

Socfin-KCD & Coviphama - Action Plan

UPDATE APRIL 2026



SOCFIN - KCD & COVIPHAMA – ACTION PLAN – APRIL 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			TIMEFRAME		
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	<ol style="list-style-type: none"> 1. Communication is done through ongoing training on FPIC*. 2. External communication about Bunong people as indigenous people is done through Group's Sustainability report and Group's website. 	<ol style="list-style-type: none"> 1. Trainings to Managers and responsible deputies to be included in annual plans. 2. FPIC process respected during entire activities' development. 	Continuous	/	/
		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	<ol style="list-style-type: none"> 1. Implementation of specific measures in line with their status is done continuously through participation in traditional ceremonies and similar activities. 2. Annual Facebook post about on Indigenous People's day. 	<ol style="list-style-type: none"> 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. 	Continuous	/

* FPIC: Free, Prior, and Informed Consent

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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.)	Continuous	1. The Company is pursuing its work and communication with authorities to ensure compliance with the requirements of the Ministry of Environment related to the full EIA.	/	Continuous	/	/

* ESIA: Environmental and Social Impact Assessment

* EIA: Environmental Impact Assessment

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Flawed compensation program (Socfin-KCD)	Founded	Continue the implementation of the mediation on related farmland.	Started	<ol style="list-style-type: none"> 1. Implementation of the mediation on related farmland is ongoing since 2022 with ending date of 2026. 2. Clear process put in place with supporting evidences for each community. 3. 2026 community projects have been validated and will be implemented in a timely manner. 	<ol style="list-style-type: none"> 1. Monitor the implementation of the action plan and take appropriate action when needed. 2. Once completed, mediation implementation to be assessed. 	Dec. 2026	/	/

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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.	Done	1. Development and implementation of the stakeholder engagement strategy. 2. Discussion of stakeholder engagement strategy during tripartite committee meetings.	1. Periodical review of stakeholder engagement plan on a yearly basis	Jun. 2025	Dec. 2025	Time for discussion and disclosure with stakeholders underestimated
		Continue the implementation of the outcomes of the mediation process and ensure any grievances related to compensation and land claims are addressed.	Continuous	1. Implementation of the outcomes of the mediation process addressing grievances related to compensation and land claims.	1. Assessment of mediation implementation to verify efficiency of the process. 2. Continual implementation and communication on Grievance Procedure to ensure any grievances are addressed.	Continuous	/	/

* MoU: Memorandum of Understanding

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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	<ol style="list-style-type: none"> Suitable organization to conduct this study identified. ToR* of the study on the impact of Socfin-KCD and Coviphama operation on local community livelihoods have been established. 	<ol style="list-style-type: none"> Monitoring of the implementation of the recommendations. 	Dec. 2026	/	/

* ToR: Terms of Reference

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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	<ol style="list-style-type: none"> Contracts for contractors are meeting legal requirements. Contractor monitoring is conducted by the department engaging the contractors. Additional monitoring systems have been established (compliance, HSE*, ...). 	<ol style="list-style-type: none"> Ongoing control of the implementation of the monitoring system. 	Jun. 2025	/	/
		Ensure that all contractors' workers are registered to NSSF*.	Continuous	<ol style="list-style-type: none"> Implementation of measures to ensure that all contractors' workers are registered to NSSF. 	<ol style="list-style-type: none"> Monitoring of the contractor's workers to control their registration to NSSF. 	Jun. 2025	Continuous	/
		Ensure that all security agents go through medical check-ups before starting to work.	Done	<ol style="list-style-type: none"> Development of a register comprising the list of security agents with the medical check-ups dates and confirmation before starting to work. 	<ol style="list-style-type: none"> Organization of spott checks to verify that security agents are going to medical check-ups. 	Jun. 2025	/	/

* HSE: Health, Safety and Environment.

* NSSF: National Social Security Fund

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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	<ol style="list-style-type: none"> Meeting with workers' representatives occurred on February 2025 to find a solution to reflect night wage pay in wage pay slip. Payment of night work has been regularized for workers concerned and is reflected in their wage slip. 	<ol style="list-style-type: none"> Continuous engagement with workers' representatives. 	Mar. 2025	/	/
		Ensure that overtime of subcontractor workers is paid at the correct rate.	Done	<ol style="list-style-type: none"> Creation of an Excel monitoring file with details of payment by subcontractor workers showing calculation of overtime at the correct rates. Payment of overtime to subcontractor workers. 	<ol style="list-style-type: none"> Internal audits to verify the rate paid on overtime. 	Mar. 2025	/	/

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Poor working conditions related to transport conditions, working hours, health and safety	Partially founded	Ensure the transport conditions of employees are appropriate (protection against sun or rain, appropriate seats).	Done	1. Improvement of transport condition of employees (protection against sun and rain, and seats).	1. Continuous implementation of the measures put in place.	Jun. 2025	/	/
		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	1. A clear policy regarding the use of motorbikes owned by workers to carry the company's production, considering the HSE aspects: memo displayed, awareness raised and inspections conducted.	1. Monitoring system to control the compliance to the Company Memo.	Jun. 2025	/	/

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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	<ol style="list-style-type: none"> 1. Risk assessment for all companies' operations has been reviewed. 2. Workers received appropriate PPE and regular spott checks are conducted by the HSE staff. 	<ol style="list-style-type: none"> 1. Regular review of the departmental risk assessment to ensure all risks have been addressed. 	Mar. 2025	/	/

* PPE: Personal Protective Equipment

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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	1. A Khmer version of the Code of Conduct has been publicized with external stakeholders: distributed and communicated.	1. Ongoing communication of relevant policies and procedures with stakeholders.	Jun. 2025	/	/

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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.	Continuous	<ol style="list-style-type: none"> Continuous engagement with communities to clarify deadlines and terms and conditions related to implementing the mediation agreements. Mediation agreements are being implemented since 2018. Development of follow-up register on action plans of mediation agreements to ensure respect of timelines and budget per community. 	<ol style="list-style-type: none"> Continue close communication and meetings with communities. Put in place a monitoring table for MoU/ agreements. 	Dec. 2025	Continuous	/
		Ensure that all complaints raised during the implementation of the mediation outcomes are recorded and addressed properly.		Done	<ol style="list-style-type: none"> All complaints raised during the implementation of the mediation outcomes are recorded and addressed properly. 	<ol style="list-style-type: none"> Continue to record and address grievances as per Socfin-KCD/Coviphama SOPs*. Conduct a periodical review of the grievance register and put in place appropriate actions if necessary. 	Mar. 2025	/

* SOP: Standard Operating Procedure
04/2026

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Lack of transparency in the mediation process	Founded; not Socfin's responsibility	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.	Done	<ol style="list-style-type: none"> Organization of several meetings about the removal of the NDA. After discussions, all parties have jointly decided to remove the NDA. On 23/04/2026, a joint statement has been signed by the parties to remove the confidentiality provisions. 	<ol style="list-style-type: none"> Enhancing transparency and shared understanding of the outcomes of the mediation process. 	Dec. 2025	Apr. 2026	/
		Conduct a periodical review of the implementation of the mediation outcomes and put in place if necessary appropriate actions.	Continuous	<ol style="list-style-type: none"> Development of a periodical review and follow-up of the implementation of the mediation outcomes. Regular transparent communication about the mediation implementation with relevant stakeholders. 	<ol style="list-style-type: none"> Continuous revision of the implementation of the mediation outcomes. 	Continuous	/	/

* NDA: Non-Disclosure Agreement

* PHF: Plantation d'Hévéa Familiale

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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.	Continuous	<ol style="list-style-type: none"> Continuous support to communities in the process of formalization of communal land: <ul style="list-style-type: none"> Joint demarcation of communal lands inside the concessions with the communities completed during the mediation on communal lands; Ongoing discussions with the Government to facilitate the communities' process of registering the land as communal land 	<ol style="list-style-type: none"> Continue close communication and meetings with communities. 	Dec. 2025 (depending on RGC*)	Continuous	/

* RGC: Royal Government of Cambodia

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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.	Continuous	1. Community interests for the protection of gravesites is ensured through ongoing communication with communities and addressing requests.	/	Continuous	/	/
		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. 2. Development of a follow-up file to track any action based on timeline and status. 3. Ongoing respect to the implementation action plan.	1. Continue close communication and meeting with communities.	Continuous	/	/

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