mapping has been developed. 2. Implementation of the procedure through the realization of participatory mapping with communities.	1. Inclusion of a chapter on participatory mapping in the community meeting agenda.	Fully aligned	Continuous implementation	
		Develop a comprehensive work plan for the implementation of the stakeholder engagement strategy.	Continuous	1. LAC has updated its stakeholder engagement strategy including a work plan for its implementation. 2. LAC has developed external reports on its community activities.	1. Implementation of the stakeholder engagement Strategy.	Fully aligned	Continuous implementation	A work plan template has been included in the Stakeholder Engagement Strategy. However, at the time of the assessment, there was no evidence of a work plan implemented in accordance with the template.

* SOP: Standard Operating Procedure

** FPIC: Free, prior and informed consent

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ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003	Partially founded	Update existing program for LAC’s support for education, taking into account community needs. Clarify LAC’s role and communicate to communities.	Done	1. LAC has updated its existing education support program to take into account community needs: example of Zondo Public School. 2. The role of LAC in the process of education supporting program has been clarified and communicated through community meetings.	1. Continuous communication with communities.	Fully aligned	Implemented	

LAC – PROFOREST VERIFICATION – MARCH 2026

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003	Partially founded	Update the external grievance management process: SOP, sensitizations with communities, implementation with trackers ensuring the capture of the status and follow up of all grievances up to resolution.	Continuous	1. To ensure the efficiency of its communication, LAC has collected the lists of community leaders for all communities. 2. SOP on external grievance management has been updated. 3. Revised SOP has been communicated to communities through awareness programs and information displayed on notices boards. 4. The tracking system has been updated to ensure the capture of the status and follow-up of grievances up to resolution.	1. Implementation of the updated grievance mechanisms with assessment on its efficient usage.	Fully aligned	Continuous implementation	A list of community leaders was available and reviewed. Some inaccuracies were identified in the list; for example, the town chief for Zardo-boe was incorrectly listed. Some communities' members indicated that they were not aware of the process for handling grievances. Nevertheless, a local grievance register was available and reviewed as part of the assessment.

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Insufficient engagement with communities who resided and depended on the land during the land expansion in 2003	Partially founded	Establish MoUs* with communities documenting what has been agreed and how agreements will be implemented.	Continuous	1. LAC has established MoU's with communities through a participatory process. 2. These MoU comprises details on agreements defined and their implementation.	1. Follow-up of the implementation of the MoUs.	Fully aligned	Continuous implementation	Implementation has been carried out in all communities that have provided their consent.

* MoU: Memorandum of Understanding

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Physical relocation	Founded	If further expansion is planned, develop relocation plan according to international requirements and implement in case of any future development.	Done	1. LAC has no plan for expansion.	/	Fully aligned	Implemented	

LAC – PROFOREST VERIFICATION – MARCH 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
			STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
TOPIC	FINDING					ALIGNMENT	STATUS	
Destruction of sacred sites and grave yard	Partially founded	Finalize the process of graves/ graveyards identification and set up a management plan with communities (activities, roles, responsibility, monitoring). Get a written document signed by the communities.	Done	1. SOP for participatory mapping has been developed with management plan including activities, roles, responsibility and monitoring. 2. LAC has finalized the process of graves/ graveyards identification in April 2025.	1. Inclusion of a chapter on Participatory Mapping in the community meeting agenda. 2. Establishment of MoU with communities with details on agreements and their implementation.	Fully aligned	Implemented	During the assessment, Klaryeayee Town confirmed that graveyards within their community had been identified and mapped. However, community representatives also stated that graves located at their former settlement had not yet been identified. LAC provided meeting notes as evidences demonstrating that Klaryeayee Town had not raise this concern during the graveyard identification and mapping exercise, nor during subsequent community consultation meetings. It is therefore recommended that LAC engage further with the community to assess and address this newly raised concern.

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Compensation is either insufficient or not existing	Founded, but not LAC's responsibility	Compile summary of all who were entitled to compensation from LAC and the Government.	Done	1. The summary of individuals entitled to compensation from LAC and Government has been finalized.	/	Fully aligned	Implemented	
		Compile summary of all who have received crop compensation.	Done	1. The summary of individuals who have received crop compensation has been finalized.	/	Fully aligned	Implemented	
		Engage the Government (through National Bureau of Concession for example) to assess pending payment/ compensation options (deduction of taxes, etc.).	Done	1. LAC has engaged the Government through the Ministry of Agriculture with reference to the assessment of crop compensation payment.	1. Continuous engagement with Government on this matter.	Fully aligned	Implemented	

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Compensation is either insufficient or not existing	Founded, but not LAC's responsibility	Once the Government has completed the assessment of pending payment/compensation options, engage the communities in collaboration with the Government and local CSOs* to validate and pay pending Government compensation.	Continuous	1. LAC has engaged the Government with reference to the assessment of pending crop compensation payment. 2. Engagement with the Government is ongoing to progress on the pending payment/compensation options. 3. Letters and meeting records between LAC and the Government are available.	1. Continuous engagement with Government on this matter.	Fully aligned	Continuous implementation	

* CSO: Civil Society Organization

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Sexual harassment and gender-based violence	Founded	Develop and implement policies on sexual harassment and GBV that covers all levels of workers, including long-term and short-term workers.	Continuous	1. LAC has developed policies on sexual harassment and GBV that covers all levels of workers, including long-term and short-term workers.	1. Inclusion of a chapter on sexual harassment in the community meeting agenda. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Implemented	There was evidence of training and awareness-raising activities. However, these efforts should continue to ensure that a greater proportion of workers understand and comply with the policy.
				2. Training and awareness programs have been organized on these policies to ensure they are understood and respected.			Continuous implementation	

* GBV: Gender-Based Violence

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Sexual harassment and gender-based violence	Founded	Develop safe and confidential reporting mechanisms for workers to report incidents of sexual harassment or GBV and ensure that there are sufficient resources available to investigate and respond to complaints.	Done	1. LAC has developed a hotline which is a safe and confidential reporting mechanisms to report incidents of sexual harassment or GBV. 2. Additional resources have been allocated to investigate and respond to complaints.	1. Use of the hotline. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Implemented	

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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Sexual harassment and gender-based violence	Founded	Provide regular awareness and training for all employees, contractors, and contract workers on the sexual harassment policy and procedures for reporting incidents of sexual harassment and GBV.	Continuous	1. Training and awareness programs have been provided to employees, contractors and contract workers on the sexual harassment policies and procedures. 2. Annual training plan includes sexual harassment training to ensure ongoing communication and awareness. 3. A description of the sexual harassment and gender policies have been included in the induction program for all new employee and contractors.	1. Inclusion of the Sexual Harassment and Gender Committee Policy in the training plan 2025. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS					
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Sexual harassment and gender-based violence	Founded	Provide all necessary logistical support to the Gender Committee to enable them to reach and cover effectively all workers' villages and schools within the plantations & LAC.	Continuous	1. LAC ensures logistic support to the Gender Committee. 2. LAC has organized a workshop on sexual harassment to cover effectively all workers' village. 3. LAC is providing logistic supports to the Gender Committee to ensure their presence among communities.	1. Gender Committee improvement with representatives in department and villages. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation						
		Establish a hotline for reporting sexual harassment.		Continuous					1. LAC has established a hotline for reporting sexual harassment and other confidential claims.	1. Inspection on the use of this hotline is ongoing. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Implemented	Training and awareness-raising on sexual harassment, including the use of the grievance hotline, should be further strengthened. During the assessment, it was noted that some workers and community members were not aware of the existence of this reporting mechanism.
									2. Trainings on this hotline have been organized to various areas.			Continuous implementation	

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Sexual harassment and gender-based violence	Founded	Put in place pictorial communication warning signs within the plantation that indicate zero tolerance of sexual harassment and corruption.	Done	1. LAC has displayed pictorial communication warning signs within the plantation indicating zero tolerance of sexual harassment and corruption.	1. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Implemented	

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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Reprisals, threats, and intimidation of activists	Founded, but not LAC's responsibility	Discuss with communities' representatives the best ways to handle common security incidents, especially rubber theft and cup theft.	Continuous	1. To ensure the efficiency of its communication; LAC has verified the lists of communities' representatives for all communities. 2. Discussions on handling methodology for common security incident is integrated during community meeting agenda.	1. Continue to monitor the methodology of handling common security incidents and adapt as needed.	Fully aligned	Continuous implementation	There are some communities for which LAC is yet to verify the list of representatives and conduct meetings during which the methodology for handling security incidents will be discussed.
		Share information with communities on law related to penalties for rubber theft – PSU* will be involved with Cluster community leadership to disseminate information about laws.	Continuous	1. LAC has updated its community meetings form to include a chapter on law related to penalties for rubber theft. 2. PSU have been involved with Cluster community leadership to disseminate information about laws.	1. Continuous communication sharing with communities with the revised community meeting form.	Fully aligned	Continuous implementation	

* PSU: Police Support Unit

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			STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
TOPIC	FINDING					ALIGNMENT	STATUS	
Reprisals, threats, and intimidation of activists	Founded, but not LAC's responsibility	Carry out training on human rights and no intimidation for LNP* operating in LAC's premises and for LAC security guards.	Continuous	1. Training and awareness programs on human rights and no intimidation for LNP have been conducted in November 2024 and January 2025.	1. Monitor the effectiveness of the trainings.	Fully aligned	Continuous implementation	Evidence of attendance registers for these awareness-raising sessions was available. However, the documentation could be strengthened by systematically recording key information such as the date of the awareness/training, topics discussed, and the name of the facilitator.

* LNP: Liberia National Police

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Restriction of movement	Partially founded	Develop and implement policy on restriction/ regulation of movement, train security guards on the policy.	Continuous	1. LAC has developed and implemented a policy on restriction/regulation of movement. 2. Trainings to security guards on the policy have been organized.	1. Inclusion of a chapter on restriction/ regulation of movement policy in the community meeting agenda.	Fully aligned	Continuous implementation	LAC has a policy on restriction/regulation of movement. However, the training records reviewed do not indicate the months in which the trainings were conducted, as stipulated under section 7 (Training) of the policy.
		Conduct further investigations with towns related to requests for bribes from security guards, in order to set up a participatory approach to settle disputes.	Done	1. Investigation has been conducted in 2024 by the PPD* regarding the request for bribes from security guards. 2. LAC has conducted trainings to security guards on its policy on restriction/regulation of movement.	1. Awareness program on this policy are conducted on a monthly basis on all access points of the plantation.	Fully aligned	Implemented	
		Carry out awareness-raising with communities on the policy. Radio awareness already being done.	Continuous	1. Awareness-raising on the policy have been carried out to reach all communities.	1. Ongoing radio awareness on this policy.	Fully aligned	Continuous implementation	Some communities are yet to be sensitized on the policy.

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Access to drinking water	Partially founded	Improve renovation and construction of hand pump by hiring qualified companies.	Continuous	1. LAC has improved renovation and construction of hand pumps with continuous evaluation of the quality criteria in participation with communities. 2. Qualified companies have been hired for the hand pump construction. 3. A quality control have been added in the technician contracts. 4. LAC supervises the construction of hand pump to ensure quality of the process. 5. All materials used for the hand pumps are from LAC stores to ensure highest quality.	1. Monitoring visits on newly constructed hand pumps to assess the quality of the hand pumps.	Fully aligned	Continuous implementation	Evidence was available of LAC's involvement in the renovation and construction of hand pumps. Construction activities are supervised by LAC, which also provides the necessary materials. LAC further explained that, based on an agreement with the National Bureau of Concession, an MSP* group was formed. Contractors were then selected through this MSP group. This decision was made for the MPS community as a way of providing livelihood for community members who will be hired by these companies.

*MSP: Multi Stakeholder Platform

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Access to drinking water	Partially founded	Put in place a monitoring system for hand pumps and implement. Train community dwellers to handle and trouble shoot minor repairs.	Continuous	1. Monitoring system for hand pumps has been put in place in close collaboration with communities. 2. Engagement of chlorination programs by LAC to ensure maintenance of the wells.	1. Inclusion of a chapter on hand pumps quality and monitoring in the community meeting.	Partially Aligned	Continuous implementation	There is no measure on training community dwellers to handle and trouble shoot minor repairs.
		Assess communities' drinking sources and establish a phased priority program to provide safe drinking water for communities.	Continuous	1. LAC has conducted an assessment on communities' drinking sources with a census by town. 2. LAC conducts annual census to assess and established the priority needs in consultation with communities.	1. Monitor the implementation of the program.	Fully aligned	Continuous implementation	The assessment captures, name of community, population, number of pumps, etc. However, the document was not dated making it difficult to ascertain the year the assessment was conducted.

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Poor employment conditions, work safety and labor rights violations of subcontracted workers	Partially founded	Document workers' community of origin and give priority and preference to surrounding communities.	Continuous	1. Worker's community of origin is recorded and documented in personal files. 2. LAC ensures that at equal skills/competences, preference is given to surrounding communities.	1. Continual implementation of the improved measures.	Fully aligned	Continuous implementation	
		Document all workers irrespective of contracts or jobs.	Continuous	1. Documentation on workers are compiled and recorded in HR Department irrespective of their type of contracts. 2. Monitoring of the measures implemented and availability of documents is conducted.	1. Constant ordering and record of workers' document.	Fully aligned	Continuous implementation	

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Poor employment conditions, work safety and labor rights violations of subcontracted workers	Partially founded	Ensure all workers irrespective of the type of contract are paid at least the minimum wage in accordance with the Decent Work Act of 2015.	Continuous	1. Monitoring system to control legal requirements is in place. 2. Evidences of contracts paid above minimum wage for each type of worker.	1. Maintenance of the monitoring system in place.	Fully aligned	Continuous implementation	

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Poor employment conditions, work safety and labor rights violations of subcontracted workers	Partially founded	Supply tools and PPE* to all workers free of charge and monitor their use.	Continuous	1. Realization of a risk assessment to ensure identification of risks and appropriate PPE per operation. 2. Finalization and validation of the PPE matrix. 3. Field inspection to verify PPE supplied free of charge. 4. Interview with workers and contractors to verify respect of the procedure in place. 5. HSE** trainings and Inductions on work safety and PPE free of charge.	1. Ongoing monitoring system and surveillance on contractors' compliance to LAC requirements.	Fully aligned	Continuous implementation	

* PPE: Personal Protective Equipment

** HSE: Health, Safety, and Environment

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Poor employment conditions, work safety and labor rights violations of subcontracted workers	Partially founded	Reinforce the monitoring system of subcontractors with regular inspections of their operations to ensure that the responsible management policy is being implemented- Radio jingles, awareness meeting with contractor heads.	Continuous	1. LAC has reinforced its monitoring system on subcontractors with regular inspections. 2. Radio announcements are conducted. 3. Reinforcement of the contractors' contract including compliance to Socfin Responsible Management Policy.	1. Ongoing monitoring system and surveillance on contractors' compliance to LAC requirements.	Fully aligned	Continuous implementation	

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Abuse from middlemen purchasing from smallholders	Founded	Develop and implement a comprehensive smallholder strategy and approach that includes SOPs and policies for how middlemen deal with smallholders.	Done	1. LAC has developed and implemented a comprehensive smallholder strategy and approach that includes SOPs and policies for how middlemen deal with smallholders.	1. Awareness programs within the Local Rubber Purchase Department on the content of this procedure. 2. Monitor the implementation of the program.	Fully aligned	Implemented	
		Conduct investigations into all bribes reported against agents, security guards and Quality Assurance team and take appropriate disciplinary action.	Continuous	1. Investigation has been conducted in 2024 by the PPD regarding the request for bribes from agents and security guards. 2. Record, management and resolution of claims from farmers are logged in. 3. Warning and sanction have been given for unwholesome practice towards smallholders.	1. Monitoring of respect to procedure in place.	Fully aligned	Continuous implementation	The investigation report relating to the 2024 case was not made available during the assessment. However, an investigation report dated 2025 was provided and reviewed.

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Food insecurity	Undetermined	Finalize participatory mapping with communities to assess whether or not they have sufficient farmland.	Continuous	1. Procedure for participatory mapping has been developed. 2. The procedure is communicated and implement through the realization of participatory maps with communities based on their wish and availabilities.	1. Inclusion of a chapter on participatory mapping in the community meeting agenda.	Fully aligned	Continuous implementation	
		Conduct a food security assessment and design, implement, and monitor a food security strategy based on its results.	Continuous	1. LAC has conducted a food security assessment during the participatory mapping process. 2. This maps are available and shows the location of farm lands (i.e. cassava, rice, plantain, cocoa, oil palms, etc.) for community dwellers.	1. Ensure monitoring of the findings of the assessment.	Fully aligned	Continuous implementation	

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