

Evaluation of implementation of “Deep dive” action plan by Socapalm - Dibombari

Closing meeting – 8 April 2026



PROFOREST – ASSESSMENT TEAM



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Team Member



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Team Member



OVERVIEW & ASSESSMENT PROCESS

OVERVIEW

Objective

- Verify measures implemented by Socapalm Dibombari to address allegations and evaluate their alignment with recommendations made by EF*.
- Assess effectiveness of measures implemented.

Scope

- Socapalm Dibombari's operations.
- EF's investigation of allegations against Socapalm Dibombari.
- Actions and measures in Socapalm Dibombari action plan (updated March 2026).

* 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
Sun 5 Apr 2026	• Proforest team arrives in Douala and travels by road to Dibombari.
Mon 6 April 2026	• Opening meeting (Monday morning). • Document review. • Interviews with management and key staff (Gender Committee, Community Relations, Sustainability team, G4S, Africa Security, CVV), workers.
Tue 7 Apr 2026	• Consultations with selected communities (Nkende, Souza, Bomono Gare, Mbonjo I). • Visits to some water infrastructure sites in Bomono Gare, Souza, Nkende.
Wed 8 Apr 2026	• Mop up and preparation for closing meeting (morning). • Closing meeting (afternoon). • Proforest team departs for Edéa site.



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.

SOCAPALM DIBOMBARI – PROFOREST VERIFICATION – APRIL 2026

SOCAPALM DIBOMBARI – KEY ELEMENTS

Earthworm Foundation

May 2023: mission
July 2023: publication of the report

Jul. 2024 – Feb. 2026

Socfin publications of action plans

Apr. 2026

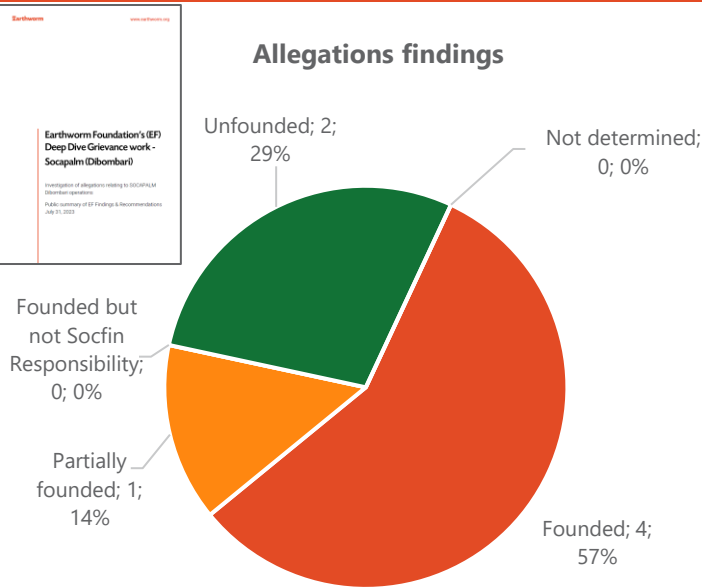
Proforest mission

7 allegations

25 actions

25 measures verified

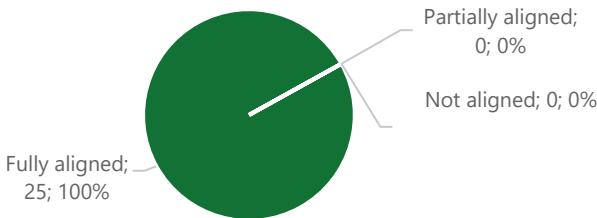
Allegations findings



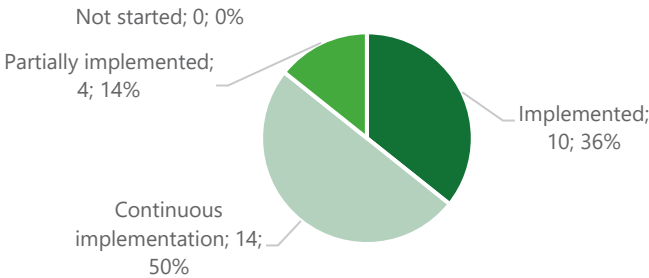
- #1: August 2023
- #2: December 2023
- #3: May 2024
- #4: September 2024
- #5: January 2025
- #6: June 2025
- #7: September 2025
- #8: December 2025
- #9 : March 2026 → **closing of all the actions**

SOCAPALM DIBOMBARI – ACTION PLAN – MARCH 2026									
ALLEGATIONS	TYPE	STATUS	ACTION	STATUS	STATUS & IMPLEMENTATION		LOCAL TIME SCHEDULE	INITIAL	REVISIONS
					MEASURED	IMPLEMENTED			
Lack of best practice management and communication	Found	Found	Creation of a communication plan for the company and the project	Completed	Implemented	Implemented	May 2024	Completed	Implemented
			Creation of a communication plan for the company and the project	Completed	Implemented	Implemented	May 2024	Completed	Implemented

Alignment of measures



Status of implementation of measures



S O C A P A L M D I B O M B A R I – P R O F O R E S T V E R I F I C A T I O N – A P R I L 2 0 2 6

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 implemented:** 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**

SOCAPALM DIBOMBARI – PROFOREST VERIFICATION – APRIL 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Lack of land for livelihoods/ land retrocessions	Founded	Do a risk analysis of Socapalm Dibombari concession in the light of the threats posed by the current demographic context.	Continuous	1. A risk analysis of Socapalm Dibombari concession in the light of the threats posed by the current demographic context has been conducted on the 19/11/2025.	1. Evaluation of the outcome of the risk assessment translated into action plans. 2. Monitoring the implementation of the action plan.	Fully aligned	Continuous implementation	H2ACE was contracted to conduct a risk assessment of the concession in November 2025. The assessment was carried out through data collection in 7 communities, as well as consultations with Socapalm employees, local and municipal authorities, and representatives of decentralized government departments. Based on the questionnaire used during the assessment, H2ACE should be able to analyze the collected data and generate demographic statistics to further support the findings and stakeholder analysis.

SOCAPALM DIBOMBARI – PROFOREST VERIFICATION –

APRIL 2026

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Lack of land for livelihoods/ land retrocessions	Founded	Obtain clarification from the administration on article 6 paragraph h of the emphyteutic lease and integrate these clarifications into the replanting strategy.	Continuous	1. Meeting organized between Socapalm and Ministry of Finance about the evaluation of the progress of "Etat des lieux". 2. Clarification has been requested by Socapalm through letters sent in 2024 to the Government. 3. Response of the Government sent in December 2024 requesting the creation of a "Commitment Evaluation and Monitoring Committee". 4. Letter sent in Dec 2024 by Socapalm appointing 2 representatives for the Committee. 5. Participation to meetings to obtain clarification on article 6, paragraph h of the emphyteutic lease is in progress. 6. Organization of a work session with Earthworm Foundation, Socfin HQ and Socapalm Top Management regarding the development of an action plan on article 6h. 7. Implementation of the Action Plan.	1. Communication on the outcome of the clarification from the administration. 2. Implementation of the outcomes.	Fully aligned	Continuous implementation	

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Lack of land for livelihoods/ land retrocessions	Founded	Continue to socialize communities about the retrocession process, with a view to systematically collect and address the concerns raised and reach agreements for the drawing up of definitive maps.	Continuous	1. Socialization of communities about the retrocession process is ongoing as it is included in the agenda of each bipartite meetings organized on quarterly basis with every community. 2. A dedicated staff is appointed to the stakeholder engagement. They are responsible to systematically collect concerns raised by communities which are recorded in a monitoring file to ensure traceability for the drawing up of the definitive maps.	1. Continuous engagement with communities to ensure clear understanding of the retrocession actions.	Fully aligned	Continuous implementation	Minutes of bipartite meetings demonstrate that updates and discussions regarding the retrocession process are included on the meeting agenda. Socapalm has appointed a dedicated Community Relations Officer responsible for engaging with communities, facilitating dialogue, and collecting community concerns and feedback. It is recommended that the dedicated staff member responsible for liaising between management and communities on matters related to the retrocession process be easily accessible to the community members.

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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Lack of land for livelihoods/ land retrocessions	Founded	Evaluate the retrocessions already carried out and draw on the lessons learned from these retrocessions to improve the current process.	Continuous	1. Evaluation of the retrocessions has been done. 2. A work session with Earthworm Foundation, Socfin HQ and Socapalm Top Management regarding the retrocession has been organized in July 2025. 3. Report of meeting provided with steps of retrocession and lessons learned.	1. Continual improvement based on the lessons learned from previous retrocession with implementation of recommendations.	Fully aligned	Continuous implementation	

SOCAPALM DIBOMBARI – PROFOREST VERIFICATION –

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			STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
TOPIC	FINDING					ALIGNMENT	STATUS	
Lack of land for livelihoods/ land retrocessions	Founded	Set up a system to disseminate information on the retrocession process to the entire concerned community.	Done	1. A system to disseminate information on the retrocession process to the entire community has been set up. 2. Dissemination of information about the retrocession process is ongoing as it is included in the agenda of each bipartite meetings organized on quarterly basis with every community. 3. A dedicated staff is appointed to the stakeholder engagement. They are responsible to conduct meetings with communities.	1. Ongoing communication to the entire community through the planning of meetings established on yearly basis by each community.	Fully aligned	Implemented	Socapalm has chosen the bipartite meetings, held on a quarterly basis, as the primary platform for communicating and disseminating information regarding the retrocession process. Minutes of the bipartite meetings reviewed confirm that updates on the retrocession process are regularly included as a standing agenda item. Socapalm has appointed a dedicated Community Relations Officer responsible for engaging with communities, facilitating dialogue, and collecting community concerns and feedback. It is recommended to continue community sensitization activities to address the different levels of understanding among communities regarding the retrocession process.

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Gender-based violence/ sexual harassment	Founded	Intensify communication with workers and local residents on the existence of the Gender Committee, its members, its role and activities.	Continuous	1. Communication with all workers and local residents on the existence of the Gender Committee, its members, its roles and activities has been intensified through the update of the Gender Committee's calendar of activities and more regular awareness-raising and official communications of the hierarchy.	1. Continue to improve the communication strategy to ensure trust and understanding by workers and local residents to the Gender Committee. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 3. Continue to multiply means of communication via meetings (excluding quarterly meetings) or discussion sessions, awareness-raising during specific activities that bring women together, regular updating of communication materials on notice boards...	Fully aligned	Continuous implementation	

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Gender-based violence/ sexual harassment	Founded	Increase the number and accessibility of channels for transmitting information to the Gender Committee.	Continuous	1. The number and accessibility of channels has been increased for the transmission of the information on Gender Committee (notice boards, ethic hotline,...). 2. The list of Gender Committee members has been displayed on additional notice boards.	1. Continual improvement on the accessibility of the communication channels. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	
		Set up Gender Committee relays in all neighboring communities.	Done	1. Gender Committee relays have been designated in all communities.	1. Ongoing communication with the committee relays in communities to ensure participation in the Gender Committee. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Implemented	

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Gender-based violence/ sexual harassment	Founded	Strengthen the gender technical capacities of Gender Committee members, particularly in the management of cases of violence.	Continuous	1. Creation of an instruction describing the steps, the key people responsible and the process in the event of a complaint relating to sexual harassment or rape. 2. Validation and official dissemination of the procedure throughout Socapalm. 3. Note from the GM* describing the purpose of this instruction and the related obligations. 4. Training of the Gender Committee on the content of the instruction and the established handling process.	1. Annual awareness-raising session to review the various aspects of investigating and handling harassment complaints. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 3. Monitoring of the implementation of the instruction via the multi sites meeting minutes.	Fully aligned	Continuous implementation	

* GM: General Manager

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Gender-based violence/ sexual harassment	Founded	Draw up and implement a procedure for handling complaints related to rape or sexual harassment that will ensure a high level of discretion.	Done	1. Creation of a procedure for handling complaints related to rape or sexual harassment that ensure a high level of discretion. 2. Implementation and communication of the procedure.	1. Planification of inspection and interviews to assess the implementation of the procedure. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Implemented	
		Draw up and implement a procedure for the apprehension of potential suspects by security staff.	Done	1. Creation of a procedure for the apprehension of potential suspects by security staff. 2. Implementation and communication of the procedure.	1. Planification of inspection and interviews to assess the implementation of the procedure. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Implemented	

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Gender-based violence/sexual harassment	Founded	Establish a mechanism for identifying and monitoring CVV* agents.	Continuous	1. Establishment of a mechanism for identifying and monitoring CVV through census, checklist and inspection.	1. Spot controls are conducted on CVV's workers to assess compliance. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	

* CVV: Comité Villageois de Vigilance - Village Vigilance Committee

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Gender-based violence/sexual harassment	Founded	Ensure that all external security agents are fully aware of Socapalm’s human rights commitments.	Continuous	1. Security agents have been trained on Socapalm's human rights commitments. 2. Socapalm has included awareness on human rights commitments in its annual training planning.	1. Spot controls are conducted on contractor's workers to assess their knowledge on Socapalm's human rights commitments. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	Evidence reviewed demonstrates that CVV and Africa Security personnel have received training on Socapalm’s Sexual Harassment Policy and Code of Ethics. The annual training plan includes modules covering Socapalm’s human rights commitments and related expectations for security personnel. Despite the training provided, interviews with security guards indicated a limited awareness and understanding of Socapalm’s specific human rights commitments.

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Occupation of sacred sites by plantations	Founded	Provide communities with validated sacred site management plans.	Done	1. Validated sacred sites management plans have been provided to communities and placed on community notice boards.	1. Ensure ongoing communication on sacred sites management plans. 2. Monitor the implementation of the management plan with the communities.	Fully aligned	Implemented	

* HCV: High Conservation Value

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Occupation of sacred sites by plantations	Founded	Sharing with communities reports on investigations into disputes over sacred sites.	Done	1. Reports on investigations into disputes over sacred sites have been shared with communities during annual "Bilan" bipartite meetings.	1. Ensure ongoing communication on sacred sites management plans.	Fully aligned	Implemented	Records of bipartite meetings indicate that updates and discussions regarding disputes related to sacred sites are regularly included in stakeholder engagement processes. However, communities expressed the need for further clarification regarding the status of sacred sites located within the concession and their accessibility.

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Water pollution	Partially founded	Treat condensate effluents before their discharge into the environment.	Done	1. An investigation has been conducted on the effluents treatment to identify the water flow of the effluent discharge. 2. Analysis are conducted on the effluent release point before discharge which are inside the parameters.	1. Ongoing surveillance and monitoring of the effluent discharge points to ensure no pollution to the environment.	Fully aligned	Implemented	

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Difficult access to drinking water	Founded	Carry out an analysis of the basic infrastructure needs of Dibombari's neighboring communities.	Done	1. Socapalm has engaged an external laboratory to carried out an analysis of the basic infrastructure needs of Dibombari's neighboring communities. 2. Based on this inventory, CSR* projects have been co-develop prioritizing the highest needs in a collaborative and participative way with communities.	1. Continual update of the census of infrastructure with ongoing implementation of the co-development programs with communities.	Fully aligned	Implemented	

* CSR: Corporate Social Responsibility

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Difficult access to drinking water	Founded	Draw up and implement a long-term basic infrastructure program, and periodically assess the level of implementation of this program.	Continuous	1. A long-term basic infrastructure program based on water supply has been drawn-up. 2. Implementation of the program is ongoing through the construction and rehabilitation of CSR projects. 3. The implementation of the program is periodically assessed to ensure ongoing improvement.	1. Mapping of water supply infrastructures and analysis of their functional status. 2. Focus on construction and rehabilitation of water infrastructures as part of social projects. 3. Bipartite meeting to discuss water resource management and development.	Fully aligned	Continuous implementation	

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Limited access to Socapalm health centers	Not founded	Communicate to all local communities about the opportunities offered by the Socapalm medical center (invite the medical team to certain meetings with the communities, etc.).	Continuous	1. Creation of a summary table of medical services provided to communities. 2. Setting up monthly monitoring of consultations. 3. Sharing of information during bipartite meetings.	1. Ensure continuous communication about the healthcare consultations accessed by the communities and the availability of the medical facilities.	Fully aligned	Continuous implementation	

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Complaints & requests management	Additional recommendation proposed by EF	Clarify how complaints made during bi-partite meetings are managed and include all site-related complaints in the follow-up register.	Done	1. Clarification on how complaints made during bi-partite meetings are managed has been included in the bipartite meeting agenda. 2. All site-related complaints have been included in the follow-up register "Tableau de suivi des communautés".	1. Ongoing communication to the entire community through the planning of meetings established on yearly basis by each community.	Fully aligned	Implemented	
		Systematically communicate to communities the decisions taken by Socapalm after analyzing their requests.	Continuous	1. Status of requests with decisions taken by Socapalm are systematically communicated to communities as it is included in the bipartite meeting agenda.	1. Ongoing communication to the entire community through the planning of meetings established on yearly basis by each community.	Fully aligned	Continuous implementation	

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Workers' housing	Additional recommendation proposed by EF	Continue the housing building project and take necessary action for unfit houses (marking, destruction).	Continuous	1. Socapalm has put in place a housing plan since 2017 with rehabilitation and new construction program and budget allocation. 2. Socapalm will continue the housing building project and take necessary action for unfit houses (prioritization, destruction).	1. Continual implementation and respect of the housing plan.	Fully aligned	Continuous implementation	

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Local entrepreneurship	Additional recommendation proposed by EF	Communicate transparently about outsourcing opportunities.	Done	1. Socapalm communicates transparently about outsourcing opportunities during its bipartite meetings with the communities. 2. Socapalm has increased its communication on job opportunities by giving priority to communities.	1. Continue to respect the meeting calendar to ensure open and ongoing communication.	Fully aligned	Implemented	
		Initiate a process to support local residents in entrepreneurship through sub-contracting, while respecting legal requirements.	Continuous	1. The process to support and advise local residents in entrepreneurship is ongoing through the guidance on legal requirements for sub-contractors, smallholders or partnership with communities.	1. Continue to promote the support to local residents through awareness programs, meetings and focus groups. 2. Monitor the implementation of all the alternatives activities implemented with the communities.	Fully aligned	Continuous implementation	

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Local entrepreneurship	Additional recommendation proposed by EF	Ensure legal compliance of CVV and set up a compliance monitoring mechanism (PPE* provision, employment contracts, CNPS**...).	Continuous	1. Establishment of a compliance monitoring mechanism for identifying and controlling CVV through census, checklist and inspection to ensure legal compliance.	1. Spot controls are conducted on CVV's workers to assess compliance.	Fully aligned	Partially Implemented	A compliance monitoring mechanism has been established and is currently being implemented to assess adherence to legal and internal requirements. However, with regard to labor code, the status of CVV agents presents several potential areas of non-compliance. Socapalm should take the necessary measures to ensure that the engagement and management of CVV agents are fully aligned with applicable labor law requirements.

* PPE: Personal Protective Equipment

** CNPS: Caisse Nationale de Prévoyance Sociale (Cameroun) - National Social Security Fund (Cameroon)

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