

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

Closing meeting – 18 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 Inform 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 - Mbongo to address allegations and evaluate their alignment with recommendations made by EF*.
- Assess effectiveness of measures implemented.

Scope

- Socapalm - Mbongo operations.
- EF's investigation of allegations against Socapalm - Mbongo .
- Actions and measures in Socapalm - Mbongo 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
Thursday 16 April 2026	• Opening meeting (Monday morning) • Document review • Interviews with management and key staff (Community Relations, Gender Committee, Sustainability Team, CVV, Security agents)
Friday 17 April 2026	• Consultations with selected communities (Mbanda, Mbongo and Pitti-Dibamba) • Observations of community infrastructure: ○ Noticeboards in communities and workers' camp ○ Community sheds, etc.
Saturday 18 April 2026	• Closing meeting (morning)



S O C A P A L M M B O N G O – 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 MBONGO – PROFOREST VERIFICATION – APRIL 2026

SOCAPALM MBONGO – KEY ELEMENTS

Earthworm Foundation

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

Feb. 2025 – Mar. 2026

Socfin publications of action plans

Apr. 2026

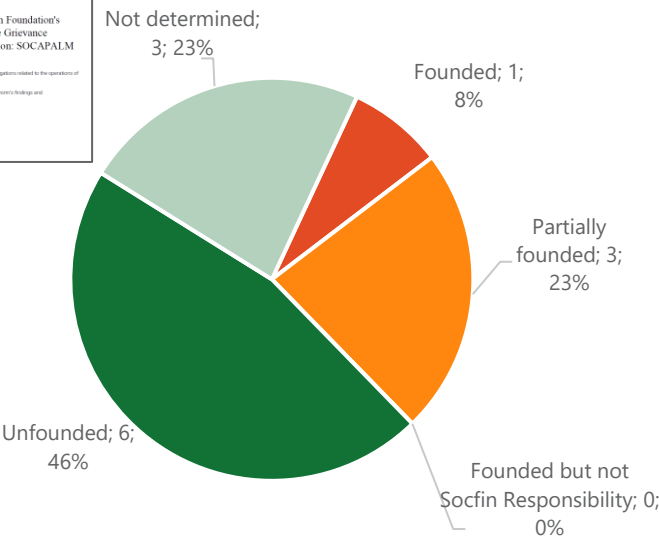
Proforest mission

13 allegations

22 actions

24 measures verified

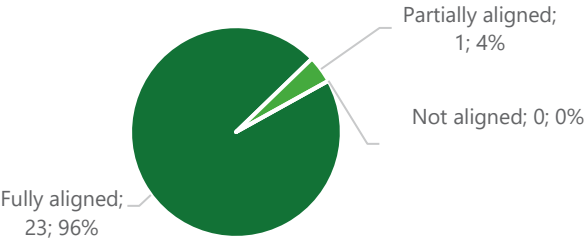
Allegations findings



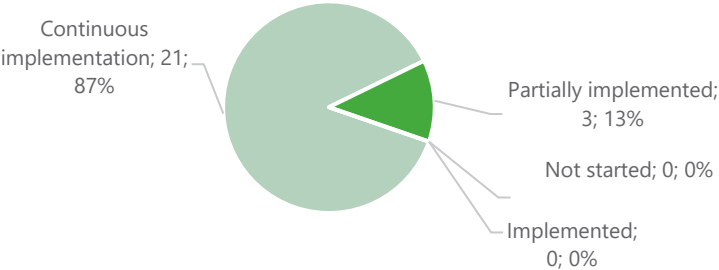
- #1: February 2025
- #2: June 2025
- #3: September 2025
- #4: December 2025
- #5 : March 2026 → **closing of all the actions**

SOCAPALM MBONGO – ACTION PLAN – MARCH 2026									
ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION				TIMEFRAME		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY	
Occupation of sacred sites by plantations	Not determined	Clarify the boundaries of sacred sites in a participatory manner and make appropriate arrangements.	Done	1. An external study was conducted to identify sacred sites; no sacred sites were identified. 2. The findings of the study were shared with communities during separate meetings to ensure transparency. 3. Communities were invited to report any sacred sites they consider important at any time.	1. Maintain dialogue with communities to ensure sacred sites are identified if existing and reported. 2. Continuous updated management plans.	Dec 2025	/	/	

Alignment of measures



Status of implementation of measures



S O C A P A L M M B O N G O – 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 MBONGO – PROFOREST VERIFICATION – APRIL 2026

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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 Mbongo continues to inform communities of the progress of this exercise at bipartite meetings
		Liaise with the MINDCAF* to progress on the finalisation of the process of regularising the situation of encroached areas in consultation with the stakeholders concerned.	Continuous	1. Documentation of progress and challenges in the regularization process. 2. Organisation 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	It is recommended that Socapalm Mbongo 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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Lack of land for livelihoods	Not determined	Carry out a study of land use by neighbouring communities in critical villages in order to gain a better understanding of land use and implement appropriate actions.	Continuous	1. Initial data collection through discussions with community leaders and local stakeholders. 2. Mapping of key land use areas based on available information.	1. Ensure regular monitoring of community livelihoods and adjust actions based on study results and community feedback.	Fully aligned	Partially implemented	1. Some existing studies (e.g. participatory social mapping) provide limited understanding of land use by the communities, thus, Socaplam Mbongo should conduct a full study of land use by neighbouring communities. 2. Socaplam Mbongo should also add a measure on implementing appropriate actions identified from the land use study to address recommendations from the study.

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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 Mbongo 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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Occupation of sacred sites by plantations	Not determined	Clarify the boundaries of sacred sites in a participatory manner and make appropriate arrangements.	Continuous	1. An external study was conducted to identify sacred sites; no sacred sites were identified. 2. The findings of the study were shared with communities during bipartite meetings to ensure transparency. 3. Communities were invited to report any sacred sites they consider important at any time.	1. Maintain dialogue with communities to ensure sacred sites are identified if existing and respected. 2. Continuous updated management plans.	Partially aligned	Continuous implementation	1. Based on the outcome of the tripartite meeting among Socapalm Mbongo, Delegation from the Department of Arts and Culture and affected villages, Socapalm Mbongo together with the affected communities should participatorily update the participatory maps to clearly show boundaries of the sacred sites. 2. If sacred sites are found to be within the concession, Socapalm Mbongo with the affected communities should delineate these areas in line with the agreed boundaries. Socapalm Mbongo should then develop and implement management plans for the sites.

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Sexual harassment: violence against women employees by their colleagues at Socapalm	Founded	Build the capacity 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	Update the list of Gender Committee members by replacing members who have resigned.	Continuous	1. The list of Gender Committee members has been updated to reflect replacements. 2. The updated list has been shared and posted on site. 3. At quarterly meetings, the list is reviewed to ensure it is up to date, and this is recorded in the meeting minutes.	1. Ensure the Gender Committee list is regularly reviewed and updated as part of routine quarterly monitoring. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	
		Publicize the Gender Committee's activities so that the focal points are known and available.	Continuous	1. During Gender Committee activities, the presence and role of focal points on site are regularly reminded. 2. Contact details of focal points are displayed on site notice boards.	1. Maintain regular communication to ensure all workers are aware of the Gender Committee focal points and their availability. 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 communities such as Mbongo and Pitti-Dibamba 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 Mbongo 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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Sexual harassment: violence against women employees by their colleagues at Socapalm	Founded	Allocate time to members of the Gender Committee to implement their activities.	Continuous	1. Establishment of an activity calendar for Gender Committee members.	1. Integrate dedicated time for Gender Committee activities into the regular work schedule to ensure sustained participation and effectiveness. 2. 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 analysing 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 analysing 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	
				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 Mbongo 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 communities alternative ways of supplying drinking water that Socapalm Mbongo 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 and analysis of the constructions of new boreholes in accordance with the sustainability strategy if needed.	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	It is recommended that Socapalm Mbongo ensures 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 Mbongo 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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Other recommendations	Additional recommendation proposed by EF	Draw up and implement a procedure setting out the precise 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 neighbouring 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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Other recommendations	Additional recommendation proposed by EF	Communicate statistical data on the Bon Samaritain 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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