# SUSTAINABILITY REPORT 2024





### COMMITMENTS

















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This new edition of the Okomu Oil Palm Company PLC's Sustainability Report gives an overview of the company's activities for 2024 in the area of sustainable development and responsible management.

Okomu, a member of the Socfin Group, subscribes to its commitments, policies, charters, and codes, which are detailed in the Socfin Group's 2024 Sustainability Report and on its corporate website and transparency dashboard.

This edition only focuses on activities conducted throughout 2024 in Okomu, Nigeria, particularly on activities that are specific to the local context.

All reports relating to Okomu and the Socfin Group are available on www.okomunigeria.com and www.socfin.com.



### MESSAGE FROM THE MANAGING DIRECTOR



At Okomu Oil Palm Company PLC, we are dedicated to fostering responsible agriculture that enhances rural livelihoods and supports sustainable economic growth. We recognize the vital role we play in local socio-economic development and remain committed to integrating responsible management practices into every aspect of our operations.

Since our inception in Nigeria, sustainability has been at the heart of our mission. We believe that adopting sustainable agricultural practices is essential for a better future, and we take pride in leading the transition toward a more responsible and sustainable private sector.

Despite the economic and financial challenges Nigeria faced in 2024, Okomu Oil Palm Company PLC achieved record-breaking success, with a net result of approximately N 40 billion, making it our best result since our inception 48 years ago. Our commitment to excellence also resulted in the highest-ever production levels, with 74 370 T of Crude Palm Oil (CPO) and 9 097 T of rubber.

Our commitment to sustainability and environmental responsibility remains unwavering. We have successfully renewed our ISO 9001, ISO 14001, and ISO 45001 certifications, and Extension 2 has obtained its RSPO and ISO 9001 certifications for the first time. Our Halal certification for palm oil products is still in good standing, and we look forward to our recertification audit in 2025.

Our Corporate Social Responsibility (CSR) efforts expanded with 56 bursaries awarded to community students and we also continued our infrastructure projects in our neighbouring communities. We also signed a Memorandum of Understanding (MoU) with The Foundation for Partnership Initiative in the Niger Delta (PIND) to enhance our contributions to community development. Additionally, we are continuing our efforts on the fight against deforestation and illegal forest activities with a strategic partnership with the Okomu National Park and Africa Nature Investors (ANI).

Looking ahead to 2025, we are proactively implementing the European Union Deforestation Regulation (EUDR) for rubber smallholders, ensuring sustainable market access. Our commitment to governance, transparency, and sustainability remains unwavering, and we thank you—our stakeholders—for your continued trust and support.

Together, we can build a stronger, more sustainable future for oil palm and rubber.

Dr. Graham Hefer
Managing Director





Vision statement

To be Nigeria's foremost agro-business, driving innovation in sustainable cultivation practices while contributing to the growth of all its stakeholders.

To maximize the use of the resources at our disposal to achieve optimum performance and returns to our stakeholders whilst positively and sustainably impacting the environment and local communities.

Honesty Transparency Service Resilience

Tore values

Recognition (respect and reward)



### 1. THE COMPANY



Our foundation stems from the Federal Government of Nigeria's initiative in 1976 as a pilot project aimed at rehabilitating palm oil and rubber production in Nigeria, covering an initial surveyed area of 15 580 ha of land in Edo State.

In 1990, Socfin became the management agent and majority shareholder of this strategic project, and this has significantly improved our plantations.

Today, we have grown into 3 plantations totaling a concession of 33 113 ha with 4 industrail units. This has made us a major economic player in Edo State and the second highest employer, other than the State government, and a major producer of CPO and rubber in Nigeria.

The Nigerian government has outlined a comprehensive long-term development plan for the oil palm and agricultural sector aimed at unlocking the country's potential in all sectors of the economy for sustainable, holistic, and inclusive national development. The plan focuses on promoting agricultural growth, improving food security, and enhancing the competitiveness of the oil palm and rubber sectors.

Specifically, the government has identified oil palm as a priority crop with plans to increase production and productivity through improved farming practices, research and development, and investment in infrastructure. The Central Bank of Nigeria has also provided support to the sectors through loan facilities with competitive interest rates.

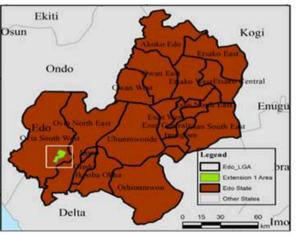
Additionally, the State Government has launched initiatives such as the Edo State Oil Palm Programme (ESOPP) to promote sustainable palm oil production and economic sector. These growth the efforts demonstrate the government's commitment to the oil palm, rubber, developing agricultural sectors, which are critical to Nigeria's economic growth, food security, and industrial development.

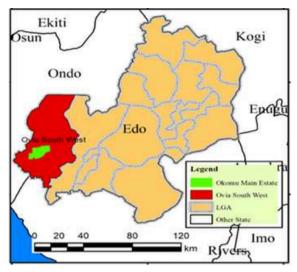


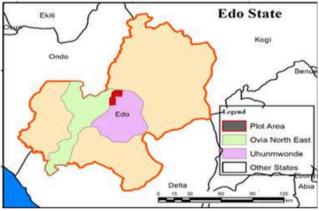


### 1.1 Profile







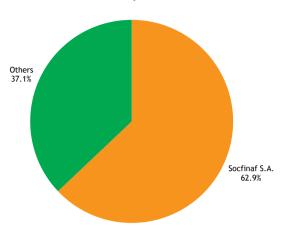


Okomu rubber factory also received cup lumps from smallholders, and 100% of its rubber production is exported.





### 1.2 Ownership structure

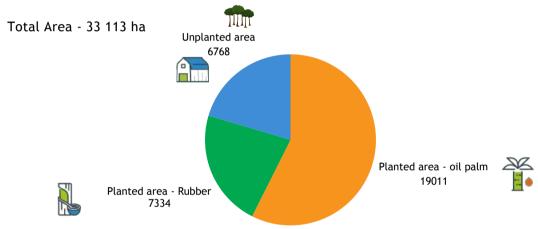


Representation on the Board

Socfinaf S.A	7 persons
Others	3 persons

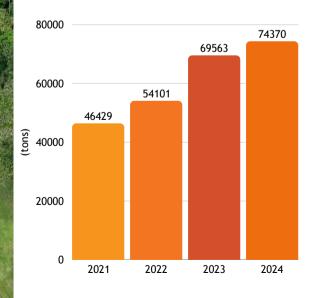
### 1.3 Key figures

### 1.3.1 Areas



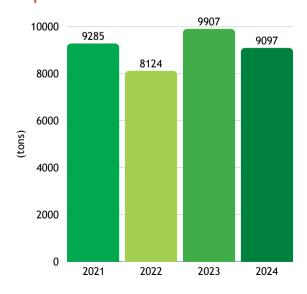
### 1.3.2 CPO production



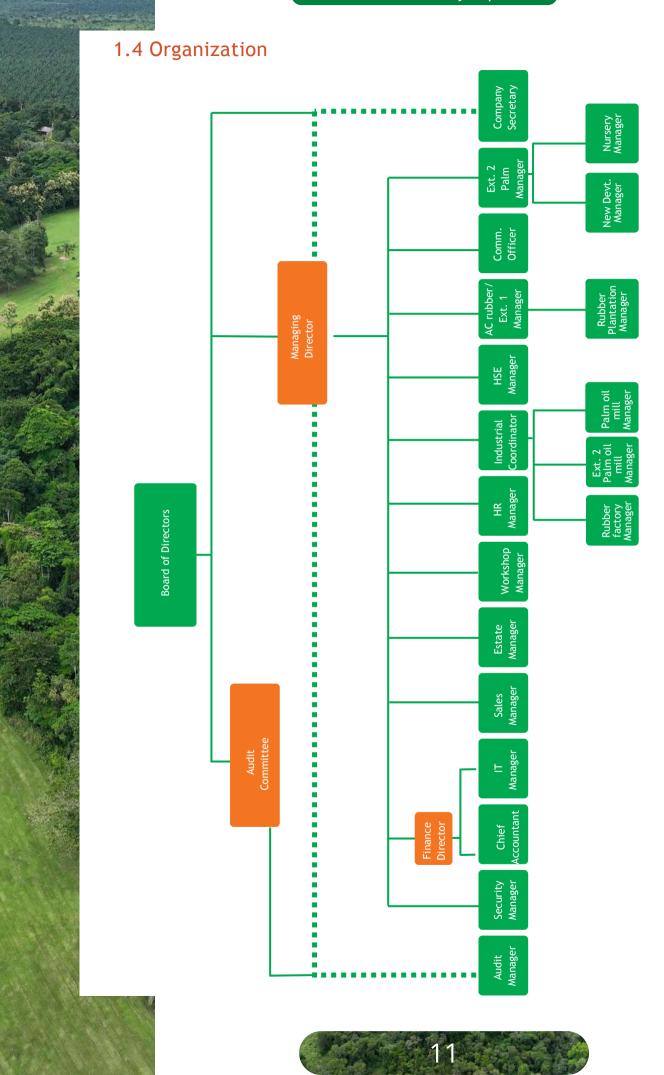


### 1.3.3 Natural rubber production

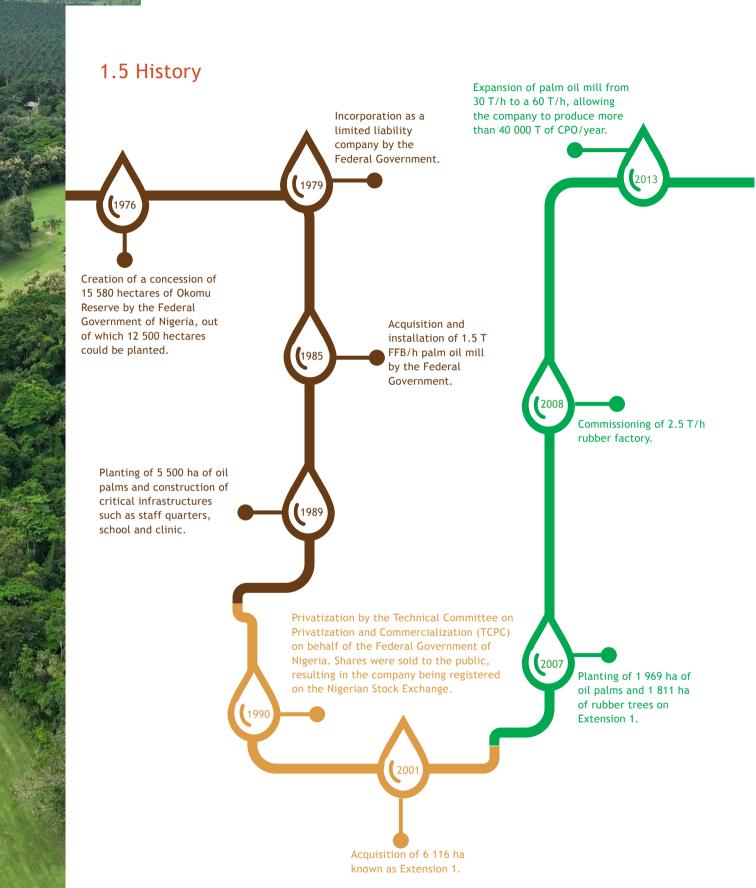




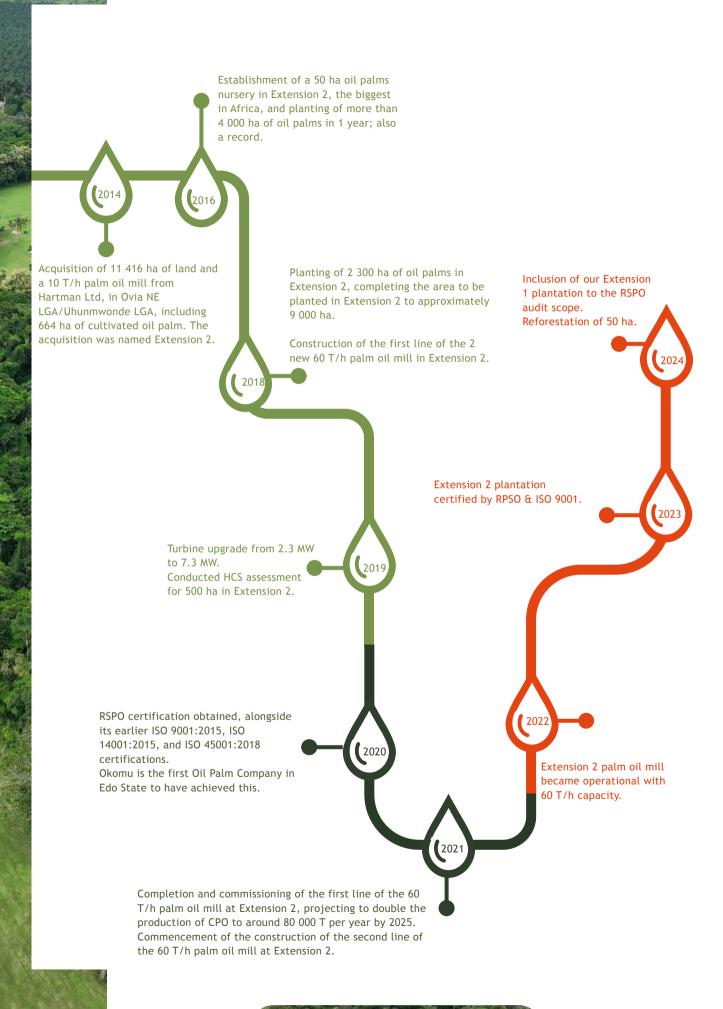














### 1.6 Ambition: to develop a responsible tropical agriculture



At Okomu, we are committed to producing palm oil and natural rubber in a manner that benefits all stakeholders and creates a positive impact in our areas of operation.

This commitment is guided by a robust framework of standards and best practices, including Socfin's Responsible Management Policy and Okomu's Integrated Management System (IMS) Policy. These policies are designed to uphold and protect the rights of communities, enhance their quality of life, and safeguard the environment within and around our plantations.

Our sustainability program is centred on three key impact areas: rural development, local employees and communities, and environment. Through conscious initiatives, we aim to drive long-term socio-economic growth, promote social well-being, improve health conditions, ensure security, and manage ecosystems efficiently. These efforts are made possible with the invaluable support and collaboration of our neighbouring communities.



#### 3 IMPACT AREAS

- Local development
- Our employees and local communities
- Environment







### 1.7 Governance

Okomu operates under the authority of the Socfin Group and its board of directors, adhering to the Group's overarching policies and strategic direction. At the local level, Managers report directly to the Managing Director, who is responsible for overseeing the daily activities on the plantation. The Managing Director ensures that the standards and guidelines set by the Socfin Group are effectively implemented across all operations.

The Managing Director also plays a key role in overseeing Okomu's sustainability efforts. The company's Sustainability Department, led by the Health, Safety, and Environment (HSE) Manager, focuses on integrating sustainable practices into the plantation's operations. This Department is tasked with ensuring that Environmental, Social, and Governance (ESG) principles are upheld in line with both local and international standards.

Okomu places a strong emphasis collaboration and transparency with external stakeholders. The company actively engages various partners, including Governmental Organizations (NGOs), civil society groups, government bodies. community representatives, local authorities. These partnerships are essential for addressing economic, environmental, and social challenges holistically.

Through these collaborative efforts, Okomu aims to foster mutual understanding, drive sustainable development, and create positive impacts in the communities around its concessions. By maintaining open dialogue and working closely with stakeholders, the company ensures that its operations align with the needs and expectations of both the Socfin Group and the local communities.

### 1.8 Responsible governance approach

### 1.8.1 Responsible management policy and code of ethics

At Okomu, all our activities are guided by a robust Responsible Management Policy, which reflects our commitment ethical. to sustainable, and socially responsible This policy serves as operations. foundation for how we conduct business, ensuring that our practices align with both international standards. local and emphasizes transparency, accountability, and respect for the environment, communities, and stakeholders. By adhering to this policy, we aim to create a positive impact in our areas of operation while maintaining the highest levels of integrity and professionalism.

Our employees play a crucial role in upholding these values, and they are required to abide by the company's various policies and Corporate Code of Ethics. This code, which is embedded in the Socfin Group's principles, outlines the ethical standards and behaviours expected of every team member. It covers areas such as workplace conduct, environmental stewardship, community engagement, and compliance with laws and regulations. Through regular training and awareness programs, we ensure that our employees understand and embrace these principles, fostering a culture of responsibility and accountability across the organization.

Together, the Responsible Management Policy and the Employees and Corporate Code of Ethics form the backbone of Okomu's operational framework.



These guidelines not only help us maintain high standards of governance but also strengthen relationships our with stakeholders, including employees, communities, and partners. By inculcating these values into our daily operations, we strive to build a sustainable and ethical business that contributes to the well-being of society and the environment while achieving long-term success.

### 1.8.2 Compliance with legal requirements

### Environmental and social laws

Okomu operates in strict compliance with the legal requirements set bν relevant government agencies, which regularly audit its activities to ensure adherence to national laws and regulations. The Company also aligns its operations with international policies and frameworks. such as those from International Labour Organization (ILO) and the United Nations Sustainable Development Goals (SDGs). This dual commitment to both local and global standards ensures that Okomu's practices in environmental labour, and community protection, engagement are responsible, transparent, and sustainable.

By upholding these high standards, Okomu not only safeguards its operations but also reinforces its reputation as an ethical and trustworthy organization. The company's dedication to legal and regulatory compliance minimizes its environmental downside and its positive social maximizes impact, contributing to sustainable development. This approach strengthens Okomu's position as an industry leader and underscores its mission to create long-term value for all stakeholders while maintaining the highest levels of corporate governance.

#### Labour laws

Okomu is committed to respecting all applicable laws and regulations related to employment conditions within its sector. The company ensures that its internal regulations, which have been collaboratively agreed upon by workers' representatives (unions) and approved by the Federal Ministry of Labour and Employment, are strictly followed. These regulations are publicly displayed departmental noticeboards, ensuring transparency and accessibility for employees. Furthermore, all the workers have a copy of the workers' union constitution, thus creating awareness of workers' rights. It covers a wide range of critical issues, including working conditions, human rights, sexual and workplace harassment, environmental protection, and the prohibition of child labour, among others.

All employees at Okomu are fully informed of their employment conditions and have formally signed their employment contracts, which outline their rights and responsibilities. The company upholds the principle of voluntary employment, allowing employees the freedom to terminate their employment at any time, provided they adhere to the notice period specified in their letters of employment. This approach reflects Okomu's commitment to fairness, respect, and the well-being of its workforce.

To ensure ongoing compliance with national labour laws, regular audits are conducted by the Ministry of Labour and Employment. These audits assess the company's practices and adherence to legal standards. To date, no infractions or violations have been reported during these audits, underscoring Okomu's dedication to maintaining ethical and lawful employment This consistent practices. Company's compliance reinforces the reputation as a responsible employer.



### 1.8.3 Zero tolerance approach

#### Child Labour

At Okomu, we firmly oppose the use of child labour in any form, whether by individuals or institutions. This stance aligns with the International Labour Organization's Convention on Child Labour and the Nigerian Labour Act, which define and prohibit such practices. We are committed to upholding these standards and ensuring that our operations and partnerships reflect this principle.

While Nigerian law sets the minimum employment age at 15, Okomu goes a step further by not hiring employees under the age of 18. This policy is strictly enforced and extends to all contractors working with the company. Contractors are required to comply with this standard, ensuring that none of their workers are below the legal minimum age as defined by applicable labour laws and regulations.



### Forced or compulsory labour

At Okomu, we firmly believe that all humans are free and equal, and we do not tolerate any form of forced or compulsory labour. This prison labour, slavery, includes human trafficking, or any other practice that undermines human dignity and freedom. Our commitment to these principles unwavering, and we ensure that all employees and contractors adhere to these standards as part of our ethical and operational framework.

The company strictly prohibits the retention of travel documents, identification papers, or any form of bond from employees. This policy is in place to safeguard the rights and freedoms of our workforce and to prevent any situation that could lead to coercion or exploitation. By maintaining this standard, we reinforce our dedication to creating a fair and respectful working environment for everyone associated with Okomu.

In the 2024 audit, no instances of non-compliance related to child labour, forced labour, or compulsory labour were identified. However, we remain vigilant and committed to upholding these values. Any violation of these commitments, whether by employees or third parties, will result in severe sanctions. This zero-tolerance approach underscores our responsibility to protect human rights and maintain the highest ethical standards in all aspects of our operations.





#### 1.8.4 Monitoring from stakeholders

#### **Government institutions**

Okomu is subject to regular visits and audits by relevant government agencies that monitor its operations to ensure compliance with legal and regulatory standards. These agencies include the state and federal Ministries of Environment, the Ministry of Labour and Productivity, the Ministry of Agriculture, and the state Ministry of Physical Planning and Urban Development. These audits help to verify that the company's activities align with national and state-level policies, particularly in areas such as environmental protection, labour practices, agricultural standards, and urban development regulations.

In addition to these audits, Okomu maintains transparency by regularly sharing progress on its activities with government agencies. These reports provide detailed updates on the Company's operations. sustainability initiatives. and efforts. Βv fostering compliance open communication and collaboration regulatory bodies, Okomu demonstrates its commitment to accountability, responsible business practices, and adherence to the highest standards of governance.

### Local and international clients

Okomu's industrial units, both the palm oil mills. palm kernel crushing plant and rubber factory, operate with integrated processes that meet the most stringent international standards. From the outset, these facilities have been designed to align with global best practices, ensuring efficiency, quality, and sustainability in all operations.

industrial The units have achieved certification ISO 9001:2015 standard for its quality management system. a critical requirement for collaborating with international companies. Additionally, they certifications for ISO 14001:2015 (environmental management) and 45001:2018 (occupational health and safety). Palm oil productiom is also certified with RSPO 2018 P&C (Roundtable on Sustainable Palm Oil) and Halal, reflecting its commitment to excellence and sustainability.

Okomu's operations are fully aligned with the expectations of international customers regarding responsible management. This includes adherence to principles such as zero deforestation, no child labour and respect for human rights. These commitments are embedded in the company's policies and daily practices.

#### Our certfications



















### National quality standard

Okomu prioritizes the quality and safety of its rubber and palm oil products, as demonstrated by the renewal of its Standard Organization of Nigeria (SON) certification in 2022, which is valid till 2025. This certification underscores the Company's commitment to maintaining high standards for its customers and consumers, ensuring that its laboratory processes comply with SON's rigorous procedures.

In addition, our strong relationship with the Federal Ministry of Environment and the National Environmental Standards and Regulations Enforcement Agency (NESREA) has continually been demonstrated with key reference to their visit to the company's facilities in 2024. These certifications reflect our dedication to delivering reliable and safe products to both local and international markets.

### 1.8.5 Grievance management system

At Okomu, we have put in place a well-defined grievance management system designed for our internal and external stakeholders to resolve any misunderstanding amicably so that it won't result in crisis. We ensure to always inform all our stakeholders about this system at our regular stakeholder engagement meetings, and a copy of this policy is available on www.okomunigeria.com/commitments.

In 2024, we received a total of 16 complaints or grievances concerning labour and social issues, and after following the company's laid down procedure for grievance, they were all discovered to be unfounded and resolved with the complainant.

### 1.8.6 Recognition of our CSR performance

Our commitment to our neighbouring communities is one that has been deliberate and strategic in attracting meaningful development to the area. We invested a lot in our Corporate Social Responsibility (CSR) programme and have once again delivered beyond expectations to our 29 neighbouring communities.

Strategic priorities for community-driven projects are identified annually through proactive engagement with local stakeholders across our operational areas. In 2024, over 20 development initiatives, estimated at over Naira 254 million, were undertaken, covering infrastructure upgrades, road maintenance, poverty alleviation, and cultural support, etc.

Aside from the usual infrastructural projects that the company completed in her its various communities, 56 recipients from these communities received bursaries totalling over Naira 10 million in 2024, and the company increased the value of these bursaries by 36% over that of the prior year.

Some beneficiaries of our 2024 bursary





### 2. LOCAL AND RURAL DEVELOPMENT



#### Context

Beyond agriculture, we are deeply committed to the long-term development of our neighbouring communities. Through training and employment opportunities, skill acquisition programs, and the promotion of best practices, we empower local residents with sustainable livelihoods. Additionally, we actively invest in infrastructure projects to improve education, healthcare, and transportation, ensuring that our operations leave a lasting positive impact on the communities we serve.



### 2.1 Local development plan

Our development plan is designed to foster long-term growth in our local communities by enhancing capacity through training, employment opportunities, and targeted initiatives that address the unique needs of our local communities.

We collaborate closely with local authorities, traditional leaders, and recognised community representatives to identify, design, and implement impactful development projects.

Given the rural nature of our neighbouring communities, our efforts primarily focus on the creation and maintenance of essential public infrastructure, such as schools, hospitals, roads, and boreholes, to ensure lasting benefits for all residents.



## 2.2 Actions for local development2.2.1 Local partners

#### Contractors

As part of our corporate social responsibility, we engage the services of local contractors when specialized expertise is required within our plantations. These partnerships with local contractors foster jobs creation and within encourages entrepreneurship neighbouring communities. By prioritizing local partnerships, we contribute to economic growth and skills development, ensuring that our neighbouring communities benefit directly from our operations.

In 2024, over 100 contractors worked with Okomu across various sectors, including security and agronomic activities. These collaborations provided employment opportunities for approximately 7 500 direct and indirect employees, strengthening the local economy and enhancing livelihoods.

Our commitment to local engagement goes beyond employment. By working with community-based contractors, we not only support jobs creation but also help build technical expertise and business capacity, ensuring long-term sustainability and self-reliance within the communities we serve.

### **Smallholders**

Our smallholders' scheme is one of the success stories we have witnessed in our partnership with our local communities. We engage smallholders within 50 - 100 km radius of our palm oil mills and rubber factory and this has seen wide acceptance.

In 2024, there was a significant increase from the previous year as we bought 20 110 T of FFB, which represents a 193% increase. This substantial growth is attributed to intensified outreach efforts to recruit more smallholders into the scheme and the introduction of income-enhancing activities such as beekeeping, which has improved smallholders' farmer loyalty and engagement.

Currently, 598 smallholders have been registered with us, in a tripartite agreement that also involves the aggregator. There is also an agreement between Okomu and the cooperative society the smallholder belongs to, and the aggregator.

Trainings are regularly organized on recent techniques in planting and plantation management, group dynamics, leadership skills, cooperative assessment, etc. This is being done in collaboration with 2scale and TA Commodities.





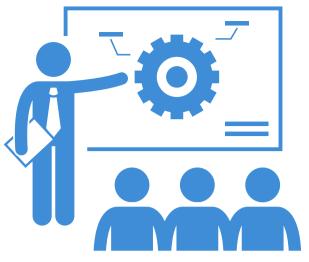
### 2.2.2 Training for competences

Recognizing the impact of trainings and skills development on the productivity of our workforce, we organize each year internal and external trainings' programs to enhance our employee performance and operational efficiency. This is a reflection of our commitment to empowering our workforce with the knowledge and skills needed to excel in their roles while maintaining the highest standards of safety and sustainability.

In 2024, we organized 4 375 training sessions, totalling 1 737 726 hours involving 75 791 employees (some employees attending multiple sessions), covering topics such as work instructions, SOPs and procedures on environment such as waste management, environmental policies, ISO 14001 training, RSPO, HCV protection, spill control and environmental risk assessment with staff evaluated by their superior on completion of each structured training they attended.



About 60 different trainings spanning both technical and behavioral



### 2.2.3 Facilitating local mobility

Daily, we provide transportation for our employees to work sites and weekend trips to urban centres, which are fully funded by the company. This initiative not only eases employee mobility but also grants them affordable access to services in urban areas and the opportunity to visit their families on weekends, enhancing their overall well-being.

Our company's roads are also open to members of neighboring communities outside our concession to access their communities, as the government roads are not everytime in good conditions.

In 2024, we initiated a significant road infrastructure project aimed at improving local road conditions. The project involved grading approximately 202.24 kilometres of road across 30 communities, estimated at about Naira 174 million. This project has improve road accessibility helped residents and businesses, enhance transportation efficiency, reduce travel time and vehicle maintenance costs, boost local economic activities due better to connectivity, and strengthen community relations.



### 2.2.4 Research and

### development

At Okomu, our research initiatives are conducted in collaboration with the Nigeria Institute for Oil Palm Research (NIFOR) with the aim of enhancing productivity, sustainability, and innovation across our operations.

We are currently undertaking a research activity on the use of polyhalite sources of potassium nutrients, which is scheduled to climax in 2025. Other research's works include, but not limited to, evaluation of 2 POLY4-inclusive blend for oil palm production. Best Management Practices (BMP) plots have also been established across all our estates to identify best practices for "yield making" and "yield taking" with data collection ongoing to the plantation's potential as well as training employees on improved practices. Currently, 522 ha in Extension 2 and 555.4 ha in Extension 1 are under BMP management.

For rubber production, Okomu is conducting a Large-Scale Clonal Trial (LSCT), a long-term agronomic experiment aimed at evaluating and comparing selected rubber clones. This research seeks to confirm the characteristics of each clone, allowing for data-driven, site-specific planting recommendations. Supported by Socfin's Agronomy Department, this study is expected to refine rubber cultivation practices, ensuring higher yields and improved resilience against environmental challenges.



Rubber factory laboratory



### 3. EMPLOYEES AND LOCAL COMMUNITIES



### 3.1 Career development

Our employees shape who we are — they are our most valuable asset. We make conscious efforts in increasing their competencies through trainings and manpower development, and reward them in consonance with our core value of "Recognition" (respect and reward).

Employees are encouraged and rewarded through promotion. In 2024, 16 employees received different categories of promotion with 3 of them promoted to the level of Superintendent, thus giving them the opportunity to understudy their bosses in pursuit of our succession plans.

### 3.2 Human rights

At Okomu, we uphold human rights through a comprehensive policy that guides the treatment of employees and ensures no one is dehumanized. This policy also outlines the appropriate conduct for security staff when handling suspects. It includes specific provisions to protect the reproductive rights of female workers, ensuring their dignity and well-being are respected. Any violation of this policy results in strict sanctions, reflecting Okomu's dedication to maintaining a fair, respectful, and inclusive workplace for all.

Also, we have formalized our stance against forced labour in our human rights policy and code of ethics policy, aligning it with the UN guiding principles on business and human rights. It is worthy to note that in 2024, we recorded no human rights violations.

### 3.2.1 Land rights

At Okomu, we operate on leased land under the Land Use Act, which grants the State Government authority over land allocation. As a company, we do not own the land but secured it through official lease agreements with the state, ensuring compliance with legal and regulatory frameworks. This arrangement allowed us to carry out our agricultural activities while adhering to government policies on land use and management.

The Land Use Act vests all land within a state's territory, excluding land owned by the Federal Government or its agencies, under the authority of the State Governor. The Governor holds this land in trust for the people and is responsible for its allocation in urban areas for residential, agricultural, commercial, and other uses. In non-urban areas, similar powers are granted to Local Governments, ensuring structured distribution for various developmental purposes.



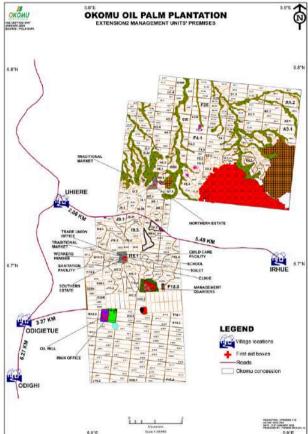
### 3.2.2 Free, Prior and Informed Consent (FPIC)

In alignment with the Socfin Group's policy on responsible management, Okomu Oil Palm Company (OOPC) is committed to upholding the rights of indigenous populations and local communities to freely give or withhold their land via Free, Prior and Informed Consent (FPIC) regarding any operations affecting land where they hold legal, community, customary rights. This commitment ensures that local stakeholders are fully engaged and consulted before any land-use decisions are made.

The Company's most recent concession, Extension 2, was acquired as governmentdereserved land that had previously been owned and cultivated by 2 investors within Owan **Forest** Reserve, located approximately 50 km from Benin City, Edo State. Though not virgin land, we conducted a full FPIC process upon acquisition of the securing agreements from property, neighbouring communities and establishing a engagement continuous framework reaffirm consent. This process was completed in July 2016.

To further institutionalize this practice, Okomu developed a FPIC procedure in 2019 and actively contributed to the formulation and approval of the Edo State Investment Promotion (Free Prior and Informed Consent) Regulation, 2022.





Map of Extension 2



Map of Okomu main Estate & Extension 1



### 3.3 Relations with neighbouring communities



### 3.3.1 Context

The majority of the population in Ovia North-East, Ovia South-West, and Uhunmwonde LGAs consists of indigenous Bini people, making up 75% of the residents. These communities rely primarily on subsistence farming, growing food crops for their families and for sale. Their traditional beliefs are deeply rooted in nature, with spiritual significance attributed to trees, rivers, sacred grounds, and objects, which they believe influence their daily lives.

The predominant agricultural practice is shifting cultivation, using the slash-and-burn method to clear land for farming.

While 54.2% of the population across these LGAs are ethnic Bini, the remaining 45.8% comprises diverse ethnic groups, including Esan, Tiv, Kuteb, Hausa, Urhobo, Ijaw, and Calabar, among others. This diversity fosters peaceful coexistence, with different ethnic groups living and interacting socially, contributing to community development and strengthening cultural integration within the region.

### 3.3.2 Engagement mechanism

In-house community liaison department

Our Corporate Social Responsibility (CSR) and stakeholders' engagement framework has helped to establish and maintain a cordial relationship that is currently enjoyed with our neighbouring communities. This is coordinated by the Managing Director, assisted by the Communication Officer, while the Community Liaison Officers (CLOs) serve as a connection with the

This has resulted in a win-win situation in 2024, giving results such as continued cordial relations and no boundary disputes. Additionally, we signed a Memorandum of Understanding (MoU) with a Non-Governmental Organization (NGO) called Foundation for Partnership Initiatives in the Niger Delta (PIND) who will act on advisory capacity in our relations with the communities.

### External platform of dialogue

As part of our deliberate and intentional efforts towards strengthening our relationship with our neighbouring communities, we engage our neighboring communities 6 times a year, holding 2 meetings at our Main Estate and a visit every quarter to the various communities for a town hall meeting with the community members. These gatherings provide an open forum where all community members are encouraged to participate, fostering dialogue, collaboration, and inclusivity in decision-making.



### 3.3.3 Livelihood

### 3.3.3 (i) Community access to water supply

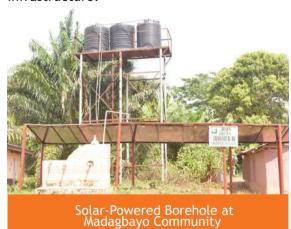




Part of our support for members of our neighbouring communities is the provision of clean, safe, and reliable water sources. Recognizing the essential role of clean water in improving health and livelihoods, in 2024 we took deliberate steps to address this need by rehabilitating 4 boreholes in 4 of our communities and sinking 5 new boreholes in other communities.

In our effort to deepen our commitment to environmental sustainability and shifting to renewable energy source, we constructed a solar-powered borehole in Madagbayo community with a view of replicating this in other communities.

These boreholes provide a sustainable water source, helping to improve sanitation, reduce waterborne diseases, and enhance overall living conditions. Our initiative reflects our dedication to fostering long-term positive impacts and ensuring that the communities we work alongside benefit from essential infrastructure.





Borehole at Ofunama Community



### 3.3.3 (ii) Community healthcare



Okomu Main Estate Clinic

At both our Main Estate and Extension 2 plantations, we ensure that members of our neighbouring communities have access to our mecial facilities at no cost for consultations and medical services. Community members only need to pay for the cost of drugs, making essential healthcare more accessible and affordable. This initiative is part of our broader commitment to improving the well-being of the communities around us.

Additionally, we have taken proactive steps to strengthen healthcare infrastructure and renovating equipping community healthcare centres in Madagbayo, Odighi, Uhiere and Odiguetue. These improvements support local health campaigns and enhance services for our neighbouring communities. By investing in healthcare, we aim to contribute to a healthier population and improve overall living conditions in the areas where we operate.

### 3.3.3 (iii) Access to quality education

Okomu has played a significant role in ensuring that neighbouring students have access to quality education within their own communities, eliminating the need to seek schooling elsewhere. To support this, the company has built and furnished over 15 blocks of three-classroom buildings across 12 neighbouring communities, providing a conducive learning environment for children.

This investment in education reflects Okomu's commitment to fostering long-term community development through improved educational infrastructure.

In addition to building schools, Okomu introduced an annual bursary award scheme in 2010 to support indigent students from its neighbouring communities who are pursuing higher education. As at 2024, over 422 students institutions tertiary have benefited from this initiative, easing the financial burden of education empowering young people to build a better future for themselves and their communities.





2024 Bursary recipients







Past beneficiaries of bursary



### 3.4 Social commitments to employees



### 3.4.1 Employees' social protection

<u>Social contributions (pensions, occupational accident, associations, unions)</u>

At Okomu, we contribute to, and comply with national legislation by participating in various national schemes related to pensions, insurance, and labour unions. We ensure that all employees, contractors, and subcontractors are covered under a structured pension scheme while also making necessary contributions to the Nigeria Social Insurance Trust Fund (NSITF) to provide social security for employees.

Beyond pensions and insurance, we fulfill our obligations through tax payments, National Housing Fund (NHF) contributions by staff members, and contributions to the Industrial Training Fund (ITF). These contributions not only support employees' welfare but also contribute to national development by funding initiatives that enhance workforce skills, housing accessibility, and overall economic growth.

### Social dialogue

Staff representatives, including union and block leaders, play a vital role in facilitating communication between emplovees management. They ensure employees' voices are heard and facilitate the exchange of information. Regular meetings are held between the Company and union representatives, providing a platform to discuss company activities, address concerns, and foster collaboration.

While union membership is not mandatory under Nigerian law, all employees are informed of their right to join and the benefits it offers, such as collective bargaining. Okomu maintains a positive relationship with its employees' union, and there have been no reported incidents threatening the freedom of association or collective bargaining. This reflects the company's commitment upholding to employees' rights and maintaining harmonious workplace.

The employees' union conducted an election in 2024, and new Executives were elected after the expiration of the tenure of the previous executives.



### Internal grievance procedure

At Okomu, our grievance procedure is designed to address and resolve workplace concerns before they escalate into crises. It focuses on identifying, managing, and resolving grievances effectively. This process is clearly documented and communicated to all employees to ensure they understand their rights and responsibilities when raising issues.

Employees can report grievances anonymously or openly, either individually or as a group. They can submit their concerns through union representatives, their Departmental Secretary, or the HSE Secretary. The Human Resources (HR) Department is responsible for collecting and addressing these grievances, ensuring a fair and transparent resolution process. This system underscores commitment to maintaining a supportive and respectful work environment.

In 2024, 18 grievances were raised, and they were all addressed and closed within the stipulated time, with the complainant expressing satisfaction with the process and outcome.

### 3.4.2 Key human resources figures

Total workforce

7 453
employees

(total workforce)
>50
5.6%
18-29
31%

63.4%

Distribution by age





### 3.4.3 Occupational Health and Safety (OHS)



#### OHS policy

At Okomu, we are committed to providing a safe and healthy working environment for our employees and stakeholders. Our policy focuses preventing incidents and on occupational illnesses, with the goal of ensuring everyone returns home safely every incidents by day. We strive for zero continuously improving safety performance through hazard identification, risk assessments, and preventive measures such as training, safety equipment usage, and standard operating procedures. Periodic audits, incident investigations, and reviews of legal requirements are also conducted to ensure risks remain well-managed.

We have implemented a comprehensive workplace health and safety policy aligned with ISO 45001 standards. This includes hazard identification, risk assessment, legal compliance, employee training, emergency response, and incident investigation. Additionally, we foster an open reporting culture, including near miss, encouraging workers to report unsafe conditions without fear of reprisals and ensuring they are protected from retaliation for reporting accidents or hazards.

Okomu has instructed employees to remove themselves from work situations they believe pose imminent and serious danger to their life or health, provided there is verifiable evidence. We comply with all local and national legislation and investigate all incidents to their root cause, implementing corrective and preventive actions to prevent reoccurrence.





At Okomu, we prioritize regular training to ensure employees apply appropriate safety procedures in their tasks. Structured safety and environmental training is conducted throughout the year for selected categories of workers. These include incident investigation & reporting, defensive driving, chemical/spill management, Personal Protective Equipment (PPE) usage, emergency planning, waste management, safe workplace practices, RSPO standards. ISO fire safety. environmental sensitization. This training has significantly improved work activities, heightened awareness of safety guidelines, and fostered positive behavioural changes among our employees.

### **Monitoring**

The Company's Doctor maintains detailed records of work-related accidents involving employees who require medical consultation. These records are shared with the HSE Department and analyzed to identify trends, such as the number of affected employees, types of recurring accidents, and the departments or activities involved. This analysis helps in implementing targeted measures to prevent future incidents.

In 2024, Okomu recorded an accident rate of 0.40, 0, and 3.42 per 200 000 hours of work for employees, temporary workers and contractors, respectively. These figures reflect the company's ongoing efforts to maintain a safe working environment while highlighting areas for further improvement, particularly in contractor safety management.





### 3.4.4 Health policy for employees



### **Health services**

In addition to contribute to the Nigeria Social Insurance Trust Fund (NSITF) for employees, Okomu operates 2 clinics and 3 health outposts within the plantations, providing free basic healthcare to all employees and their registered dependents. We also have 5 ambulances that are available 24/7 for emergencies. All these structures are managed by 2 resident Doctors and 28 Nurses.

Results of employees for 2024 that underwent the test revealed no significant impact to their health.

#### Disease prevention, detection, and treatment

Our resident Doctor conducts health checkups for all new employees upon recruitment and provides regular follow-ups to monitor their well-being. This proactive approach enables early detection of health issues and facilitates timely treatment. The company also prioritizes disease prevention, detection, and treatment, ensuring employees remain healthy and productive.

To promote health awareness among employees and their families, the Medical and HSE Departments regularly organize campaigns on important health topics. These initiatives aim to educate and empower the community, fostering a culture of health and well-being across Okomu's operations.





### 3.4.5 Education policy for employees' children



#### **Education services**

At Okomu, we provide subsidized access to quality primary education for the children of our employees. In collaboration with the Edo State Government, we support the government-run primary school within our plantation by providing infrastructure and accommodation for its teachers and other needs.

During the 2024 school year, 1 396 children attended classes at both the Okomu Staff School and the Okomu government school, which includes crèche, nursery, and primary levels. These schools with a conducive learning environment are staffed with 50 teachers.

#### School transport

At Okomu, schools are situated in a central location on our plantation, ensuring easy access for most children. For families living in more remote areas of the plantation, we provide 3 free school buses for transportation to guarantee that all children have equal access to subsidized education.

Additionally, we offer free transportation for employees' children attending secondary schools in nearby communities, ensuring they can travel to and from school safely and conveniently. This initiative underscores our commitment to supporting education and providing equal opportunities for all children within the Okomu community.



Support for quality education

Okomu supports teachers of government school in our plantation with free accommodation and also provides free basic amenities for them. We also provide them with supplies every year to support teaching in the best conditions possible.



Okomu Staff School Graduation Ceremony



### 3.4.6 Infrastructures for employees



We currently manage 6 villages (Main Estate, Extension one, IITA, Rubber Estate, Extension Two Northern and Southern Estate). The 6 villages have a population of 13 172 inhabitants (7 610 employees and 5 562 dependants).

In 2024, we continued our investment in transport routes, housing/accommodation, social infrastructures, water, and electricity. This initiative underscores our commitment to providing comfortable and adequate housing for our employees.

To enhance communication and ensure a high quality of life within the plantation, each block is managed by a block leader. This role was specifically established to facilitate dialogue between the company, employees, and their families while promoting a peaceful and well-organized living environment.







#### Leisure infrastructures

Beyond providing personal housing, Okomu is actively developing infrastructures to enhance daily life in its villages and promote the social well-being of employees.

Sports fields are available within the villages, offering employees and their family's spaces for recreation and physical activities.

In 2024, we organized the annual MD's cup tournament and marathon races as part of the company's annual end-of-year programmes.

Additionally, Okomu supports the growth of a vibrant social and economic life constructing maintaining gathering and places, clubhouses, and facilitating the establishment of shops. **Employees** organize events such as weddings within the villages and are encouraged to use these communal spaces for social gatherings, fostering a strong sense of community.

The second edition of the Miss Okomu Beauty Pageant was also organized in 2024, providing an avenue for employees to showcase their beauty coupled with brains.













## Photos from the Okomu MDs Football Tournament







Extension 2 Palm Plantation team at the 2024 Okomu MD's Cup finals



Okomu MD's Cup











Main Estate/IITA female team, finalist at the 2024 Okomu MD's cup female category



## 4. Environment



## 4.1 Commitment to protect the environment

As a member of the Socfin Group, Okomu adheres to the principles outlined in Socfin's responsible management policy, emphasizing openness, transparency, and commitment to the protection of the environment. Key commitments include environmental conservation, health, education, and safety, all aimed at minimizing any negative impact on employees, local communities, and biodiversity.

In 2024, the National Environmental Standards and Regulations Enforcement Agency (NESREA) conducted its fourth visit to our company. Following a comprehensive assessment of our plantations, NESREA confirmed compliance with applicable environmental standards and regulations.

Through its operations and commitments, ensures adherence to Nigeria's environmental legislation, reinforcing its dedication to sustainable and responsible business practices. This alignment with national and international standards underscores Okomu's role as a leader in ethical and environmentally conscious operations.



to



# 4.2 Commitment environmental standards

Okomu adopts the High Carbon Stock (HCS) Approach for new developments, as defined by the HCS Approach Steering Group and the HCS Toolkit. This methodology ensures sustainable land use by distinguishing forest areas that should be conserved from those suitable for development. In 2019, a High Carbon Stock assessment was conducted by Proforest, which evaluated the Proposed Development Area (PDA) and provided critical insights for responsible land management.

In addition to the HCS approach, Okomu is committed to identifying, maintaining, and protecting High Conservation Value (HCV) areas.

In 2015, the company conducted HCV assessments across its concessions. At Extension 1 and Extension 2, the assessments identified HCVs 3, 4, 5, and 6, while the Main Estate assessment in 2017 revealed the presence of HCVs 1, 3, 4, and 6. These findings guide Okomu's efforts to preserve biodiversity and ecosystems of significant ecological, social, or cultural importance.

By integrating the HCS and HCV approaches, Okomu demonstrates its dedication to sustainable and environmentally responsible practices. These initiatives align with global conservation standards and reinforce the company's commitment to balancing agricultural development with the protection of critical natural habitats.





#### 4.3 Natural resources management system



HSE Officer tranning community indigenes on Okomu's reforestation program

#### 4.3.1 Water

Water is a vital resource, and its sustainable management is a top priority for Okomu. At Okomu, we are committed to minimizing water wastage, maintaining its purity, and protecting water sources. Procedures have been established across all operations to prevent damage to natural water sources, and safe facilities with containment bunds are constructed in industrial and storage areas. Additionally, watercourses within the plantation are safeguarded by preserving natural vegetation along river corridors.

In order to reduce water wastage, we regularly monitor daily consumption of water in all estates and makes plans to reduce its wastage annually. The monitoring also helps detect leakages, and repairs are made to conserve water. Total water consumption for operational needs at the industrial level (surface water, groundwater) in 2024 is 568 955 m3.

To maintain the quality of surface water, we maintain buffer zones across all water bodies within the plantation with quarterly monitoring of the underground and surface water carried out, during which the quality of water is also assessed to ensure compliance with established standards.

For our effluents, we utilize a pond system (lagooning) based on a biological (anaerobic) process, which allows for ongoing modification and improvement in the quality of the effluent over time. This system reflects our commitment to sustainable effluent treatment and the continuous enhancement of our environmental performance. Also, fertilizer warehouses and latrines are not located anywhere close to the water bodies.





#### 4.3.2 Soil

In Okomu, cover crops are utilized to prevent soil erosion and enhance soil fertility by providing organic matter and nitrogen, thereby reducing the need for chemical fertilizers. This sustainable practice supports long-term soil health and productivity.

Okomu has a robust soil protection policy in place, which includes an effective spill management system. To contain spills of chemicals, petroleum products, palm oil, and other hazardous liquids, the company employs containment walls (concrete), drip trays, and spill kits for absorption

Additionally, roads within the plantation are equipped with drainage gutters to efficiently manage water runoff and prevent soil degradation.

These measures demonstrate Okomu's commitment to environmental stewardship and sustainable land management.





Group picture of Okomu HSE representatives from different departments after the 2024

HSE awareness week

#### 4.3.3 Waste

At Okomu, we have implemented a comprehensive waste management procedure that encompasses a hierarchy of treatment and other techniques to ensure responsible handling of waste. We prioritize waste reduction, reuse, recycling, and environmentally sound disposal practices as part of our waste management strategy.

Solid waste is separated from source and taken to the company's compartmentalized dumpsite. Meanwhile, liquid waste, including palm oil mills' effluents and rubber factories' effluents, is treated in compliance with national legislation standards as per the National Environmental Protection (Effluent Limitation) Regulations. The treated effluents are then channelled into a natural depression within the plantation and a serial pond for mill and rubber factory effluents.

In 2024, 437.87 T of household waste was generated, while 97.62 T of plastic, 5.12 T of aluminium, and glass, as well as 0.67 T of E-waste, were generated within our concessions.



#### 4.3.4 Protection of Biodiversity



At Okomu, we are dedicated to reducing our environmental footprint and ensuring our activities do not impact vulnerable species or locations. Third-party assessments on environmental and biodiversity issues have been carried out, and the plantations have set aside 3 230.34 ha from exploited regions specifically for ecological purposes, such as natural vegetation zones, water corridors, buffer zones, and other safeguarded forests.

We also provided funding to a third party, Africa Nature Investors Foundation (ANI), to contribute to conserving biodiversity outside the company's concessions, but in the same landscape at the Okomu National Park (ONP). This is in addition to our collaboration with ONP, which is currently a biodiversity hotspot with several flagship species, coming under increasing threat and pressure from illegal activities and human encroachment in the form of agriculture, deforestation, and adjacent population growth.

Some animals within our concessions



Home's Hinge-back Tortoise

**Dwarf Crocodile** 



Tree Pangolin



#### 4.3.5 Air quality

At all industrial units that emit pollutants into the air, we have implemented filtration systems to decrease the quantity of particulate matter released, particularly at the boilers. A quarterly assessment of the ambient air quality is performed.

We have also instituted dust suppression programs during the dry season by allocating fire trucks and water tankers to wet the busiest roads of the plantation. Furthermore, speed limiters are installed on all our company vehicles, and speed bumps are built to reduce dust generated from speeding during the dry season. This is in addition to our zero-burning policy to reduce air pollution during land preparation.

We are also subject to local emissions regulations and policies, which include air quality standards set by the Nigerian Environmental Standards and Regulations Enforcement Agency (NESREA) receiving certifications from the agency for our compliance to its standards.

## 4.3.6 Energy

At Okomu, we are committed to responsible energy management by closely monitoring fuel and electricity consumption. Daily reports track our usage, allowing us to identify areas for reduction. Preventive maintenance of equipment, alongside modern installations, ensures optimal functionality and minimizes energy consumption.

To limit energy consumption, we have reduced our fuel usage by adhering to the yearly target on vehicles and on energy usage. With our connection to the national grid (BEDC) and use of turbines which generated 6 847 MWh in 2024 and distributed energy to all energy to all industrial and residential areas in the company. We have also successfully reduced the consumption of fuel on generating set for generation of power in our plantation.

We also adhere to all local energy regulations established by the Nigerian Electricity Regulatory Commission (NERC). And, as part of our commitment to compliance, our turbine and electrical installations have undergone inspections by NERC and the Nigerian Electricity Management Services Agency (NEMSA) and have been validated as meeting all regulatory requirements.



Turbine at Okomu's plantation



# 4.3.7 Training, awareness and orientation

At Okomu, we prioritize regular trainings' and sensitizations' programs to promote best practices in resource and waste management. Weekly toolbox talks are conducted across all departments, covering topics such as accident spill management, water conservation, and waste reduction.

Additionally, we conduct comprehensive orientations and inductions for all new employees, contractors, and visitors to familiarize them with Okomu's environmental management system.



reinforce learning, employees To are evaluated by their supervisors upon completing each structured training. This assessment ensures that knowledge effectively transferred and applied in daily By fostering a culture of operations. environmental awareness, we strengthen our commitment to sustainability and responsible resource management.

#### 4.3.8 Fire prevention

Every year, at the start of the fourth quarter, we activate our fire prevention and response system to coincide with Nigeria's dry season. This proactive approach ensures that necessary measures, including equipment readiness and staff training, are in place. Additionally, we engage with surrounding communities to discuss the safe use of fire for land preparation and the protection of High Conservation Value (HCV) areas.

Despite our preventive efforts, some fires originating from farmlands at the fringes of our concession still entered our concession in 2024. However, our Fire Service Unit acts swiftly to contain these incidents and prevent escalation.



Okomu Fire Service Unit during a drill

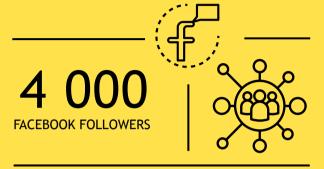


Okomu Fire Service Unit during a parade





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#### Conclusion

As we reflect on our progress and the challenges ahead, we remain steadfast in our commitment to a company that is sustainable.

Our sustainability journey is ongoing, and as we celebrate our achieved milestones, we are not oblivious of the fact that there are still much more to be done. We recognize sustainability is not just a goal but a way of life that we all must embrace every day, guiding our decisions, actions, and innovations.

Looking ahead, we are motivated by the opportunities to lead with purpose, transparency, and accountability. This report marks not an end, but a step forward in our shared mission toward a more sustainable world.

#### Glossary

ANI - Africa Nature Investors

ANI - Africa Nature Investors

BEDC - Company national grid

**BMP** - Best Management Practices

CLO - Community Liaison Officer

CPO - Crude Palm Oil

CSR - Corporate Social Responsibility

ESG - Environmental, Social, and Governance

ESOPP - Edo State Oil Palm Programme

**EUDR** - European Union Deforestation Regulation

Ext. - Extension

FFB - Fresh Fruit Bunch

FPIC - Free, Prior and Informed Consent

H - Hour

Ha - Hectare

HCS - High Carbon Stock

HCV - High Conservation Value

HR - Human Ressources

HSE - Health, Safety, and Environment

ILO - International Labour Organization

IMS - Integrated Management System

ISO - International Organization for Standardization

IT - Informative Technology

ITF - Industrial Training Fund

LSCT - Large-Scale Clonal Trial

MD - Managing Director

MoU - Memorandum of Understanding

NEMSA - Nigerian Electricity Management Services Agency

NERC - Nigerian Electricity Regulatory Commission

NESREA - National Environmental Standards and Regulations Enforcement Agency

NGO - Non-Governmental Organization

NHF - National Housing Fund

NIFOR - Nigeria Institute for Oil Palm Research

NSITF - Nigeria Social Insurance Trust Fund

OHS - Occupational Health and Safety

ONP - Okomu National Park

OOPC - Okomu Oil Palm Company

P&C - Principles & Criteria (RSPO)

PDA - Proposed Development Area

PIND - Partnership Initiative in the Niger Delta

PPE - Personal Protective Equipment

RSPO - Roundtable on Sustainable Palm Oil

SDG - Sustainable Development Goal

SON - Standard Organization of Nigeria

SOP - Standard Operating Procedure

T - Ton

TCPC - Technical Committee on Privatization and Commercialization

