OKOMU OIL PALM COMPANY PLC

PROCEDURE

STAKEHOLDERS ENGAGEMENT

Action	Name	Function	Date	Signature
Prepared by	Mikle George	HSE Manager		
Verified by	Olise Fidelis Ikponmwosa Osunbor	Communication Officer HRM		
Approved by	Dr. Graham Hefer	Managing Director		

TABLE OF CONTENTS

1. OBJECTIVE

The purpose of this procedure is to define how and why OOPC engages with internal and external stakeholders for all OOPC operation.

2. APPLICATION FIELD

This procedure applies to all stakeholders associated with OOPC.

3. ABBREVIATIONS

REC   Record
MD   Managing Director
HSEM   Health Safety& Environmental Manager
IMS   Integrated Management System
OOPC   Okomu Oil Palm Company
HRM   Human Resources Manager
HRD   Human Resource Department
HOD   Head of Department
CLO   Community Liaison Officer
GDP   Gross Domestic Product
NGO   Non-governmental organization
CO   Communication Officer
ISO   International Organization for Standardization
RSPO   Roundtable on Sustainable Palm Oil
EF   Earthworm Foundation

4. DEFINITIONS

- **Grievance:** is a concern or complaint raised by an individual, group, or community in relation to activities undertaken by OOPC.
- **Collective Grievance:** is a complaint raised by two or more employees in a unionized workplace.
- **Internal Stakeholders**: Employees, Contractors, Suppliers, and Union.
- **Internal Grievance mechanism**: internal dispute resolution by which an employee may have his or her grievances addressed.
- **External Stakeholders:** includes, *inter alia,* Communities, Government organizations/institutions, NGOs, shareholders and customers that are affected by or have an interest in OOPC activities, products and/or performance.
- **Engagement**: actions taken by OOPC to communicate understand and involve stakeholders in the decision-making processes when appropriate.
- **Stakeholder Engagement Plan (SEP):** system used to identify stakeholders and manage engagement based on the level of interest and influence an individual or group has on company operations.

- **Socioeconomic Indicator:** A tool used to understand an individual or a group's status within their local environment which can include GDP, life expectancy, literacy and levels of employment, in addition to freedom of expression, personal safety and participation in civil society.
- **Partnership:** Agreement between OOPC and a third party to develop projects or engagement activities through shared interests and/or resources.
- **Vulnerable Groups/Individuals:** Vulnerable individuals and groups are potentially more susceptible to negative impacts or have a limited ability to take advantage of positive impacts.
- **Union**: A body under the Nigerian legislation responsible for workers within OOPC.

5. RESPONSIBILITY

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

CLOs/CO will communicate with community leaders within OOPC footprint as stated in OOPC stakeholder management plan (OOPC/FORM 1.47, Annex 1&2).

CO/CLOs must provide minutes of meetings and photos, if applicable, to the HSE and MD of all meetings with the communities for documentation purpose.

CO will maintain constant open communication with relevant stakeholders and ensure that all relevant information pertaining to OOPC is communicated.

MD will ensure constant communication with relevant stakeholders as stated in OOPC stakeholder management plan (OOPC/FORM 1.47, Annex 1&2).

HOD will communicate with stakeholders as stated in OOPC stakeholder management plan (OOPC/FORM 1.47, Annex 1&2).

HRM will communicate with stakeholders as stated in OOPC stakeholder management plan (OOPC/FORM 1.47, Annex 1&2).

Estate Manager will ensure all OOPC approved projects are done according to plan and provide updates to the MD, CO and the HSE department on at least a quarterly basis to keep them abreast of developments with projects, and for documentation purpose.

Company Secretary will provide relevant information to Security and Exchange Commission on a quarterly basis and provide updates to the MD, CO and the HSE department to keep them abreast of developments in respect of OOPC, and for documentation purpose.

6. STAKEHOLDER ENGAGEMENT OVERVIEW

Stakeholders are individuals and groups that are directly or indirectly affected by OOPC activities, in addition to those that may have interests in or influence over OOPC. This interest or influence can affect projects, activities, products or the performance, either positively or negatively, of OOPC. Stakeholders include local communities or individuals living inside OOPC's foot print, their representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests.

Stakeholder engagement is a broad term used to describe all activities and interactions between OOPC and its stakeholders.

6.1. Why Stakeholders engage

Stakeholder engagement helps build trusting relationships and opens up lines of communication between OOPC and stakeholders. Communication reduces risks to OOPC by identifying and dealing with issues as they arrive, thus improving the reputation of OOPC in the eyes of all stakeholders.

Stakeholder engagement spans all phases of the project and operation lifecycle, with different stakeholders able to influence each activity.

7. PROCEDURE (Stakeholder Engagement Strategy)

OOPC uses this procedure to engage with stakeholders and it is driven by a commitment to openness and transparency and a respect for the views of stakeholders. This procedure and strategy aims to harmonize stakeholder engagement procedures across all operations, opening communication channels and improving working relationships with all stakeholders.

7.1. Stakeholder Identification

Stakeholder identification is the first stage of the engagement process. This will include those both directly affected, such as communities within OOPC's footprint and those indirectly affected such as national or international NGOs. Stakeholders will be determined through OOPC's stakeholder engagement plan (See OOPC/FORM 1.47, Annex 1&2).

	Description
Internal Stakeholders	• Board of Directors • Senior Management • Shareholders • Unions/employees
Industry Stakeholders	• Suppliers

	Description
	• Customers • Industry associations
Government Regulators	• Local agencies/officials • Regional/state agencies/officials • National agencies/officials • International organizations
Communities	• Directly affected communities within OOPC foot print • Community leaders
Civic Organizations	• Places of worship • Local trade or labour Unions • Educational or health organizations • Charitable organizations • Organizations supporting vulnerable groups
Non-governmental Organizations	• Local/regional/state groups • National/international groups • Environmental and Social Groups

7.2. Stakeholder prioritization and mapping

Not every stakeholder group will require the same level of engagement in terms of frequency or method of communication. Once a stakeholder identification exercise has been performed, it is therefore important to prioritize and map groups based on who they are and the level of risk they pose to OOPC operation.

7.3. Method of Engagement

Once stakeholder groups have been prioritized in terms of their level of influence and/or operations, a different method of engagement should be developed for each stakeholder if applicable. The reason for this is that individual stakeholders and groups have different requirements in terms of language, communication materials or method necessary to share and receive information.

Engagement can include: *information sharing*, where OOPC informs stakeholders about its performance or any changes; *response (action)*, which is where OOPC responds to stakeholder requests or complaints; or *consultation*, whereby

communication with stakeholders is two-way and information gathered can be used to influence changes in operations.

Each stakeholder group may require different forms of engagement such as:

- Local Communities: *consultative engagement* may require written communications in the main local languages, allowing communities to respond in the language they operate in. Some members of the community may also require assistance with submitting or reading written materials. Communities may require engagement with several subgroups separately including leaders and vulnerable groups.
- Government Officials: *Informative engagement* is often required, such as sharing of written materials in the national language. Meetings may also be held where communication is verbal, but minutes should be taken and signed by all parties, where applicable and necessary.
- International NGOs: *Responsive engagement* in the form of written reports and media communications aimed at assisting the building of relationships with international NGOs.

The examples provided above are simplified for the purpose of this procedure and it is pertinent to note that some stakeholder groups will require a range of engagement methods. Choosing an appropriate method of engagement for each stakeholder group, depending on their need, will ensure that communication is well received and understood, and can be responded to effectively.

7.4. Information Disclosure

Disclosure means making information accessible to stakeholders and communicating in a manner that is understandable. All types of engagement, from consultation to the resolution of grievances, will be more productive if stakeholders, including affected communities, have accurate and timely information about OOPC's activities, impacts, and any other aspects that may have an effect on them. The type and level of information disclosed is dependent on the priority of each stakeholder, though OOPC will strive to be as transparent as possible as per OOPC code of ethics policy. Information disclosure is based on the following key principles:

- Disclosure Timing: If feedback is required, it is important to share information as early as possible to allow stakeholder's adequate time to review and process what is presented and decide appropriately.
- Meaningful Information: the information will need to be culturally appropriate in a format and language that is easily understandable by the stakeholder.
- Accessibility: stakeholders will require information during engagement, but also acknowledge on how they can access further information, if required.
- Information Sensitivity: It is important to share risks and impacts with affected stakeholders, but how this information is presented can influence their reaction to developments. When information is sensitive, it is important to present just the facts and leave out any uncertainties.

7.5. Stakeholder Consultation

Listening and understanding stakeholder concerns and feedback is a valuable source of information, which can help improve OOPC operations, in addition to helping to identify and address potential risks.

Once stakeholders have been identified and prioritized, and the method and frequency of engagement determined, consultation requirements of each stakeholder should be determined. Consultation with stakeholders will build trust with communities within OOPC footprints and raises awareness.

- Gender-inclusive: men and women often have different views and in some cultures, it is not acceptable for women to be heard in public. Allowing women the time and space to participate is crucial.
- Free: consultation should not be manipulated or coerced.
- Documented: tracking of consultation is important to ensuring key issues are recorded and addressed
- Report back: those consulted will require information on time frame and when they will receive feedback, further information/consultation.
- Consultation, participation and communication is achieved through one or more of the following documents: minutes of meetings, management reviews, internal office meetings, circulars, memos, letters, emails, newsletter and board meeting.
- Ongoing: consultation is to be undertaken throughout the project lifecycle.

7.6. Vulnerable Groups and Gender Considerations

Vulnerability is determined by the ability of an individual or group to cope or adapt to change and can be affected by the social, economic, technological, institutional and cultural resources available. Vulnerable individuals and groups are potentially more susceptible to negative impacts or have a limited ability to take advantage of positive impacts. Vulnerability is often a pre-existing status that is independent of OOPC and may be reflected in an existing low level of access to key socioeconomic or environmental resources or a low status within certain socioeconomic indicators (low or no education, poor health, low status within the community etc.).

Vulnerability varies from location to location and OOPC will determine who is considered vulnerable within their cultural context and consult with them on an ad hoc basis as per OOPC/Form 1.47 and OOPC/Form 1.47 (Annex 1). Generally there are some groups that are more likely to be vulnerable than others due to their status within the society and their ability to access resources. This includes women, elderly, disabled, indigenous groups and the indigent.

In many instances vulnerable groups will require special consideration in terms of engagement, as they may not be able to participate in community wide consultation or engagement activities. This will often require separate meetings

for vulnerable groups and consideration of whether they are fully represented by community leaders.

7.7. Establish Partnerships

In many instances, OOPC can benefit from strategic partnerships with communities, companies, government, NGOs or other stakeholders. This can involve joint activities and collaborative efforts based on a common interest. This is based on:

- Common objectives or strategic interests
- The pooling of cash or in-kind resources from all parties
- Sharing information, transparency and joint fact-finding
- Drawing in on core and complementary competencies
- Sharing risks and benefits, both financial and reputational.

8. GRIEVANCE MANAGEMENT

8.1. Internal Grievance

- Where an internal stakeholder feels aggrieved on any decision or action of management, the issue must first be discussed with his/her immediate superior or manager or the HOD or HRD who will try to resolve the issue as quickly as possible within the time constraints of this procedure. If resolution is accepted by the complainant, it should be stated inOOPC/Form 1.52
- If the stakeholder is not satisfied with the outcome of the meeting with his/her superior or manager or the HOD or HRD, the stakeholder must make it known to HRD or HOD in writing that he/she is not satisfied, stating the reason for their dissatisfaction and the HRD shall follow the applicable clause in grievance procedure.
- If the stakeholder is not satisfied with the decision of the MD, the stakeholder may write formally to the union for intervention.
- Upon the receipt of a formal complaint, the Union shall check if the stakeholder had complied with the above stages.
- If the Union is satisfied that the stakeholder has complied with the above stages, the Union shall request a formal meeting with the MD to discuss the issue.
- If the Union is not satisfied with the meeting with the MD, the union must follow their union constitution.

8.2. Collective Grievance

- Where the union observes, suspects or feels that an aspect of the subsisting collective agreement or company's policy and procedures have been breached, or acts on behalf of a stakeholder or union member, the union can formally write to HRD/HSE stating the aspect of the agreement, policies and procedures that have been breached. The HRD shall fill OOPC/Form 1.53 and
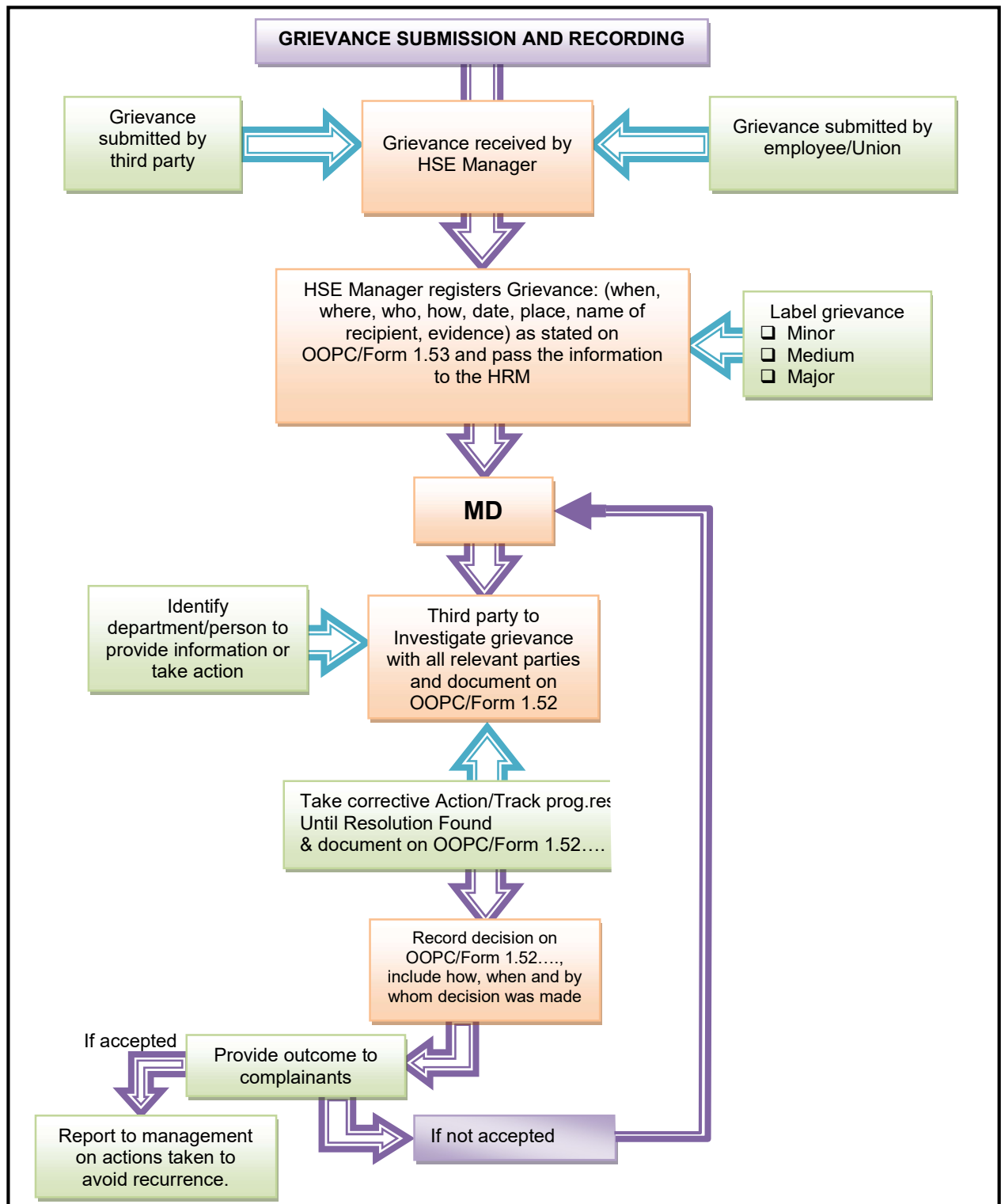
send to the HSE Manager for documentation purpose. The HSE shall document the grievance and send back to HRD

- On receipt of a formal union complaint, the HRD will investigate the claim and thereafter, invite the union representatives to a meeting to resolve the grievance.
- If the grievance is not resolved at the office of the HRD, the grievance will be upgraded to a major grievance and forwarded to the MD.
- If the grievance is not resolved by the MD, the Branch union shall write to the State union executive informing them of the grievance.
- The State union executive will schedule a time to hold a meeting with the MD to find an amicable resolution to the grievance.
- If the grievance is not resolved at the State level, the State union executive will write to the National headquarters informing them of the impasse.
- On receipt of the complaint from the state executive, the National headquarters of the union will strive to resolve the impasse/grievance by having an audience with the MD.
- If the grievance or impasse is not resolved at the level of the National headquarters of the union, the National headquarter will declare a dispute and the Statutory dispute resolution procedure will then be adhered to.
- It will be an offence that will be sanctioned, not to comply with this grievance procedure and all processes of the grievance must be documented on OOPC/Form 1.53, 1.52 and minute, using OOPC Form GF15

8.3. Individual & Collective Grievance Management Process

GRIEVANCE SUBMISSION AND RECORDING

Grievance submitted by third party → Grievance received by HSE Manager ← Grievance submitted by employee/Union

HSE Manager registers Grievance: (when, where, who, how, date, place, name of recipient, evidence) as stated on OOPC/Form 1.53 and pass the information to the HRM

Label grievance
- Minor
- Medium
- Major

MD

Identify department/person to provide information or take action → Third party to Investigate grievance with all relevant parties and document on OOPC/Form 1.52

Take corrective Action/Track prog.res Until Resolution Found & document on OOPC/Form 1.52....

Record decision on OOPC/Form 1.52...., include how, when and by whom decision was made

Provide outcome to complainants

If accepted

Report to management on actions taken to avoid recurrence.

If not accepted

8.4. RECEIPT OF GRIEVANCE

The HSE Manager receives all grievances and ensures OOPC/Form 1.53 is completed. Grievances can be submitted through the following channels:

- OOPC mail box at various locations within OOPC plantation (including Extension 1 and 2).
- OOPC Website: http://www.okomunigeria.com/
- E mail: hsesec@okomunigeria.com
- In writing: Okomu-Udo Ovia South west LGA P.M.B 1449, Benin City, Edo State Nigeria Attention: HSE Department (Grievance section)
- Lagos office- Mandilas Building, 35A, Simpson Street, Lagos Island, Lagos State, Nigeria.

8.4.1   Registration of a Grievance

Once a grievance is received by HRD, and OOPC Form 1.53 is completed, it will be officially acknowledged by HSEM, and then documented and recorded in the HSE database and passed to the MD for further investigation. After resolution, the HRD will respond to the complainant in written form of the resolution achieved.

8.4.2   Investigating unresolved and major Grievances

The MD will assign all investigations to a relevant third party (such as consultants) to resolve these grievances. All investigation should be completed as quickly as possible, but will depend on the nature of the complaint or concern and the required action to be taken. The grievance database should record all actions taken as part of the investigation process, including dates of communications with different departments, responses and expected actions. In some instances, further evidence may be required, which will involve a third party outside of the organization. All grievance investigations must be handled on a strictly confidential manner with no conflicts of interest, personal or professional gain or bias. The HSEM will track all grievances-minor, medium or major.

8.4.3   Recording and Reporting Decisions

All decisions must be recorded on OOPC/Form 1.52 and communicated with all parties involved in writing to ensure that all parties are in agreement. The complainant may not always be satisfied with the resolution on offer, which is why in some instances; several different resolution options may be advisable.

8.5. External grievance

This applies to an external stakeholder who wishes to register a grievance. The grievance should be submitted in writing with the stakeholders contact information on community, government or NGOs letter head. The letter should state the nature and background to the dispute and the proposed solution to resolve the matter.

The submission of the grievance should, at a minimum, include provision of the following:

- Full Name
- Name of Organization (as applicable)
- Address
- Phone No./Fax No./Email Address (at least one contact point)
- Description of the grievance in details
- Evidences to support the grievance

External stakeholders can submit their grievances via the under listed channels:

- The Community Liaison Officer
- OOPC Website: http://www.okomunigeria.com/
- E mail: hsesec@okomunigeria.com or transparency@socfin.com
- In writing to:
  - Okomu-Udo Ovia South west LGA P.M.B 1449, Benin City, Edo State Nigeria Attention: HSE Department (Grievance section) or through the Community Liaison Officer or Communication Officer; or
  - Socfin S.A.
    Attn.: Grievance Coordination Team
    4, Avenue Guillaume
    1650 Luxembourg
    Grand-Duché de Luxembourg

OOPC's grievance procedures and social and environmental standards shall be communicated to all interested and affected stakeholders through strategies identified in its stakeholder communication strategy.

EXTERNAL GRIEVANCE MANAGEMENT PROCESS

Complaint and Evidence from Stakeholders

(Local community, NGOs, Cooperative whistle blower)

- Importance to Company
- Importance to affected Stakeholders
- Clarification of grievances

Receipt by CLOs, CO & HSEM

Grievance Type
- Minor
- Medium
- Major

Initial Review OOPC/Form 1.53

Preliminary Fact Finding by compiling evidence/Proof and validation. Acknowledgment/record by HSEM. If Major, pass to Socfin Grievance Coordination Team. If Minor or medium, then forward to the HRM who passes it to

Case Closed

Clarify to complainant

If not accepted

MD

To Proceed? — No

Yes

Fact finding

| Interview (including witnesses) | Meeting with stakeholders | Stakeholder Engagement |

- Documented Evidences
- Fact Finding Summary
- Cause & Effect analysis

Investigation

Priority Setting

Verify findings

- Time-bound action plan

Review & Update Action Plan/Corrective and Preventive Action

Communications

Monitoring & Progress Update

Resolution/Settlement OOPC/Form 1.52

Case Closed

Guiding Principles of Complaint Resolution through Stakeholder Engagement

- Objective
- Fair & Equitable
- Integrity
- Balanced interest
- Constructive engagement (win-win approach)
- No intimidation or instigation of violence by all parties involved
- Compliance to Law & Regulation

8.5.1.1 Interpretation of the External Grievance Management Process

A Complaint/evidence is received from stakeholders through the recognized channels (see 8.5), with an initial review done by the HSEM, CO or CLOs and acknowledged by the HSEM, who will forward all to the MD to indicate whether to proceed. If "**NO,**" the grievance will be clarified to the complainant by the HSEM and closed, but if complainant is not satisfied, it will be referred back to the MD for further decision. If "**YES**", the grievance investigation will proceed using the fact finding approach by conducting various interviews (witnesses inclusive), meetings with stakeholders and stakeholders' engagement, if necessary. In addition to grievances submitted through the official channels listed in 8.5 above, issues raised through unofficial channels, such as the media and the internet, will be recorded as grievances on request by either EF or Socfin, as per described in the following chart.
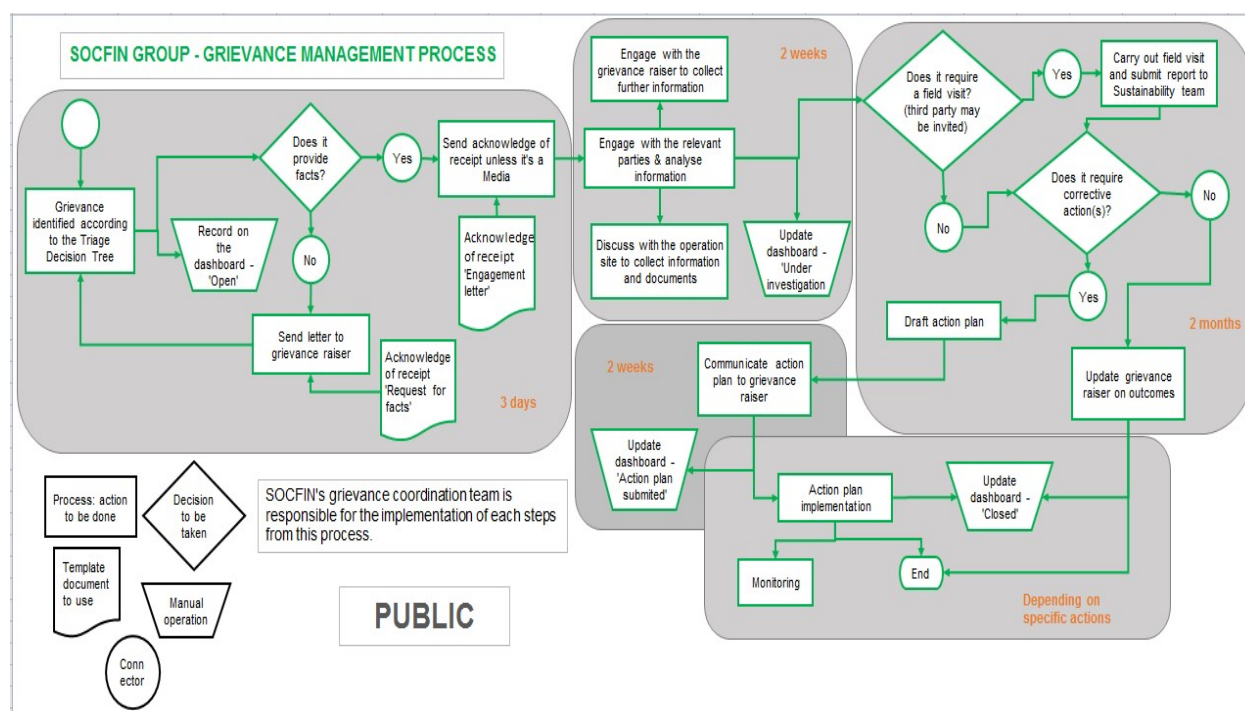
All information required to effectively process and investigate the grievance will also be entered in the database (see OOPC/Form 1.55).

During investigation and resolution processes:

- Communicate by arranging a meeting with the complainant and all affected stakeholders. Discuss the investigation process and solutions and get complainants consent to the intervention.
- Set priorities by indicating if complaint is Minor, Medium or Major as defined.
- Verify findings by reviewing and updating the action plan/corrective and preventive action. Each case is expected to be addressed within 15 working days, beginning from the date of receipt. Depending on the procedural complexity of the case, the time frame for each stage could be adjusted by the head of the investigation team and a new time frame communicated to the stakeholder and MD. Also review all relevant supporting documents, determine the underlying cause, engage all impacted stakeholders and coordinate with the respective department and/or a specialist responsible for addressing the complaints properly.
- Monitor by continuously reviewing internal reports, and recommendations-recommendations may be an operational action plan, corrective actions, and improvements to existing policies and/or continuous engagements with stakeholders.
- Resolution options can require a one-off action or warrant ongoing procedures depending on the nature of the complaint or concern. The complainant may not always be satisfied with the resolution on offer, which is why in some instances, several resolutions are advisable.
- Open communication with the complainant during the grievance process is important to present information transparently and in an appropriate format. Once presented with a set of responses, the complainant must decide whether to accept or reject the resolution. If the resolution is accepted then it must be recorded in the database with the grievance signed off as resolved. The complainant will also receive a written record of the resolution to ensure that all parties are in agreement.
- Close case if complainant and affected stakeholders are satisfied with the action taken.
- If the response is rejected, then additional responses will either be required or the grievance escalated to more senior management (MD). Alternatively, the complainant has the right to escalate the complaint to a third party outside the company, for assistance and finding a resolution.
- OOPC will make every effort, to the extent appropriate, to resolve grievances amicably. If grievances are not resolved, OOPC will seek the expertise of a neutral third party outside OOPC for assistance in finding a resolution in line with the third party's grievance management mechanism or framework.
- All proposed actions to be taken must be presented to the MD for approval before implementation.
- Major grievances will be handled according to the below chart in conjunction with the Socfin Grievance Coordination Team

9. RECORDS

a) OOPC/Form 1.54
b) OOPC/Form 1.53
c) OOPC/Form 1.55
d) OOPC/Form 1.47
e) OOPC/Form 1.47 (Annex 1)
f) OOPC/Form 1.47 (Annex 2)
g) Grievance letter
h) Statements/evidence (if available)
i) Form GF15 (minutes)

10. REFERENCE

a) RSPO Criteria 1.1, 1.2, 3.4, 4.2, 4.5, 4.6, 5.1.9, 6.5.4, 7.11.3, 7.12.2 and 7.12.4
b) ISO 9001:2015, 14001:2015, 45001:2015 Clause 7.4
c) Socfin Group Grievance Management Process
d) EBRD(2012) Grievance Management Guidance Note
e) CAO (2008) The Office of the Compliance Advisor Ombudsman: A Guide to Designing and Implementing Grievance Mechanisms For Development Projects.
f) IFC (2007) Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.
g) IFC (2012) Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts

h) IFC (2009) Good Practice Note: Addressing Grievances from Project-Affected Communities: Guidance for Projects and Companies on Designing Grievance Mechanisms.
i) FSC Criteria 4.3, 4.4, 4.5.

11. REVISION STATUS

Rev.	Date	Details
0	17/09/15	Initial Release
1	24/05/17	Changed ISO 14001:2004 Clause 4.4.3 to ISO 14001:2015 Clause 7.4 Changed logo in header Added a verifier in front page Changed HRC to HRM in Section 5 – Responsibility Change HRM mail address and company's website in § 8.4
2	22/04/18	Changed sentences in Section 8
3	19/06/20	Added ISO & RSPO in §3- Abbreviations Changed "Poor to Indigent" in §7.6 Changed RSPO & ISO clauses in §10- Reference. Changed Lagos State office in §8.4- Receipt of Grievance
4	22/03/21	Added EF in Section 3- Abbreviations Changed 'Project to Estate' in Section 5 Added 'and social' in §7.1 Replaced OOPC/Form 1.54 with OOPC/Form 1.52 in whole document Removed 8.3.3 and 8.3.4 in §8.4.1