

Evaluation of implementation of “Deep dive” action plan by Société des Caoutchoucs de Grand- Béréby (SOGB)

Closing meeting – 15 May 2026

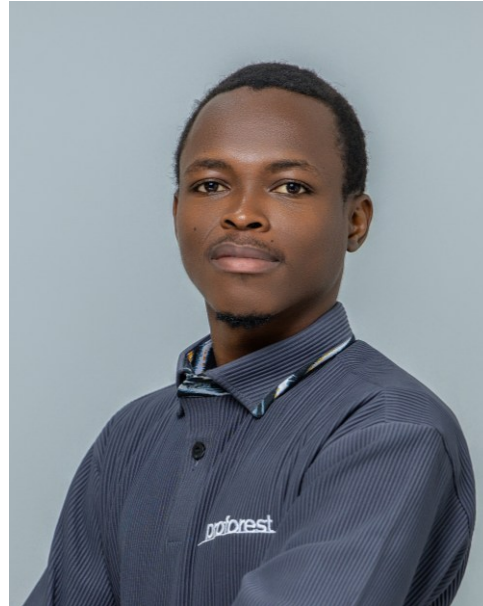


PROFOREST – ASSESSMENT TEAM



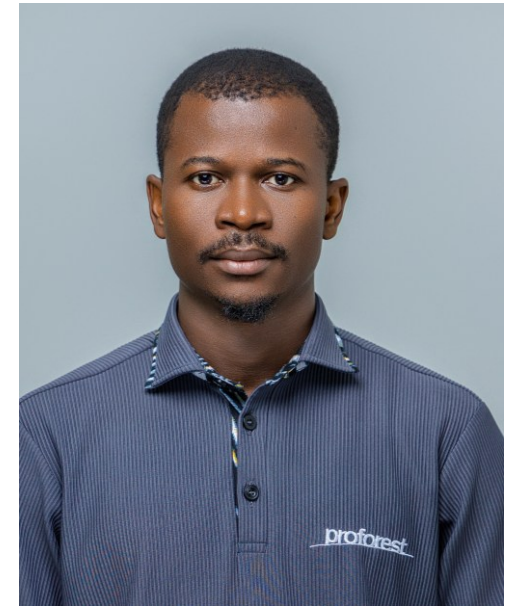
Patricia Offei

Team Leader



Tchérégnimin Soro

Team Member



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Team Member



OVERVIEW & ASSESSMENT PROCESS

OVERVIEW

Objective

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

Scope

- SOGB's operations.
- EF's investigation of allegations against SOGB.
- Actions and measures in SOGB action plan (updated Mai 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
Mon 11 May 2026	• Proforest team arrived at SOGB. • Opening meeting.
Tue 12 May 2026	• Document review. • Interviews with management and key staff (HSE*, HR**, Community Relations Manager, Plantation Manager, Gender Committee, etc.), workers.
Wed-Thu 13-14 May 2026	• Consultations with the selected communities (Kako, Oueoulo, Heke, Klotou, Teklebo) and the AVD***. • Site visits (drain and the palm oil mill and rubber lagoons). • Meeting with an NGO**** and a local authority (virtual or in person).
Fri 15 May 2026	• Follow-up and preparation for the closing meeting (morning). • Closing meeting (afternoon).
Sat 16 May 2026	• Proforest team departs.

* HSE: Health, Safety and Environment

** HR: Human Resources

*** ADV: Association des Villages Déplacés (Association of Displaced Villages)

**** NGO: Non-Governmental 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

SOGB – PROFOREST VERIFICATION – MAY 2026

SOGB – KEY ELEMENTS

Earthworm Foundation

September 2024: mission
March 2025: publication of the report

Mar. 2025 – Not closed

Socfin publications of action plans

May 2026

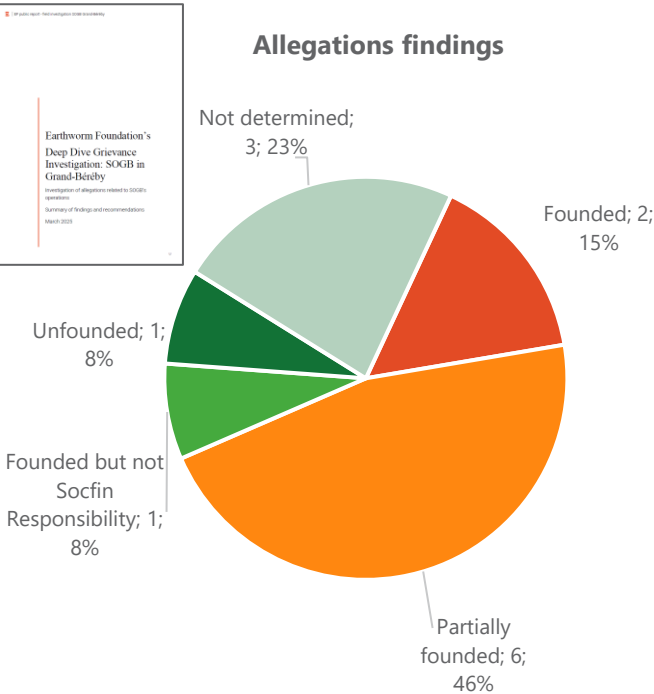
Proforest mission

13 allegations

32 actions

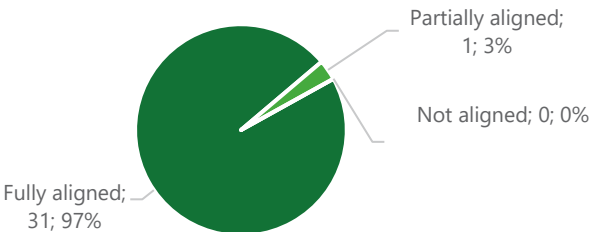
32 measures verified

Allegations findings

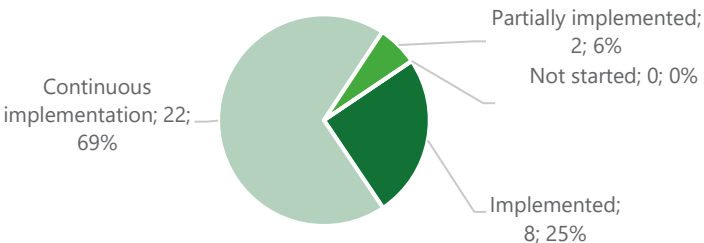


- #1: March 2025
- #2: June 2025
- #3: September 2025
- #4: January 2026
- #5: May 2026
- #6: May 2026 with this verification
- All the actions are not closed for the moment

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**

SOGB – PROFOREST VERIFICATION – MAY 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Non-compliance with FPIC* in land transfers and/or land use agreements	Founded but not the responsibility of the SOGB	Continue engagement with local communities through a collaborative and participatory approach.	Continuous	1. SOGB maintains a long-term and ongoing commitment to the 13 riparian communities through a collaborative and participatory approach.	1. Implementation of the updated stakeholder engagement strategy describing the engagement methodology, frequency of meetings, awareness-raising, and ongoing monitoring of their social projects.	Fully aligned	Continuous implementation	Communities confirmed that SOGB maintains continuous engagement with them. However, this engagement should be formalized by defining a minimum meeting frequency, as one meeting per year is insufficient to ensure effective follow-up of environmental and social issues.

* FPIC: Free, Prior and Informed Consent

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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Encroachments by SOGB in the villages of Oueoulo, Heke, Klotou and Teklebo	Founded	Continue negotiations on the unresolved case of Kako and address complaints arising from the process.	Continuous	1. The SOGB finalized negotiations on the Kako case through meetings with village representatives. 2. Potential complaints arising from this process will be systematically recorded and addressed. 3. Compensation project materials have been commissioned and made available to the village of Kako.	1. Continue transparent and regular communication with the village of Kako.	Fully aligned	Continuous implementation	
		Implement compensation projects approved with communities.	Continuous	1. Compensation projects that have been validated in a participatory manner with the communities are implemented.	1. Maintain transparent and regular communication with communities through a biannual consultation calendar established in advance with each community.	Fully aligned	Continuous implementation	

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Encroachments by SOGB in the villages of Queoulo, Heke, Klotou and Teklebo	Founded	Clarify the difference in area observed between the lease and land titles and the servitude of the old Road of Tabou and National Road A7.	Continuous	1. The SOGB analyzed the differences in surface area through: - official documents, - the creation of maps superposing the different surface areas and the road servitude. 2. The SOGB began discussions with the land register to update the LT* based on the differences with the lease.	1. Perform the administrative procedures necessary to update documents containing errors.	Fully aligned	Continuous implementation	It is recommended that SOGB continue discussions with the land registry authorities to finalize the clarification and resolve the discrepancies between the lease agreement, the land titles, and the servitude boundaries.

* LT: Land Title

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Encroachments by SOGB in the villages of Oueoulo, Heke, Klotou and Teklebo	Founded	Address outstanding issues in the concession boundary finalization process before completing the process.	Continuous	1. The final stages of the boundary finalization process consisted of having the reports validated by the administrative authorities and sharing them with the communities concerned. 2. A ceremony was organized when the documents were validated by the Deputy Prefect. 3. The documents are shared progressively, depending on the availability of the communities during environmental and social meetings and tours.	1. Maintain transparent and regular communication with communities through a biannual consultation calendar established in advance with each community.	Fully aligned	Continuous implementation	

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Encroachments by SOGB in the villages of Oueoulo, Heke, Klotou and Teklebo	Founded	Share copies of the various reports and minutes with the parties concerned.	Continuous	1. The minutes of encroachment proceedings following the resolution of the encroachment process have been distributed. 2. 100% of copies of the various reports and minutes have been sent to community leaders. 3. Proof of receipt of copies by members of the communities concerned are being submitted to SOGB on a gradual and ongoing basis by the latter.	1. Maintain transparent and regular communication with communities through a biannual consultation calendar established in advance with each community.	Fully aligned	Continuous implementation	

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Livelihood issues	Not determined	Carry out a study of the impact of SOGB on the livelihoods of riparian communities and implement the action plan resulting from this study.	Started	1. SOGB has inquired about conducting a study on the impact of SOGB on the livelihoods of riparian communities and implementing the action plan resulting from this study. 2. The ToR* have been developed and submitted by the agency concerned for the conduct of such a study. 3. The ToR are currently being validated by management.	1. Monitoring of measures identified in the impact assessment.	Fully aligned	Partially Implemented	It is recommended that SOGB validate the ToR and subsequently launch the study to ensure its completion by the end of the first quarter of 2027.

* ToR: Terms of reference

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Livelihood issues	Not determined	Communicate transparently on subcontracting opportunities.	Continuous	1. SOGB ensures transparent communication regarding subcontracting opportunities through its External Relations Department. 2. The HERD* organizes consultations with each community as part of its “Environmental and social tour” to discuss local concerns and identify potential solutions. 3. Subcontracting opportunities are among the topics discussed with the 13 communities during these engagement sessions.	1. Communicate continuously with communities about contractual opportunities through a biannual consultation calendar established in advance with each community.	Fully aligned	Continuous implementation	It is recommended that SOGB formalize this engagement mechanism, building on the consultations already conducted by the HERD through the “Environmental and social tour”, by defining the communication channels, meeting frequency, a semi-annual schedule, and reporting arrangements to ensure the regular, transparent, and traceable sharing of subcontracting opportunities with the 13 communities.

* HERD: Head of External Relations Department.

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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Livelihood issues	Not determined	Implement the surface water management plan as recommended by the HCV* studies.	Continuous	1. The water management plan recommended by the HVC studies has been developed and is monitored on an ongoing basis. 2. This plan includes actions related to surface water and groundwater. 3. The surface water management plan is implemented on an ongoing basis through water analysis and the application of laboratory recommendations. 4. Correspondence has been exchanged with the MINEF* in order to regularize the authorization for water retention (Lake Kako 3).	1. Ensure compliance with and ongoing monitoring of actions arising from the various SOGB management plans.	Fully aligned	Continuous implementation	The activities outlined in the surface water management plan are being implemented. Water quality analyses are conducted, the associated recommendations are implemented, and the results are communicated to the affected communities. It is recommended that SOGB follow up with MINEF to obtain official feedback on the water quality analysis results and the actions undertaken.

* HCV: High Conservation Value

** MINEF: Ministry of Water and Forests

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TOPIC	FINDING					ALIGNMENT	STATUS	
Pollution of rivers by factory effluents, fertilizers and other chemical products used by SOGB	Not determined	Involve communities as much as possible in the process of sampling and analysis of surface water in order to enhance the credibility and acceptance of the results of the analyses.	Done	1. Since 2024, communities have been involved in the water sampling and analysis process. 2. The analysis report issued by the government-approved laboratory has been improved to include community participation.	1. Inclusion of a chapter presenting the water analysis methodology during bipartite meetings with each community.	Fully aligned	Implemented	

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Pollution of rivers by factory effluents, fertilizers and other chemical products used by SOGB	Not determined	Communicate the results of surface water analyses to communities.	Continuous	1. Since 2025, the results of analyses have been shared with communities during working sessions with the AVD*. 2. The HERD has held consultations with each community entitled “Environmental and social tour” aimed at addressing several concerns and challenges raised by communities, in particular the results of water analyses.	1. Inclusion of a chapter presenting the results of water analysis during bipartite meetings with each community.	Fully aligned	Continuous implementation	Discussions with the communities AVD confirmed that they regularly receive the water quality analysis results. It is, however, recommended that these results be presented in a simpler and more accessible format to facilitate understanding by the communities.

* ADV: Association des Villages Déplacés (Association of Displaced Villages)

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Pollution of rivers by factory effluents, fertilizers and other chemical products used by SOGB	Not determined	Document all incidents affecting sampling points that may justify changes to them.	Done	1. Environmental incidents are systematically recorded in the monthly HSE* report. 2. Potential incidents affecting sampling points are documented. 3. A map of sampling points has been drawn up, including potential incident locations.	1. Follow-up on actions related to reported incidents.	Fully aligned	Implemented	

* HSE: Health, Safety and Environment

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Limited access to drinking water	Partially founded	Conduct a review of the water supply infrastructure built by SOGB in order to implement appropriate corrective measures where possible.	Done	1. An inventory of water supply infrastructure was carried out. 2. The HERD held consultations with each community entitled “Environmental and social tour” aimed at addressing several concerns and challenges raised by the communities, particularly access to drinking water.	1. Inclusion of a chapter presenting borehole water infrastructure during bipartite meetings with each community in order to prioritize projects related to access to drinking water.	Partially aligned	Continuous implementation	The inventory of water supply infrastructure has been carried out. The implemented measures should be updated to include the implementation of appropriate corrective actions.
		Define a standard for drinking water access infrastructure.	Done	1. A standard for drinking water access infrastructure has been defined and approved by General Management. 2. This standard is already in use at SOGB.	1. Ensure compliance with the standard in future projects.	Fully aligned	Implemented	SOGB should share the standard with the relevant stakeholders.

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Restrictions on freedom of movement	Partially founded	Formalize the training program for Security Officers and maintain evidence of their training.	Done	1. The training program for Security Officers including freedom of movement has been formalized. 2. Training sessions on freedom of movement have been organized for Security Officers. 3. SOGB has formalized the prohibition on movement through an official memo issued by the General Manager on July 19, 2025.	1. Ensure the implementation of annual training plans for Security Officers.	Fully aligned	Implemented	SOGB shall continue implementing the Socfin 2025 code of conduct / Freedom of movement – SOGB Concession training program (delivered on 24–25 June 2026 by the Health and Safety Officer), while ensuring the systematic archiving of training records and the organization of refresher sessions to cover all security personnel, using training materials adapted to their level of education.

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Restrictions on freedom of movement	Partially founded	Stop fundraising associated with permits to drive on the concession and ensure that this practice is legal.	Done	1. In the absence of clarification on Decree 2016-864 regulating the use of public roads, SOGB has ceased collecting funds associated with permits to drive in the concession through the publication of a memo issued by the General Manager on July 19, 2025.	1. Maintain compliance with legal, regulatory, or contractual provisions regarding authorization to drive.	Fully aligned	Implemented	It is recommended that SOGB remove the line referring to the amount indicated on the circulation permits to avoid any confusion. It is also recommended that SOGB ensure all security personnel receive the same level of information, including by displaying the service memo at all security posts.

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Imposition of delivery quotas and late payment to smallholders	Partially founded	Finalize the geolocation of rubber tree plots.	Continuous	1. The geolocation of rubber tree plots is carried out continuously in accordance with the requirements of the EUDR* compliance process.	1. Continuous monitoring and verification of geolocated plots. 2. Plan annual awareness programs on the EUDR requirement and the traceability procedure. 3. Monitor compliance with the traceability procedure.	Fully aligned	Continuous implementation	

* EUDR: European Union Deforestation Regulation

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Imposition of delivery quotas and late payment to smallholders	Partially founded	Update the delivery quota based on the size of the plots (updated at the request of the smallholder).	Done	1. The delivery quota has been updated based on the size of the plots. 2. SOGB updated its traceability procedure in 2025, which refers in particular to delivery quotas based on the size of the smallholders' plots.	1. Continue to comply with delivery quotas set according to plot size. 2. Plan annual awareness programs on the definition of quotas by area to avoid any misunderstanding. 3. Monitor compliance with the traceability procedure.	Fully aligned	Implemented	

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Occupation of lowlands by SOGB plantations	Founded	Implement the low-lying land and drainage system management plan in accordance with the SOGB's flooded areas procedure.	Continuous	1. The low-lying land drainage management plan is implemented on an ongoing basis in accordance with the recommendations of HCV study experts. 2. As part of this management plan, the “procedure for cleaning unprotected drains” was established in 2024 to facilitate the drainage of flooded areas in SOGB plots. 3. Maps of flood-prone plots have been developed.	1. Ensure compliance with the drain cleaning procedure and the related action plan.	Fully aligned	Continuous implementation	Finalize the desilting works, ensure they are carried out in line with the standards and conduct acceptance of the work once the contractor has finished. Document this with a work acceptance report for the desilting works.

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Non-compliance with the MoU* signed in September 2009	Partially founded	Train SOGB teams and community representatives on project identification methods.	Done	1. Training of SOGB teams on project identification methods has been completed. 2. The HERD held consultations with each community entitled “Environmental and social tour” to address several concerns and challenges raised by the communities, including the methodology used to select projects and the priority given to basic needs projects.	1. Continue raising awareness among riparian communities during the 2025 environmental tour.	Fully aligned	Implemented	Alignment: Taking into account the results of the infrastructure inventory when selecting service providers. It is recommended that SOGB ensure the systematic archiving of training reports, training materials, and attendance records, and provide refresher sessions for newly appointed representatives.

* MoU: Memorandum of Understanding

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Non-compliance with the MoU signed in September 2009	Partially founded	Improve the quality of infrastructure projects carried out for communities; emphasis should be placed on the selection and evaluation of service providers.	Continuous	1. Establishment of an inventory of completed infrastructure and assessment of its current condition. 2. The purpose of this inventory is to collect qualitative and quantitative data such as construction details, quality, year, responsible service provider, operating time, etc., in order to focus on the selection and evaluation of service providers. 3. Comparison of inventory results by provider. 4. Systematic evaluation of providers.	1. Taking into account the results of the infrastructure inventory when selecting service providers.	Fully aligned	Continuous implementation	The infrastructure inventory has been completed. It is recommended that: • SOGB document and retain the comparative assessment of the infrastructure inventory by service provider. • SOGB implement the established service provider evaluation criteria for future infrastructure projects.

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Non-compliance with the MoU signed in September 2009	Partially founded	Ensure rigorous implementation of the MoU with communities, taking into account the details of each project to be carried out (number of kilometers of road to be maintained, project completion deadline, etc.).	Continuous	1. The implementation of the MoU with the communities is rigorously monitored, in particular through: - Improvement of the project monitoring table by year and by community. - Translating the elements of the 2009 MoU and the 2021 and 2023 amendments into an annual monitoring file to enable clear communication and monitoring with the communities. - Organizing discussion sessions with each community on the rigorous implementation of this MoU to ensure a common understanding of project progress and requests.	1. Monitoring the rigorous implementation of the project to be carried out in accordance with the MoU with the communities, taking into account the details of each project to be carried out.	Fully aligned	Continuous implementation	

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Non-compliance with the MoU signed in September 2009	Partially founded	Conduct an assessment of the impact of the protocol's implementation after 15 years and implement appropriate actions.	Started	1. The ToR for evaluating the impact of the protocol's implementation after 15 years have been drafted. 2. The appropriate actions resulting from this will be implemented. 3. The actions arising from the findings of the evaluation will subsequently be implemented and monitored appropriately.	1. Implementation of recommendations resulting from the impact assessment.	Fully aligned	Partially Implemented	It is recommended that SOGB approve the ToR and initiate the study to ensure its completion by the end of the first quarter of 2027.
		Consider, in collaboration with the relevant stakeholders, a mediation process to find a solution to the conflict in Kako.	Continuous	1. Collaboration with Kako stakeholders began with the development of a compensation project established in a participatory manner and validated by this community. 2. Discussions regarding other projects are underway with the Kako community, with the support of the AVD and the Deputy Prefect of Béréby.	1. Prioritize mediation to find a solution to any conflicts.	Fully aligned	Continuous implementation	Continue discussions with the village of Kako to reach agreements on the different issues.

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

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Lack of jobs for young people in local communities	Partially founded	Update the database to collect statistics on the number of workers from local communities.	Continuous	1. The database is continuously updated based on censuses conducted with the assistance of the AVD of potential workers from riparian communities.	1. Continuous updating of statistics on the number of workers from local communities to guide decision-making.	Fully aligned	Continuous implementation	It is recommended that SOGB develop a dashboard to monitor trends and key performance indicators.
		Continue to raise awareness among communities to ensure a better understanding of the recruitment process.	Continuous	1. The HERD held consultations with each community entitled “Environmental and social tour” aimed at addressing several concerns and challenges raised by the communities, particularly the recruitment process.	1. Ensure the implementation of annual community awareness plans to promote a better understanding of the recruitment process.	Fully aligned	Continuous implementation	It is recommended that SOGB reduce the number of topics covered during each meeting and increase the frequency of meetings to 1 meeting/village or quarter.

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Lack of jobs for young people in local communities	Partially founded	Systematically ensure that job offers are disseminated/communicated within a reasonable time frame.	Done	1. The communication process with the recruitment agency has been improved through the dissemination of job offers to communities: - Advertisements are communicated directly to communities and recorded with acknowledgments of receipt. - The time required to transmit offers has been reduced through direct exchange between SOGB and each community.	1. Continue to ensure that job offers are advertised/communicated in a timely manner.	Fully aligned	Implemented	

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Lack of jobs for young people in local communities	Partially founded	Finalize the list of potential workers by community and make it available to the SOGB (AVD).	Continuous	1. The HERD held consultations with each community entitled “Environmental and social tour” aimed at addressing several concerns and challenges raised by the communities, including the list of potential workers. 2. The list of potential workers per community is shared on an ongoing basis with the SOGB.	1. Communicate continuously with communities about job opportunities and offers through a biannual consultation schedule established in advance with each community.	Fully aligned	Continuous implementation	

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Lack of jobs for young people in local communities	Partially founded	Implement programs that promote the development of talent within communities likely to join the SOGB (support for local institutions, internships for young people, scholarship programs for the best students, etc.).	Continuous	1. Programs that promote the development of talent within communities likely to join the SOGB are described and discussed during environmental and social tours with all communities. 2. The programs that are implemented include internships for young people and support for projects established in the area.	1. Ensure that the programs put in place are systematically integrated into community meetings with a clear list of the projects concerned.	Fully aligned	Continuous implementation	It is recommended that SOGB document the programs promoting talent development within the communities and communicate these opportunities to the communities.

SOGB – PROFOREST VERIFICATION – MAY 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Lack of skilled or managerial jobs for young people in local communities	Partially founded	Continue to improve the communication process with the executive recruitment firm (advertisement content, communication channels) in order to facilitate the transmission of information to local communities.	Continuous	1. The process of communicating with the recruitment agency is constantly improving through announcements to the communities: - Announcements are recorded with acknowledgments of receipt. - The time taken to send offers has been reduced through direct communication between SOGB and each community.	1. Communicate continuously with communities about job opportunities and offers through a biannual consultation schedule established in advance with each community.	Fully aligned	Continuous implementation	

SOGB – PROFOREST VERIFICATION – MAY 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Lack of skilled or managerial jobs for young people in local communities	Partially founded	Raise awareness among communities to ensure a better understanding of the executive recruitment process.	Continuous	1. The HERD held consultations with each community entitled “Environmental and social tour” aimed at addressing several concerns and challenges raised by the communities, particularly the recruitment process. 2. Establishment of an annual awareness plan incorporating the recruitment process.	1. Define annual community awareness plans to ensure a better understanding of the recruitment process. 2. Ensure compliance with awareness plans.	Fully aligned	Continuous implementation	It is recommended to reduce the number of topics covered per session and increase the frequency of meetings to 1 meeting/village or quarter.

SOGB – PROFOREST VERIFICATION – MAY 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
Sacred sites violated	Not determined	Finalize the process of mapping sacred sites and develop management plans in a participatory approach with the communities concerned.	Continuous	1. The participatory mapping process for sacred sites has been completed with each of the 13 communities involved. 2. Management plans resulting from the mapping process have been developed through a participatory approach with the communities involved.	1. Compliance with management plans established in a participatory manner. 2. Monitoring of management plans.	Fully aligned	Continuous implementation	The mapping process was conducted in a participatory manner with the involvement of the communities. It is recommended that the maps produced be shared with each community and that the drafting and finalization of the corresponding management plans be continued in consultation with the affected communities.

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