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1. OBJECTIVE

The purpose of this policy is to establish internal and external communication procedures associated with ISO 9001,14001, OHSAS, RSPO, FSC, IFC and or other issues identified, so they can be acted upon and documented effectively.

2. APPLICATION FIELD

This procedure includes communication, participation and consultation internally and externally of OOPC.

3. ABBREVIATIONS

IMS	Integrated Management System
OOPC	Okomu Oil Palm Company
HSEM	Health Safety and Environment Manager
MD	Managing Director
HOD	Head of Department
CO	Communication Officer
EMS	Environmental Management System
JCC	Joint Consultative Committee
RSPO	Roundtable on Sustainable Palm Oil
OHSAS	Occupational Health and Safety Assessment Series
FSC	Forest Stewardship Council
CLO	Company Liaison Officer
IFC	International Finance Corporation
ISO	International Organization for Standardization

4. DEFINITIONS

4.1. Internal communication


Is the communication between OOPC personnel within the organization, including communication with contractors or visitors of OOPC.

4.2. External communication:

Is communication made by OOPC with organizations/agencies, press and individuals outside the organization of OOPC.

4.3. Consultation:

Is communication delivered from the Manager/subordinate to the level of socialization such as company policies and/or change of management (structure and responsibility).

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4.4. **Non conformity:**

Is when service/product does not meet up with a recognized standard. Non conformity is addressed through forms GF01, GF04 and GF07, depending on the type of non-conformity experienced.

4.5. **Procedure:**

Specified way to carry out an activity or a process

4.6. **Record:**

Document stating results of evidence of activities performed

5. **RESPONSIBILITY**


HSEM is responsible for ensuring that this procedure is implemented and monitored.

HOD will maintain internal communication within the department.

CO will maintain constant communication with all stakeholders by:

- Facilitating constructive dialogue between and among external stakeholders, responding to enquiries about the company.
- Attend town hall meetings with communities as per General Stakeholders Management Plan (OOPC/Form 1.47)
- Ensuring harmonious interactions with the press/media houses and liaising with media houses for interview with the MD.
- Manage the company's website/social media and publish any worthy article on the website or social media.
- Ensuring that all reviews/rebuttals about OOPC/Socfin in the media are communicated to Socfin group via e-mail weekly.
- Maintaining internal communication by disseminating any necessary information to employees through memos and/or through the In-House publication called "The Okomu Parrot".
- Ensuring quarterly meetings of the JCC and the deliberations thereof shall be published for the consumption of the company's internal audience.

MD will endorse all communication concerning OOPC before publication and communicate with employees, shareholders and stakeholders associated with OOPC following clauses 6.1, 6.2, and 6.3 below.

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6. PROCEDURE

6.1. Internal Communication

This pertains to communicating ISO, OHSAS, RSPO, FSC, IFC directives and any other issues in the organization, such as policies and quality objective programs, procedures, work instruction and other information to the staff, visitors, suppliers and contractors of the organization as at when requested and/or required.


This is achieved through one or more of the following documents: minutes of meetings, management reviews, internal office meetings, socializing, briefings, circulars, memos, letters, fax, emails, internet, newsletter and board meeting, Nonconforming service/corrective/preventive action report GF07, Nonconforming product/corrective/preventive action report GF01, Nonconforming Safety/Environment GF04. Communication with contractors is facilitated using the HSE Contractor Regulation Form and Trainings while HSE Introduction for Visitors is used to pass relevant information with visitors to Okomu. Also communication within the organization is from top management to staff and vice versa.

6.2. External Communication

This pertains to information related to ISO, OHSAS, RSPO, FSC, IFC directives and other related issues received from external parties such as government, local communities, stakeholders, press and other external parties (see Procedure GP28). Customer complaints are documented on GF02 and handled following procedure GP24.

OOPC will use the tools stated in clause 9 herein below mentioned in this procedure to communicate, interact with and disseminate information regarding the operations and management of the company to shareholders, stakeholders and the general public. Annual Reports and Accounts will aim to ensure that they are presented in plain language, readable and understandable and consistent with previous reports. All correspondence with shareholders and other stakeholders would be timely, accurate and will give a balanced and fair view of the company including its non-financial matters. This communication policy as well as the company's annual reports and other relevant information about the company are published on the company's website (www.okomunigeria.com).

Communications such as letters, memos etc received from interested external parties are acknowledged by a stamp of the MD or receiving authority and are filed accordingly after due and prompt response in form of e-mail, letters, website report etc has been initiated depending on the source and the content of the information. A review of press reports and articles concerning OOPC and/or Socfin are updated in Socfin's press review sheet and sent to cs@socfin.com each Wednesday morning. Employees, contractors, suppliers or third party contract workers are prohibited from disclosing any non-public information or to communicate externally on behalf of the company. Where such information is required, employees shall refer such request to their HOD or CO. Anything contrary to this will be seen as a personal opinion.

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6.3. Communication, Participation and Consultation

This is achieved through Customer satisfaction questionnaire GF02, including potential hazards/accident investigation reports and safety talks. Copies of minutes of departmental, CLO and all stakeholders meetings should be sent to the MD, HSEM and CO to keep them abreast of activities in the various departments/communities and documentation purpose.

Participation and consultation of workers for issues concerning their occupational health and safety and any effect on the environment is strengthened through the HSE Committee representatives who attend a monthly meeting and give feedback through safety talk and departmental meetings. The workers are also involved in Hazard Identification and Incident investigation.

7. PUBLICLY AVAILABLE DOCUMENTS

In line with RSPO requirements (especially Indicator 1.2.1 under RSPO Principles and Criteria), the following list of documents are available upon request to the following contact address: info@okomunigeria.com or hsesec@okomunigeria.com

- Company's Policies
- Internal and External Communication Procedure;
- Certificate of Occupancy and Deed of Assignment;
- Occupational Health and Safety plans;
- Environmental Impact Assessments and Management Plans;
- Social Impact Assessments and Management Plans;
- High Conservation Value documentation;
- Waste and Pollution Management Procedure;
- Environmental and Social Monitoring Reports
- Grievance Management Policy/Procedure;
- Details of complaints and grievances;
- Negotiation and Compensation procedures;
- Continual improvement plans;
- Summary of certification assessment report.


Summary of requests for environmental, social and/or legal information and responses shall be available on OOPC/Form 1.72 maintained by the Communication Officer and MD's Secretary. Responses to request will be provided within 14 working days of receipt.

8. PROCESS INPUTS

- Grievance – Receipt and Record Form (OOPC/Form 1.53)
- Audit report
- Management review
- Letter of Request for Information

9. PROCESS OUTPUT

- Management Review
- GF 01, 02, 04, and 07

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- Tool box meeting
- Minutes of meetings
- HSE Committee Minutes of meetings
- Internal newsletter
- OOPC website (www.okomunigeria.com)
- HSE Regulation Forms
- Press Review
- OOPC/Form 1.47
- Response to request for Information
- OOPC/Form 1.72
- Grievance – Resolution and Investigation Form (OOPC/Form 1.54)
- Annual Reports and Accounts

10. RECORDS


- a) Minutes of meetings
- b) HSE Committee Minutes of meetings
- c) Internal Newsletter
- d) Copy of memos to notice boards
- e) Customer satisfaction questionnaire
- f) Management review
- g) GF 01, 02, 04, and 07
- h) HSE Regulation Forms
- i) Tool box meeting (safety meeting)
- j) Socfin Press Review (excel sheet)
- k) The Okomu Parrot
- l) OOPC/Form 1.72
- m) Annual Reports and Accounts

11. REFERENCES

- a) ISO 9001:2015 Clause 5.2.2 and 7.4
- b) ISO 14001:2015 Clause 7.4
- c) OHSAS 18001:2007 Clause 4.4.3
- d) IMS manual
- e) Socfin Group Standard Operating Procedure: Press Review
- f) RSPO Criteria 6.2
- g) FSC Criteria 7.4 and 8.5
- h) IFC (2012) Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts; GN 90-113.
- i) Code of Corporate Governance (Part H)

12. REVISION STATUS

Rev.	Date	Details
0	23/10/13	Initial release

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1	14/12/15	<p>Changed function of Preparer on cover page</p> <p>Changed name and function of verifier on cover page</p> <p>Reconstruction of Sentence in Section 1</p> <p>Removed Procedure and Record from Section 3-Abbreviations</p> <p>Added JCC, RSPO, OHSAS,FSC and IFC in Section 3-Abbreviations</p> <p>Added §4.5 & §4.6 in Section 4-Definitions</p> <p>Added Section 5 – Responsibility</p> <p>Addition of new sentences in §6.1, 6.2 and 6.3</p> <p>Added Press review in Section 7-Process Output</p> <p>Added Socfin Press Review (excel sheet) and The Okomu Parrot in Section 8-Records</p> <p>Added Socfin Group Standard Operating Procedure: Press Review and RSPO Criteria 6.2 in Section 9-References</p>
2	27/10/16	<p>Addition of “GF04 Nonconforming Safety/Environment” in § 6.3</p> <p>Addition of GF04 in Section 7 – Process Output</p> <p>Addition of GF04 in Section 8 – Records</p>
3	01/11/16	<p>Addition of Paragraph in §6.3</p> <p>Addition of ‘HSE Committee Minutes of meetings’ in Section 7 & 8</p>
4	21/03/17	<p>Added “9001 & 14001” to Section 1 – Objectives</p> <p>Added “ISO” in section 3 – Abbreviations</p> <p>Changed ISO 9001:2008 Clause 5.5.3 and 7.2.3 to ISO 9001:2015 Clause 5.2.2 and 7.4 and ISO 14001:2004 Clause 4.4.3 to ISO 14001:2015 Clause 7.4</p> <p>Changed Logo in Header</p> <p>Addition of Grievance in Section 7 – Process Output</p>
5	23/10/17	<p>Added “Gbenga Oyebode” as Approver on the Front page and Christian Mariere as Verifier</p> <p>Addition of Section 7- Publicly Available Documents</p> <p>Addition of new sentences in §6.2</p> <p>Addition of Points in Section 8,9,10.</p>
6	01/02/18	<p>Addition of new sentences in §6.1</p> <p>Changed document connotation from Procedure to Policy</p> <p>Added ‘Code of Corporate Governance’ in Section 11- References</p>