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1.0 Policy Statement

Okomu Oil Palm Company (OOPC), as a subsidiary of the SOCFIN Group, is committed to implementing responsible and sustainable practices in all aspects of our operations. This Responsible Management Policy outlines our dedication to No Deforestation, No Peat, and No Exploitation, ensuring that our activities align with the highest environmental and social standards as outlined in SOCFIN's Responsible Management Policy.

We recognize the imperatives of economic development, food security, poverty reduction, respect for human rights, and environmental preservation in our host communities. The aim of this policy is to develop and promote responsible tropical agriculture by creating shared value for all stakeholders while ensuring the long-term economic viability of our operations.

This policy reflects our role as a key player in rubber and palm oil production in Nigeria and aligns with the United Nations Guiding Principles on Business and Human Rights, the Roundtable on Sustainable Palm Oil Principles and Criteria, and the Global Platform on Sustainable Natural Rubber Policy Framework.

In addition to aligning with SOCFIN's Responsible Management Policy, this policy also incorporates key tenets of the European Union Deforestation Regulation (EUDR). We recognize the importance of complying with international regulations to ensure our products meet the highest standards of sustainability and legal compliance.

2.0 Scope

This policy applies to:

- All OOPC operations, including our palm oil plantations, rubber plantations, and associated supply chains.
- All employees, contractors, and suppliers involved in our business activities.
- Smallholder suppliers who deliver oil palm Fresh Fruit Bunches (FFB) or wet Natural Rubber (NR) to our factories.

3.0 Definitions


OOPC	Okomu Oil Palm Company
HCV	High Conservative Value
HCS	High Carbon Stock
FPIC	Free, Prior, and Informed Consent
EUDR	European Union Deforestation Regulation
FFB	Fresh Fruit Bunches
NR	Natural Rubber
MD	Managing Director
HOD	Head of Department

4.0 Responsibility

The Managing Director (MD) provides strategic oversight and ensures policy alignment with company objectives.

The HSE Manager is responsible for overseeing the implementation, monitoring, and reporting of the Environmental and Social Framework outlined in this policy.

Heads of Departments (HODs) are accountable for integrating the policy's principles into

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their departmental operations.

5.0 Commitment to Local and Rural Development

OOPC aims to contribute to rural economic development through:

- Promotion of best management practices for sustainable production.
- Inclusion and fair treatment of smallholders in our supply chains.
- Provision of training to improve yield, sustainability performance, and quality.
- Development of necessary facilities and infrastructures such as road networks to support rural communities inline with our CSR policy

6.0 Commitment to Employees & Communities

6.1 Employees

OOPC shall:

- Apply a zero-tolerance approach to human rights abuses.
- Promote gender equity and equality.
- Recognize and respect the rights of all workers, including subcontractors, temporary workers, and migrant workers.
- Implement a transparent grievance mechanism process.
- Ensure fair wages, safe working conditions, and respect for workers' rights.
- Prohibit child labor, forced labor, and discrimination in all forms

6.2 Communities

OOPC is dedicated to:


- Respect the right of indigenous populations and local communities to Free, Prior, and Informed Consent (FPIC).
- Maintain open and culturally appropriate channels of engagement with communities.
- Implement community projects supporting and enhancing living conditions.
- Respect land access rights and tenure of local and indigenous communities.
- Uphold traditional rights of access for subsistence and cultural purposes, in line with legal requirements and our commitment to protect endangered species.
- Implement a transparent grievance mechanism process.

7.0 Commitment to Environmental Preservation and EUDR Compliance

7.1 Minimizing Environmental Impacts

OOPC shall:

- Minimize carbon emissions and take action on climate change.
- Increase the use of green energy while reducing reliance on fossil fuels.
- Prevent pollution of water and air.
- Implement practices that maintain soil health and reduce the use of harmful chemicals.
- Prohibit the use of fire, except in necessary, well-documented cases.

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- Ensure wastewater is treated properly and water is used efficiently.

7.2 Biodiversity and Forest Preservation

We are committed to:

- Protecting natural forests using the High Carbon Stock (HCS) Approach.
- Identifying and maintaining High Conservation Value (HCV) areas.
- Safeguarding wildlife and endangered species.
- Protecting and restoring peatlands.
- Supporting long-term conservation efforts for all ecosystems.

7.3 EUDR Compliance

In line with the European Union Deforestation Regulation (EUDR), OOPC will:

- Ensure our products are not produced on deforested land post-December 31, 2020.
- Comply with all relevant laws regarding land use, environmental protection, and human rights.
- Implement robust traceability systems to track the origins of our products.
- Conduct thorough due diligence to ensure compliance with EUDR.
- Regularly assess and mitigate any risks of non-compliance with EUDR.
- Collect and maintain geolocation data for all production plots.
- Provide transparency to EU customers on compliance with EUDR requirements.

8.0 Transparency and Reporting

OOPC commits to :


- complying with all local and international laws, including the EUDR.
- regular and transparent reporting on our progress in implementing this Responsible Management Policy through our Sustainability Report.
- We will engage with stakeholders, including local communities, NGOs, and government bodies, to share our progress and receive feedback.

9.0 Continuous Improvement

OOPC is committed to continuous improvement in our environmental and social practices. We will regularly review and update this policy to reflect evolving best practices and stakeholder expectations.

This policy is to be read in conjunction with the following OOPC policies:

- Human Rights Policy
- Gender Policy
- Grievance Management Policy
- HCV-HCS Management Plan
- Zero Burning Policy
- Freedom of Association Policy
- Environmental Policy
- Corporate Social Responsibility (CSR) Policy
- Equal Opportunity and Non-Discrimination Policy

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- Whistleblowing Policy
- Greenhouse Gas (GHG) Emission Reduction Policy

10.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Graham Hefer	Managing Director	

MANAGING DIRECTOR
 DR. G. HEFER
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 15 JAN 2025