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1. OBJECTIVE

The purpose of this policy is to establish internal and external communication procedures associated with ISO, RSPO, IFC requirements 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
CLO	Company Liaison Officer
IFC	International Finance Corporation
ISO	International Organization for Standardization
SCCS	Supply Chain Certification Standard

4. DEFINITIONS

4.1. Internal communication

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

4.2. External communication:


Is communication made by OOPC with organizations/agencies, visitors, 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).

4.4. Communication:

The exchange of information between OOPC and its Stakeholders.

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4.5. **Participation:**

Seeking views before making a decision

4.6. **Non conformity:**

Non-fulfilment of a requirement. Non conformity is addressed through forms GF01, GF04 and GF07, depending on the type of non-conformity experienced.

4.7. **Procedure:**

Specified way to carry out an activity or a process

4.8. **Record:**

Document stating results of evidence of activities performed

4.9. **Commercial Trademark Use:**

Trademark use by members that supply products containing RSPO certified sustainable oil palm products.

4.10. **Consumer-Facing Communication**

Communication targeting the consumer, for example packaging, catalogues, flyers, websites.

4.11. **Product-Specific Claims**

A public statement that an individual product contains certified sustainable oil palm products. This is an on-product claim, such as a website, product packaging, product specification, shipping document etc.

4.12. **On Pack Claims**

A claim which appears on packaging.

4.13. **RSPO Certified Oil Palm Products**

Any product that contains oil palm products properly sourced through the RSPO 'Identity Preserved' (IP), 'Segregated' (SG) or 'Mass Balance' (MB) supply chain models.

4.14. **RSPO Label**


RSPO Trademark as defined herein, for use in on-product communications. A label can also include a 'tag'. The tag is optional for IP/SG ('Certified') and mandatory for MB ('50% Mixed'), RSPO Credits and/or a 'story telling statement'.

4.15. **Trademark Licensing Body**

An organization that has been authorized by the RSPO to issue licenses for the use of the RSPO Trademark.

4.16. **Halal**

Food product that is permissible according to Islamic law.

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5. RESPONSIBILITY

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

HODs or its designate will maintain internal communication within the department.

All communications shall be carried out in an appropriate efficient manner and reasonable time.

CO or his designated 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".


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.

6. PROCEDURE

6.1. Internal Communication

This pertains to communicating ISO, RSPO, IFC, SCCS, Halal Assurance directives/requirements and any other issues in the organization, such as policies and OOPC IMS objective programs, procedures, work instruction, Job description, price of products, contribution to the effectiveness of the IMS, including the benefits of improved performance, implications of not conforming with the IMS, the significant environmental aspects and related actual or potential environmental impacts associated with work, incidents and outcomes of investigations that are relevant, hazards, OH&S risks and actions determined that are relevant, information relating to products and services, enquiries, contracts or orders, including changes, customer feedback/complaints relating to products and services, handling or controlling customer property, contingency actions, relevant environmental performance information and other information to the staff, visitors, suppliers, contractors, customers and smallholders 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, website, SMS, newsletter and board meeting, Nonconforming service/corrective/preventive action report GF07, Nonconforming product/corrective/preventive action report GF01, Nonconforming Safety/Environment GF04, as the case may be. Communication with contractors is facilitated using the HSE

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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, RSPO, IFC, Halal Assurance directives/requirements, processes, products and services to be provided, approval of products and services, methods, processes and equipment, release of products and services, competence, including any required qualification of persons; external providers' interactions with the organization; control and monitoring of the external providers' performance to be applied by the organization. OOPC also externally communicates verification or validation activities that the organization, or its customer, intends to perform at the external providers' premises, changes to requirements of products and services, emergency & contingency plans, relevant environmental performance information, results of legal compliance 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 11 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.

6.3. Communication, Participation and Consultation

This is achieved through Customer satisfaction questionnaire GF02, including potential hazards/accident investigation reports and Toolbox 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

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toolbox talks (documented in OOPC/Form 1.46) and departmental meetings. The workers are also involved in Hazard Identification and Incident investigation.

7. PUBLICLY AVAILABLE DOCUMENTS

In line with RSPO P&C 2018 requirements (especially Indicator 1.1.1), the following list of documents are made publicly available:

- Results of FPIC processes;
- SEIAs ;
- Human Rights policies including policy on protection of human rights defenders (HRDs)/Whistleblowers;
- Social programmes avoiding or mitigating negative social impact;
- Social programmes advancing livelihoods;
- Figures of gender distribution within all workers categorized by management, administrative staff and workers (both permanent casual workers, piece rate workers),
- Partnership programmes for Independent Smallholders, education and health in the communities (where applicable)

and upon request to the following contact address: hsesec@okomunigeria.com or okomuinfo@okomunigeria.com

- Land titles/user rights
- Occupational health and safety plans
- Plans and impact assessments relating to environmental and social impacts
- HCV & HCS documentation
- Pollution prevention and reduction plans
- Details of complaints and grievances
- Negotiation procedures
- Continuous improvement plans
- Public summary of certification assessment report
- Human Rights Policy

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. Responses to request will be provided within 14 working days of receipt.

8. RSPO MARKET CLAIMS AND COMMUNICATIONS


OOPC will not use the RSPO corporate logo for any of its communication as is for the sole use of the RSPO Secretariat.

OOPC will ensure that all its communication is consistent, clear, and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in any of its products.

8.1. General Corporate Communications

OOPC shall use its approved/license RSPO trademark logo in corporate communication as an 'off-product' claim to highlight its membership of the RSPO and/or its commitment to the principles of the RSPO. This shall include but not limited to:

- display of RSPO membership status
- display of RSPO web address (www.rspo.org)
- statements supporting the work of the RSPO
- statements of OOPC's history with regard to the RSPO
- use the RSPO Trademark to promote its membership of the RSPO.

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Where OOPC displays the RSPO Trademark in digital format, it shall be accompanied by the text 'Check our progress at www.rspo.org' with the link leading to its profile page. OOPC will not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified oil palm products.

8.2. Business to Business Communications

OOPC will carry out business to business communication to and/or communicate with other organizations in the supply chain about the use of certified sustainable oil palm products.

OOPC will adhere to the requirements of the RSPO SCCS when confirming the sale of certified oil palm products. This includes stating its supply chain model and certificate number under which any claim is being made.

8.2.1 DISTRIBUTORS/WHOLESALE


Where a distributor or wholesaler takes title of OOPC certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:

- If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to OOPC using the SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, customers will be informed that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.
- If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined above.
OOPC will provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product will not be labeled as certified or sold in such a way that implies RSPO certification.
This information will be provided without constituting a product specific claim.

8.3. Business to Consumer Communications

OOPC is certified on supply chain certification and are such, allowed to make business to consumer communication/claims about its certified sustainable oil palm products contained within its product(s), which are known as 'product-specific' claims or on pack claims as follows:

- OOPC will ensure that when on-pack claims on its RSPO-certified sustainable oil palm products are used, the approved RSPO Trademark and associated identification number must be present.
- Business to consumer communication shall not include information about the claimant's RSPO membership status.
- OOPC shall not communicate to consumers information about their suppliers' RSPO membership status.
- Ensure the use of its RSPO Trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorized for use in relation to any other ingredient.
- OOPC confirms that the use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorized product-specific claim.

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8.3.1 Module B - Mass Balance Specific Rules

OOPC is certified in the Mass Balance model and shall adhere strictly to the conditions as specified under the mass balance specific rules in 2016 RSPO Rules on Market Communications and Claims, revised in January 2019.

8.4. Labeling and Trademark for on Pack Claims


As contained in the RSPO Rules on Market Communications and Claims members of RSPO are allowed to use the RSPO label as applicable to the certified model (for OOPC MB) in one of the following ways:

- Surrounded by the text: 'Certified Sustainable Palm Oil'.
- The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.
- The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.
- Wherever the RSPO Trademark is displayed, OOPC trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri; font size must be at least 4 pt (1.4 mm or 0.06 inch).
- In on-pack communications, the RSPO Trademark will be printed anywhere on the pack.
- OOPC shall also make claims through the posting of its certified (MB) approved RSPO logo communicated on the following:
 - Website
 - Annual reports
 - Signs
 - Internal Journals and publication
 - On product packs
 - Sales documents
 - Calendar
 - Newsletters etc.

9. TRANSPARENCY

OOPC shall be transparent in all of its communications as well as:

- Any sustainability claims made in relation to sustainable oil palm products, regardless of whether its referenced in the claim, to be accurate and verifiable.
- Not make false or misleading claims.
- fulfill the requirements set out in 2016 RSPO Rules on Market Communications and Claims, revised in January 2019 to ensure that any claims made keep with the aims and principles of RSPO.
- be appropriate, so that information meets the needs of relevant interested parties, enabling them to participate;
- be truthful and not misleading to those who rely on the information reported;
- be factual, accurate and able to be trusted;
- not exclude relevant information;
- be understandable to interested parties.

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10. PROCESS INPUTS

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

11. PROCESS OUTPUT


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

12. RECORDS

- Minutes of meetings
- HSE Committee Minutes of meetings
- Internal Newsletter
- Copy of memos to notice boards
- Customer satisfaction questionnaire
- Management review
- GF 01, 02, 04, and 07
- HSE Regulation Forms
- Tool box meeting (safety meeting)
- Socfin Press Review (excel sheet)
- The Okomu Parrot
- OOPC/Form 1.72
- Annual Reports and Accounts

13. REFERENCES


- ISO 9001:2015 Clause 5, 6.2.1, 7.3, 7.4, 8.2.1, 8.2.4 and 8.4.3
- ISO 14001:2015 Clause 5.2, 5.3, 6.1.2, 6.2.1, 7.3, 7.4, 8.1, 9.1.1
- ISO 45001:2018 Clause 5.2, 5.3, 6.2.1, 7.3, 7.4
- IMS manual
- Socfin Group Standard Operating Procedure: Press Review
- RSPO Criteria 1.1
- IFC (2012) Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts; GN 90-113.
- Code of Corporate Governance (Part H)

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- i) 2016 RSPO Rules on Market Communications and Claims, revised in January 2019

14. REVISION STATUS

Rev.	Date	Details
0	23/10/13	Initial release
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 Oyeboode” 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>
7	05/05/20	<p>Changed Company Secretary name on cover page</p> <p>Added “requirements” and removed 9001,14001, OHSAS in §1- Objective</p> <p>Added SCCS and removed OHSAS in §3- Abbreviations</p> <p>Added §4.7- 4.13 to §4- Definitions</p>

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		<p>Changed safety talk to tool box talk form in §6.3- Communication, Participation and Consultation</p> <p>Addition in §6.2- External communication</p> <p>Replaced §7- Publicly Available documents</p> <p>Added §8- RSPO Market claim and communication</p> <p>Added §9- Transparency</p> <p>Removed OHSAS 18001:2007 Clause 4.4.3 and added ISO 9001:2015 Clause 5, 6.2.1, 7.3, 7.4, 8.2.1, 8.2.4 and 8.4.3, ISO 14001:2015 Clause 5.2, 5.3, 6.1.2, 6.2.1, 7.3, 7.4, 8.1, 9.1.1, ISO 45001:2018 Clause 5.2, 5.3, 6.2.1, 7.3, 7.4, 2016 RSPO Rules on Market Communications and Claims, revised in January 2019 in §13- Reference</p> <p>Changed RSPO criteria 6.2 to RSPO Criteria 1.1</p>
8	01/10/20	<p>Addition in §7- Publicly Available Documents</p> <p>Added §8.4- Labeling and Trademark for on Pack Claims</p>
9	12/04/21	<p>Changed Company Secretary name on cover page</p> <p>Introduction of 4.14 to Section 4</p> <p>Addition of Halal Assurance to Section 6.1 and 6.2</p>
10	08/07/22	<p>Changed Paul C. Obi to Ebuka Omerole. Changed the definition of Participation under §4.5. Changed the definition of non conformity under §4.6. Remove the second paragraph under §4.16. removed pointing 7 on second paragraph of §5</p>