

- 1.0 **Policy Statement**
Okomu Oil Palm Company (OOPC) is committed to eradicating all forms of forced labor in our company's workforce and is committed to ethical and fair employment of migrant workers.
- 2.0 **Objective**
OOPC aims to fulfill its obligations under this policy by establishing a comprehensive set of standards that we require our company/contractors to adhere to in order to offer the greatest protection to this class of workers.
- 3.0 **Scope**
The policy applies to employees, contractors, third party contractors (including temporary contractors) and daily workers of OOPC.
- 4.0 **Definitions**
- 4.1 **Forced Labor:** Forced labor is any work or services which people are forced to do against their will under the threat of some form of punishment.
- 4.2 **Migrant workers:** Workers who migrate from their country of origin or permanent residence to obtain employment in the country.
- 5.0 **Guidelines**
OOPC has devised the following measures to protect the rights of migrants and promote equality in the work place.
- Post arrival orientation will be conducted for migrant workers upon arrival on site; to focus especially on language using interpreter where necessary, health, safety, environment, labour laws, and cultural practices as regards High Conservation Value (HCV).
 - OOPC will safeguard the fundamental human rights of the Migrant workers to make an honest/decent living through diligence and hard work. Migrant workers shall not be subject to any discrimination in any aspect of our employment relationship.
 - The confiscation or withholding of worker's original personal identity documents including passports, visas, or immigration clearances is strictly prohibited. Identification documents can only be kept by the employer/contractor where consent has been obtained from the worker.
 - Contracts are signed, by the migrant worker and the contractor, at the beginning of the recruitment process, without recruitment fees. Contractors will ensure workers are allowed to independently review the contract and, where workers are illiterate, the contract should be read out loud in full to the worker in their own language before asking them to sign. The use of supplementary agreements or the practice of substituting the original contract of employment or any of its provisions with those that are less favorable to migrant workers are strictly prohibited and any contractor found to be engaging in such will face losing their contract with OOPC.
 - Migrant workers shall not be subject to any form of forced, trafficked, compulsory, bonded or indentured labour, physical or sexual violence, harassment and intimidation. All work must be entered voluntarily and freely, and workers will be free to terminate their employment at any time, without penalty. Migrant workers family members shall not be threatened with denunciation to authorities to coerce them into taking up employment or preventing them from voluntarily terminating their employment, at any time, without penalty.
 - Migrant workers shall not be held in debt bondage or forced to work in order to pay off a debt. Any advances or loans should be documented. Terms and conditions of repayment would be fair and transparent.
 - OOPC or the contractor shall not restrict migrant worker's access to basic facilities and accommodation. Migrant worker's freedom of movement inside the workplace shall not be restricted except for legitimate concerns for worker safety.
 - Withholding of a migrant worker's wage is prohibited, except permitted by the worker.
 - OOPC shall not subject migrant workers to involuntary overtime.
 - Migrant workers will not pay what local workers are not required to pay.
 - OOPC shall comply with the Nigerian Immigration Service "Migrant E-Registration Guidelines" as derived from Immigration Act (2015) and Immigration Regulation (2017), OOPC shall comply with the Nigerian Labour Migration Policy (2010) which seeks protection of migrant workers and ensures promotion of their welfare. OOPC also subscribes to the minimum standards of the International Labour Organization (ILO) Forced Labour Convention, 1930 (No 29), the International Labour Organization (ILO) Abolition of Forced Labour Convention, 1957 (No. 105) and the United Nations Global Compact, Principle 4 (Forced and Compulsory Labour), 2009 which ensure that no person shall be forced to work under duress, or threat and for which said person has not offered them voluntarily.
 - Contractors involved in the recruitment of migrant workers will be contractually bound to comply with this policy.
 - The Grievance Management Procedure (GP27) should be followed if any migrant worker feels that any of the provision of this policy is perceived to have been violated.
 - The Human Resource Department/ Department Head shall manage, monitor and oversee this policy.

6.0 **Record of Approval**

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	21 MAY 2021

