Socfin-KCD & Coviphama - Action Plan

April 2025



ALLEGATIONS	ACTIONS	TIMEFRAME	NEW TIMEFRAME	REASON FOR DELAY	CURRENT STATUS
Violations of Indigenous Peoples' rights to collective ownership	Continue to communicate the companies' position regarding Bunong people as Indigenous People: through Sustainability reports and internally.	Continuous	/	/	Continuous
	Continue implementing specific measures in line with their status, such as supporting and promoting their culture through participation in traditional ceremonies and similar activities.	Continuous	/	/	Continuous
Irregularities in the approval process of the concessions (ESIA¹ completion, clearing process)	Continue working with authorities to ensure compliance with the requirements of the Ministry of Environment related to the full Environmental Impact Assessment.	June 2026 (Depending on RGC ²)	/	/	Started
Flawed compensation program (Socfin-KCD)	Continue the implementation of the mediation on related farmland.	December 2026	/	/	Started

¹ ESIA: Environmental and Social Impact Assessment

² RGC: Royal Government of Cambodia

ALLEGATIONS	ACTIONS	TIMEFRAME	NEW TIMEFRAME	REASON FOR DELAY	CURRENT STATUS
Forced evictions due	Integrate FPIC ³ principles in all engagements with communities.	Continuous	/	/	Continuous
to failure to	Develop and put in place a clear stakeholder engagement strategy.	June 2025	/	/	Started
respect communities' rights to FPIC ³ (Socfin-KCD)	Continue the implementation of the outcomes of the mediation process and ensure any grievances related to compensation and land claims are addressed.	Continuous	/	/	Continuous
The livelihoods of the Bunong people were impacted	Conduct a study on the impact of Socfin-KCD and Coviphama operation on local community livelihoods and put in place an appropriate action plan.	December 2026	/	/	Started

³ FPIC: Free, Prior, and Informed Consent

04/2025

ALLEGATIONS	ACTIONS	TIMEFRAME	NEW TIMEFRAME	REASON FOR DELAY	CURRENT STATUS
Poor working conditions related to transport conditions, working hours, health and safety	Establish a monitoring system to ensure that contractors implement all contract requirements.	June 2025	/	/	Started
	Ensure that all contractors' workers are registered to NSSF ⁴ .	June 2025	Continuous	Continuous surveillance to all new workers	Continuous
	Ensure that all security agents go through medical check-ups before starting to work.	June 2025	/	/	Done
	Work with workers' representatives to find a better approach to reflect their night wage pay in the wage slip.	March 2025	/	/	Done
	Ensure that overtime of subcontractor workers is paid at the correct rate.	-	/	/	Done
	Ensure the transport conditions of employees are appropriate (protection against sun or rain, appropriate seats).	June 2025	/	/	Started
	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.	June 2025	/	/	Started
	Review the risk assessment in order to provide appropriate PPE ⁵ to workers accordingly.	March 2025	June 2025	Risk Assessment not completed for all operations	Started

⁴ NSSF: National Social Security Fund

⁵ PPE: Personal Protective Equipment

ALLEGATIONS	ACTIONS	TIMEFRAME	NEW TIMEFRAME	REASON FOR DELAY	CURRENT STATUS
Threats and intimidation of communities	Publicize with external stakeholders the Socfin policy on non-intimidation and respect of human rights.	June 2025	/	/	Started
Lack of transparency in the mediation process	Continue to work with communities to clarify deadlines and terms and conditions related to implementing the mediation agreements.	December 2025	/	/	Started
	Ensure that all complaints raised during the implementation of the mediation outcomes are recorded and addressed properly.	March 2025	/	/	Done
	Work with all the parties involved in the mediation process to extend the removal of the NDA ⁶ already done for the PHF ⁷ to the whole process.	December 2025	/	/	Started
	Conduct a periodical review of the implementation of the mediation outcomes and put in place if necessary appropriate actions.	Continuous	/	/	Continuous
Destruction of sacred sites	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.	December 2025 (depending on RGC ⁸)	/	/	Started
	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.	December 2026	/	/	To start
	Continue the implementation of the mediation on communal land agreements.	Continuous	/	/	Continuous

^{04/2025 &}lt;sup>6</sup> NDA: Non-Disclosure Agreement ⁷ PHF: Plantation d'Hévéa Familiale

⁸ RGC: Royal Government of Cambodia

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