

Evaluation of implementation of “Deep dive” action plan by Socfin Cambodia

Closing meeting – 19 June 2026



PROFOREST – ASSESSMENT TEAM



Aristotle Boaitey

Team Leader

Over 15 years' experience providing technical support and capacity building to companies, governments, civil society and stakeholders to develop and implement sustainability and international best practices for responsible production and sourcing of agricultural and forest commodities. This includes leading and supporting assessments and other client projects in several English-speaking and French-speaking countries across West, Central, East and Southern Africa, on environmental and social topics and spanning forest risk commodities such as rubber, palm, sugar, soy, timber, cocoa, cashew, shea and red seaweed.



Ryan Chua

Team Member

Over 10 years' experience supporting companies, governments, donors, and civil society organizations across Southeast Asia; leading work on human rights due diligence, responsible sourcing, sustainable supply chains, indigenous peoples' and local communities rights, DEI and public policy, with strong expertise in stakeholder engagement, human rights risk assessment, sustainable livelihoods, and inclusive forest governance.



Kaeng Keo

Interpreter

Over 39 years' experience supporting government institutions and international development organizations; leading training, complex research, surveys, evaluations, and needs assessments across community forestry, biodiversity conservation, climate change and resilience, natural resource management, renewable energy, E&S safeguarding, EUDR, livelihoods, food security, and organizational capacity development, with strong expertise in multi-stakeholder engagement and capacity building.



OVERVIEW & ASSESSMENT PROCESS

OVERVIEW

Objective

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

Scope

- Socfin-KCD and Coviphama's operations.
- EF's investigation of allegations against Socfin-KCD and Coviphama.
- Actions and measures in Socfin-KCD and Coviphama action plan (updated April 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 14 th June 2026	Proforest team arrives in Phnom Penh, Cambodia
Mon 15 th June 2026	Assessment team travels by road to Socfin-KCD and Coviphama
Tue 16 th to Thur 18 th June 2026	- Opening meeting (afternoon) - Document review - Interviews with management and key staff (EHS, HR, Community Relations, etc.), workers, workers representatives, etc. - Consultations with selected communities - Site visits
Fri 19 th June 2026	- Mop up and preparation for closing meeting (morning) - Closing meeting (afternoon)
Sat 20 th June 2026	- Proforest team travels to Phnom Penh - Interview with NGO
Sun 21 st June 2026	Proforest team departs from Phnom Penh



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CONTEXT

- From 2023 to the end of 2025, Socfin mandated Earthworm Foundation (EF) to conduct investigations to verify allegations raised by NGOs, including field missions.
- Following each mission, a report was published on EF website.
- Based on these reports, action plans were developed to address each finding.
- These action plans have been updated and published on a quarterly basis and are available on Socfin website.
- In January 2026, Socfin signed a partnership with Proforest to verify the alignment and implementation of the actions listed in these action plans through field visits.

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SOCFIN CAMBODIA – KEY ELEMENTS

Earthworm Foundation

January 2024: mission
December 2024: publication of the report

Jan. 2025 – Not yet finalized

Socfin publications of action plans

June 2026

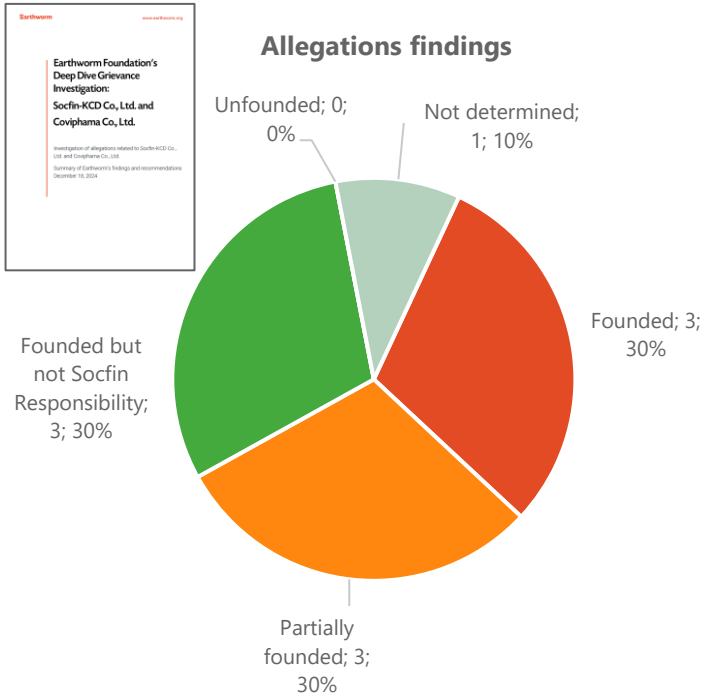
Proforest mission

10 allegations

23 actions

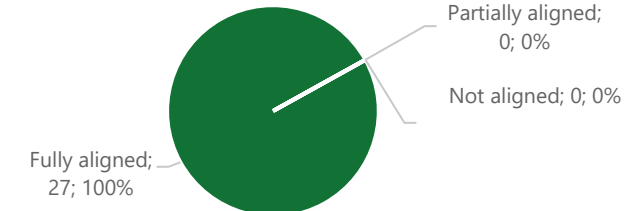
27 measures verified

Allegations findings

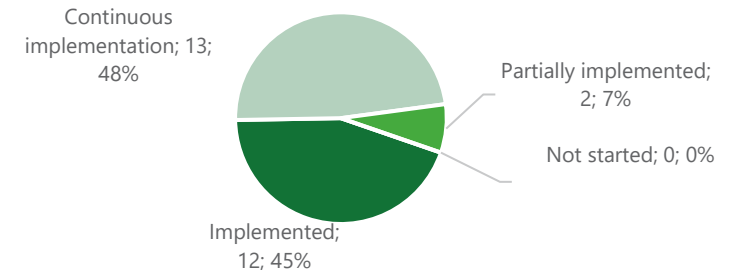


- #1: January 2025
- #2: April 2025
- #3: October 2025
- #4: January 2026
- #5: April 2026
- Closing of all the actions: June 2026

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 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**

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		COMMENTS & RECOMMENDATIONS
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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	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.	1. Trainings to Managers and responsible deputies to be included in annual plans. 2. FPIC process respected during entire activities' development.	Fully aligned	Continuous implementation	An internal training was conducted for some Managers and Deputies. However, for subsequent trainings on FPIC, there is the need to expand scope - to adequately address FPIC principles and process; as well as to cover all relevant staff.
		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	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 the Bunong on Indigenous People's day.	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.	Fully aligned	Continuous implementation	Socfin has included clauses in Stakeholder Engagement Plan, but it is recommended to make further adjustments.

* 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.	/	Fully aligned	Continuous implementation	Socfin should ensure that the assessment covers the full scope of Environmental & Social impacts.

* 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.	Continuous	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.	1. Monitor the implementation of the action plan and take appropriate action when needed. 2. Once completed, mediation implementation to be assessed.	Fully aligned	Continuous implementation	

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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.	Fully Aligned	Continuous implementation	Clauses on FPIC have been added to the Stakeholder Engagement Plan, however a revision of the plan is advised. Socfin has also adapted their approach for implementing community projects by engaging the community representatives as well as potentially affected persons.
		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	Fully Aligned	Implemented	It is recommended to consistently refer to the document as SOP.

* MoU: Memorandum of Understanding

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Forced evictions due to failure to respect communities' rights to FPIC (Socfin-KCD)	Partially founded	Continue the implementation of the outcomes of the mediation process and ensure any grievances related to compensation and land claims are addressed.	Continuous	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.	Fully Aligned	Continuous implementation	Socfin's grievance procedure was available for review, but the audit found inconsistent awareness by communities engaged, hence communication of procedure should be reinforced.

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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.	Continuous	1. Suitable organization to conduct this study identified. 2. ToR* of the study on the impact of Socfin-KCD and Coviphama operation on local community livelihoods have been established.	1. Monitoring of the implementation of the recommendations.	Fully Aligned	Continuous implementation	

* 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.	Continuous	1. Contracts for contractors are meeting legal requirements.	1. Ongoing control of the implementation of the monitoring system.	Fully Aligned	Partially Implemented	Sampled contracts include some relevant legal requirements, but this was not consistent for all sampled contracts. There is the need for consistent implementation for all contracts.
				2. Contractor monitoring is conducted by the department engaging the contractors.		Fully Aligned	Partially Implemented	A comprehensive system should be implemented to ensure uniform monitoring of all contracts.
				3. Additional monitoring systems have been established (compliance, HSE*, ...).		Fully Aligned	Continuous implementation	HSE and compliance monitoring was found to be conducted by Sustainability team, relevant Leads & Supervisors. However, there is the need to improve record keeping, e.g., for security.

* HSE: Health, Safety and Environment.

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Poor working conditions related to transport conditions, working hours, health and safety	Partially founded	Ensure that all contractors' workers are registered to NSSF*.	Done	1. Implementation of measures to ensure that all contractors' workers are registered to NSSF.	1. Monitoring of the contractor's workers to control their registration to NSSF.	Fully Aligned	Implemented	
		Ensure that all security agents go through medical check-ups before starting to work.	Done	1. Development of a register comprising the list of security agents with the medical check-ups dates and confirmation before starting to work.	1. Organization of spot checks to verify that security agents are going to medical check-ups.	Fully Aligned	Implemented	It is recommended to refine the long-term strategy to better align with the intended outcomes.

* 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	1. Meeting with workers' representatives occurred in February 2025 to find a solution to reflect night wage pay in wage pay slip.	1. Continuous engagement with workers' representatives.	Fully Aligned	Implemented	
				2. Payment of night work has been regularized for workers concerned and is reflected in their wage slip.		Fully Aligned	Implemented	Socfin should conduct a comprehensive audit of the attendance and payroll system, address any errors and where there has been underpayment, reimburse affected staff.
		Ensure that overtime of subcontractor workers is paid at the correct rate.	Done	1. Creation of an Excel monitoring file with details of payment by subcontractor workers showing calculation of overtime at the correct rates. 2. Payment of overtime to subcontractor workers.	1. Internal audits to verify the rate paid on overtime.	Fully Aligned	Implemented	

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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.	Fully Aligned	Implemented	It is suggested to include coverings on the sides of the vehicles as well as cushions on seats.
		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.	Fully Aligned	Implemented	There is the need to strengthen compliance and monitoring of policy on use of motorbikes owned by workers for the Company's operation.

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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.	Continuous	1. Risk assessment for all companies' operations has been reviewed. 2. Workers received appropriate PPE and regular spot checks are conducted by the HSE staff.	1. Regular review of the departmental risk assessment to ensure all risks have been addressed.	Fully Aligned	Continuous implementation	

* 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.	Fully Aligned	Implemented	

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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.	Done	1. Continuous engagement with communities to clarify deadlines and terms and conditions related to implementing the mediation agreements. 2. Mediation agreements are being implemented since 2018. 3. Development of follow-up register on action plans of mediation agreements to ensure respect of timelines and budget per community.	1. Continue close communication and meetings with communities. 2. Put in place a monitoring table for MoU/ agreements.	Fully Aligned	Implemented	
		Ensure that all complaints raised during the implementation of the mediation outcomes are recorded and addressed properly.	Done	1. All complaints raised during the implementation of the mediation outcomes are recorded and addressed properly.	1. Continue to record and address grievances as per Socfin-KCD/Coviphama SOPs*. 2. Conduct a periodical review of the grievance register and put in place appropriate actions if necessary.	Fully Aligned	Implemented	

* SOP: Standard Operating Procedure

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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	1. Organization of several meetings about the removal of the NDA. 2. After discussions, all parties have jointly decided to remove the NDA. 3. On 23/04/2026, a joint statement has been signed by the parties to remove the confidentiality provisions.	1. Enhancing transparency and shared understanding of the outcomes of the mediation process.	Fully Aligned	Implemented	
		Conduct a periodical review of the implementation of the mediation outcomes and put in place if necessary appropriate actions.	Continuous	1. Development of a periodical review and follow-up of the implementation of the mediation outcomes. 2. Regular transparent communication about the mediation implementation with relevant stakeholders.	1. Continuous revision of the implementation of the mediation outcomes.	Fully Aligned	Continuous implementation	

* NDA: Non-Disclosure Agreement

* PHF: Plantation d'Hévéa Familiale / Family-Owned Rubber Tree Plantation

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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	1. Continuous support to communities in the process of formalization of communal land: - 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.	1. Continue close communication and meetings with communities.	Fully Aligned	Continuous implementation	

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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.	/	Fully Aligned	Continuous implementation	
		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.	Fully Aligned	Continuous implementation	

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