

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

Closing meeting – 15 April 2026



PROFOREST – ASSESSMENT TEAM



Patricia Offei

Team Leader

Over 15 years' experience in Human Rights Due Diligence (HRDD), Responsible Sourcing and Traceability, capacity building, coaching and technical assistance, certification support, Environmental and Social Due Diligence (ESDD) assessment, High Conservation Value and High Carbon Stock (HCV-HCS) assessment and training, RSPO Lead Auditor, Rainforest Alliance Lead Auditor and Report Reviewer.



Joseph Isaiah Mensah

Team Member

10 years' working in program and project design and management, Social Impact Assessments, ESDD, Baseline audits, social study in HCV-HCS Assessments.



Louis Defo

Team Member

20 years' experience working on conservation and natural resource management in the following areas: sustainable forest management, forest certification, land use planning, community-based natural resource management (forest and wildlife); protected area planning and management; transboundary cooperation for forest and wildlife management; facilitation of multi-stakeholders process; facilitation of Free Prior and Informed Consent (FPIC) process; Indigenous peoples rights and conservation; sustainable production of agricultural commodities, climate change, and Payment for Environmental Service (PES).



OVERVIEW & ASSESSMENT PROCESS

OVERVIEW

Objective

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

Scope

- Socapalm - Mbambou operations.
- EF's investigation of allegations against Socapalm - Mbambou .
- Actions and measures in Socapalm - Mbambou 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
Mon 13 Apr 2026	• Opening meeting (Monday morning) • Document review • Interviews with management and key staff (Plantation Manager, Community Relations, Gender Committee, Sustainability Team), CVV, Security Agents
Tues 14 Apr 2026	• Consultations with selected communities (Mbimbé, Dikola and Mbaña) • Observations of community infrastructure: ○ Borehole at Mbaña
Wed 15 Apr 2026	• Meeting with Prefet • Mop up and preparation for closing meeting (morning) • Closing meeting (afternoon)



S O C A P A L M M B A M B O U – 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

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.

SOCAPALM MBAMBOU – PROFOREST VERIFICATION – APRIL 2026

SOCAPALM MBAMBOU – KEY ELEMENTS

Earthworm Foundation

May 2024: mission
Feb. 2025: publication of the report

Feb. 2025 – Mar. 2026

Socfin publications of action plans

Apr. 2026

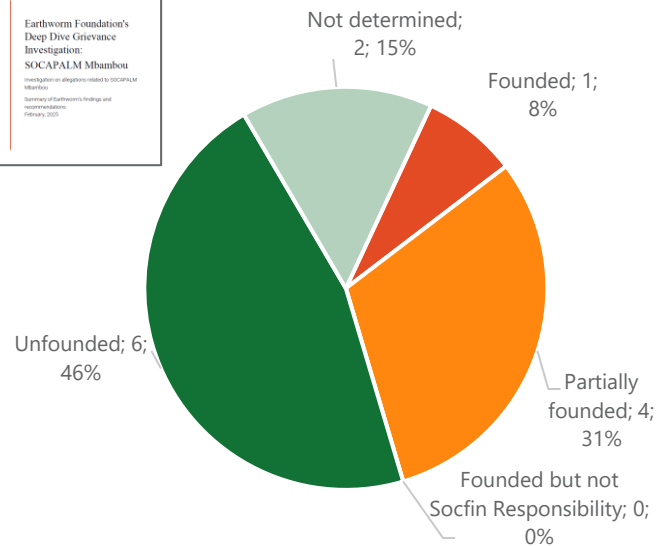
Proforest mission

13 allegations

20 actions

22 measures verified

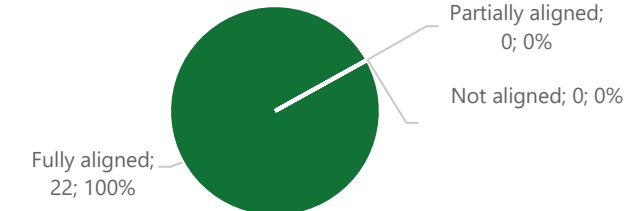
Allegations findings



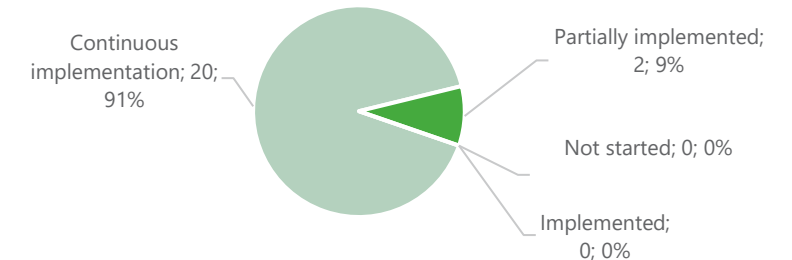
- #1: February 2025
- #2: June 2025
- #3: September 2025
- #4: December 2025
- #5 : March 2026 → **closing of all the actions**

SOCAPALM MBAMBOU – ACTION PLAN – MARCH 2026									
ALLEGATIONS		ACTIONS		STATUS & IMPLEMENTATION		TIMELINE			
TOPIC	FINDING	ACTIONS	STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY	
Non-implementation of the commitments and obligations in the concession agreement	Partially founded	1. Organize a meeting for the presentation of the concession agreement to the local communities and engage them in the process of regularizing the situation of the encroached area in consultation with the authorities concerned.	Continued	1. Sharing of the concession survey reports with the concerned communities.	1. Promote long-term transparency and accountability by systematically sharing land status information and engaging communities in discussions on land use and boundaries.	Dec. 2025	Continued	/	
		2. Meet with the MINICAP to progress on the regularization process of regularizing the encroached area in consultation with the authorities concerned.	Continued	2. Dissemination of progress and challenges in the regularization process. Organization of a week session with Earthworm Foundation, Socfin MC and Socapalm Top Management regarding the regularization and living space.	1. Regular monitoring and documentation of the regularization process with MINICAP and stakeholders to ensure transparency and timely updates.	Mar. 2026	Continued	/	

Alignment of measures



Status of implementation of measures



S O C A P A L M M B A M B O U – 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 MBAMBOU – PROFOREST VERIFICATION – APRIL 2026

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MESURES		COMMENTS & RECOMMENDATIONS
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Non-effectiveness of the retrocessions set out in Amendment No. 1 to the Lease agreement	Partially founded	Engage communities for the provision of the cadastral site survey reports.	Continuous	1. Sharing of the cadastral survey reports with the concerned communities.	1. Promote long-term transparency and community trust by systematically sharing land-related information and engaging communities in discussions on land use and boundaries.	Fully aligned	Continuous implementation	It is recommended that Socapalm Mbambou continues to inform communities of the progress of this exercise at bipartite meetings.
		Liaise with the MINDCAF* to progress on the finalization of the process of regularizing the situation of encroached areas in consultation with the stakeholders concerned.	Continuous	1. Documentation of progress and challenges in the regularization process. 2. Organization of a work session with Earthworm Foundation, Socfin Head-Quarter and Socapalm Top Management regarding the retrocession and living space.	1. Regular monitoring and documentation of the regularization process with MINDCAF and stakeholders to ensure transparency and timely updates.	Fully aligned	Continuous implementation	1. Socapalm Mbambou should copy the Prefet in all correspondence with MINDCAF. 2. Socapalm Mbambou should document grievances raised by communities in the action plan and outline steps being taken to address them.

* MINDCAF: Ministère des Domaines et des Affaires Foncières - Ministry of State Property and Land Affairs

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MESURES		COMMENTS & RECOMMENDATIONS
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Lack of land for livelihoods	Not determined	Carry out a study of the impact of Socapalm’s operations on the livelihoods of local communities and implement appropriate actions.	Continuous	1. A study of the impact of Socapalm's operations on the livelihoods of local communities has been carried out in November 2025. 2. Appropriate actions have been identified and implemented; this topic has been integrated into bipartite meetings to collect feedbacks from communities.	1. Ensure regular monitoring of community livelihoods and adjust actions based on study results and community feedback.	Fully aligned	Continuous implementation	1. Socaplam Mbambou should undertake a formal livelihood impact study leveraging existing studies (e.g. ESIA*) and activities (bipartite meetings) that provide useful information for the conduct of such study. 2. Pending the execution of the study and the implementation of appropriate actions identified from it, Socapalm Mbambou should continue implementing actions in the ESIA audit carried out in 2023 which contributes to livelihood improvement of local communities. Discussions during bipartite meetings covering improvement of livelihoods should also continue.

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Lack of land for livelihoods	Not determined	Continue to encourage communities to diversify their income-generating activities (agricultural or other sectors).	Continuous	1. Awareness-raising during bipartite meetings about opportunities for diversifying income sources. 2. Identification of local initiatives or groups already engaged in alternative activities.	1. Support and monitor local initiatives for income diversification through regular dialogue and follow-up during bipartite meetings.	Fully aligned	Continuous implementation	Considering that the bipartite meetings which are used to sensitize communities on diversifying income sources and identifying local initiatives are attended by community representatives only, Socapalm Mbambou should develop and implement a program that engages entire communities in the identification of initiatives or groups engaged in alternative income activities.

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Sexual harassment: violence against women employees by their colleagues at Socapalm	Founded	Build the capacity of members of the Gender Committee in terms of their duties and the process for registering and handling complaints.	Continuous	1. Continuous training and support provided to the Gender Committee on their roles, complaint registration, and management procedures. 2. Initial awareness sessions conducted for employees on gender-based violence prevention and the role of the Gender Committee.	1. Ensure permanent integration of gender-based violence prevention in staff induction and regular awareness sessions for all employees. 2. Establish a simple monitoring system (e.g., quarterly internal review of complaints and actions taken by the Gender Committee) to ensure continuous improvement. 3. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	

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Sexual harassment: violence against women employees by their colleagues at Socapalm	Founded	Provide relay points with documentation on complaints and/or cases reported.	Continuous	1. Provision of a standardized complaints register to each relay point. 2. Basic guidance provided on how to fill out and maintain the register.	1. Regular monitoring of the registers and support to relay points to ensure proper documentation and follow-up. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	

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Sexual harassment: violence against women employees by their colleagues at Socapalm	Founded	Implement a communication strategy dedicated to the Gender Committee (posters of Socapalm’s internal policies on gender equality, toll-free number, etc.).	Continuous	1. Intensification of poster display across sites. 2. Creation and deployment of specific posters about the Gender Committee (roles, contacts, gender equality policy, ethics assistance hotline).	1. Ensure regular update and renewal of communication materials to keep messages visible, clear, and adapted to the context. 2. Integrate the Gender Committee communication in all Company communication channels (e.g., internal magazine, staff meetings, community events). 3. Commitment and implementation of the “Socfin Group Sexual Harassment and Violence Action Plan”.	Fully aligned	Continuous implementation	It is recommended that worn-out posters in all communities should be replaced.

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Sexual harassment: violence against women employees by their colleagues at Socapalm	Founded	Draw up and implement a supporting protocol for victims of gender-based violence.	Continuous	1. Drafting the protocol. 2. Distribution to all sites. 3. Organization of awareness sessions.	1. Ensure the protocol is regularly reviewed and updated based on feedback from the Gender Committee, victims, and field experience. 2. Integrate the protocol into induction and refresher training for Managers, the Gender Committee, and key staff. 3. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	It is recommended that Socapalm Mbambou should add additional measures on the implementation of the protocol notably those bothering on monitoring and record keeping which are already being implemented.

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Sexual harassment: violence against women employees by their colleagues at Socapalm	Founded	Ensure the confidentiality and security of the information and actors involved in handling complaints relating to gender issues.	Continuous	1. Awareness sessions for workers and Gender Committee members on confidentiality and data protection. 2. Memo from the General Manager to remind staff of best practices and specify that non-compliance may lead to sanctions. 3. Clear mention of confidentiality requirements in bipartite reports.	1. Integrate confidentiality and data protection requirements into the Company's internal procedures and code of conduct. 2. Periodically assess compliance with confidentiality practices during internal audits or Gender Committee reviews. 3. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	

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Water pollution	Not determined	Involve communities as much as possible in the process of sampling and analyzing river water in order to increase the level of credibility and acceptance of the results.	Continuous	1. Communities are involved in the process of sampling and analyzing river water in order to increase the level of credibility and acceptance of the results.	1. Regularly engage communities through quarterly bipartite meetings and involve their representatives during the annual water analysis to ensure transparency and trust, supported by clear documentation.	Fully aligned	Continuous implementation	Socapalm Mbambou should continue to send requests to the communities to send nominee(s) to witness water analysis. It should further engage Mbimbé and Dikola communities to encourage them to participate in the river water sampling.
				2. Keep an attendance list proving the representative's presence during sampling.		Fully aligned	Partially implemented	It is recommended that attendance should always be documented by Socapalm Mbambou for the river water sampling process.
				3. Share results transparently with community representatives.		Fully aligned	Continuous implementation	

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Water pollution	Not determined	Ensure that sampling points are respected and document all incidents affecting these sampling points that may justify changing them.	Continuous	1. Physical identification of sampling zones with signs and geographic coordinates for clear and precise location. 2. Mapping of sampling points within the plantation for easy planning and monitoring. 3. Record any change or incident to a sampling point in the incident register. Ensure that each change is documented, justified, and communicated to the affected communities.	1. Regularly monitor and verify sampling points on-site to ensure they are respected and update documentation promptly if any changes are needed.	Fully aligned	Continuous implementation	

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Difficulties accessing drinking water	Partially founded	Share copies of results of borehole water analyses carried out in communities with local residents.	Continuous	1. Presentation of water quality parameters during bipartite meetings. 2. Results are provided to communities against acknowledgment of receipt.	1. Establish a routine to systematically share borehole water analysis results with communities during regular bipartite meetings, ensuring transparency and community trust.	Fully aligned	Continuous implementation	
		Continue to explore with the communities alternative ways of supplying drinking water that Socapalm Mbambou could support (connections to existing networks, etc.).	Continuous	1. Regular discussions with communities during bipartite meetings to explore and identify alternative drinking water solutions.	1. Maintain regular dialogue with communities through bipartite meetings to identify and support sustainable alternative drinking water solutions.	Fully aligned	Continuous implementation	

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Difficulties accessing drinking water	Partially founded	Implement the action plan resulting from the drinking water infrastructure inventory report.	Continuous	1. Clarification by the General Manager on the procedures for managing boreholes. 2. Development of an action plan for boreholes with non-compliant parameters.	1. Ensure regular review and update of the borehole action plan during bipartite meetings, with follow-up on corrective actions for non-compliant boreholes.	Fully aligned	Continuous implementation	It is recommended to add measures that clearly address implementation of the action plan notably those bothering on monitoring which are already being implemented. For example, monitoring progress of actions taken to address non-compliant parameters, etc.

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Violation of labour rights	Partially founded	Provide each CVV* employee with his or her NSIF** registration number.	Continuous	1. Regular monitoring to ensure that all CVV members receive and are informed of their NSIF registration number.	1. Integrate the communication of NSIF numbers into the process of appointing or renewing CVV members, and keep records updated.	Fully aligned	Partially implemented	Socapalm Mbambou should ensure that all CVV Agents are registered and informed of their registration numbers.
		Ensure employment conditions of CVVs are in line with regulations (compliance with annual leave entitlement, taking account of night baskets, drawing up employment contracts, etc.).	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	Continuous implementation	It is recommended that Socapalm Mbambou ensures the effective implementation of monitoring results by the CVV Management to ensure full legal compliance (e.g., providing work contracts for CVV Agents, etc.).

* CVV: Comité Villageois de Vigilance - Village Vigilance Committee

** NSIF: National Social Insurance Fund

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Limited access to positions of responsibility for members of local communities	Partially founded	Increase the number of information channels within communities to ensure that they are made aware of job opportunities for positions of responsibility.	Continuous	1. Communication of job opportunities to communities with acknowledgement of receipt to ensure information has been shared.	1. Establish and maintain multiple communication channels within communities (meetings, notice boards, local representatives) to ensure timely and wide dissemination of job opportunities.	Fully aligned	Continuous implementation	

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Other recommendations	Additional recommendation proposed by EF	Draw up and implement a procedure setting out the steps to be followed when apprehending a suspect.	Continuous	1. Creation of a memo detailing the key steps to follow in the event of theft, misappropriation, or other incidents. 2. Provide awareness sessions to CVV members and security personnel during induction and conduct annual refresher training. 3. Establishment of a compliance monitoring mechanism for identifying and controlling CVV through census, checklist and inspection.	1. Ensure regular updates of the procedure based on feedback and incidents, and include it in refresher training for CVV and security staff.	Fully aligned	Continuous implementation	
		Review the data collection structure at the medical centre in order to be able to clearly identify the members of each riparian community who have benefited from healthcare.	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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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MESURES		RECOMMANDATIONS
						ALIGNEMENT	STATUT	
Other recommendations	Additional recommendation proposed by EF	Communicate statistical data on the Bon Samaritan initiative at bipartite meetings.	Continuous	1. Creation of a summary table of medical services provided to communities. 2. Monthly monitoring of consultations. 3. Sharing of information during bipartite meetings.	1. Ensure continuous communication on healthcare services provided to communities through bipartite meetings and other relevant channels.	Fully aligned	Continuous implementation	

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