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	OKOMU OIL PALM COMPANY PLC	Date: 20/04/2026
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1.0 Objective

OOPC does not condone the use of forced labour, bonded or debt labour, or human trafficking in any form whatsoever, by any person, company, or institution, as defined in the International Labour Organization's Forced Labour Convention (No. 29) and its 2014 Protocol, and in the Nigerian Labour Act.

2.0 Scope

This policy is applicable to all employment processes in OOPC, contractors, and third party contract workers, third party labour recruiters, workers in OOPC value chain, or any company and/or institution that does business with or on behalf of OOPC

3.0 Definitions

Forced Labour: is defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily, in line with ILO Convention No. 29. It can also be referred to as compulsory labour. Most common forms of forced or compulsory labour are slavery, misuse of prison work, bonded labour, debt labour, national as well as international human trafficking.

According to ILO Convention No. 105, forced labour is labour as a means of political coercion or education or as a punishment for holding or expressing political views, as a means of economic development or discipline, as a means of punishment for having participated in strikes and as a means of racial, social, national or religious discrimination.

Debt Bondage: a situation in which a worker's labour is demanded as a means of repayment of a loan or advance, where the value of the work performed is not applied towards liquidating the debt, or the terms of the debt are not clearly defined.

Trafficking in Persons: the recruitment, transportation, transfer, harbouring, or receipt of a person by means of threat, coercion, deception, or abuse of power, for the purpose of exploitation.

4.0 Guidelines

- OOPC shall always comply with all relevant and applicable national labour regulations and principles relating to the protection and welfare of workers, and shall reference the International Labour Organization's 11 Indicators of Forced Labour in identifying and assessing risk. In this regard, the company recognizes the effects of forced labour, which can persist to affect workers and their families, to include the following:
 - loss of income through unlawful wage deductions, withheld wages, or accumulated wage arrears;
 - debt bondage arising from recruitment fees, loans, or advances that trap workers in employment against their will;
 - retention of workers' identity documents or personal documents, restricting their freedom of movement;
 - restriction of workers' ability to enter or exit work or accommodation premises, or to access transport and communication with their families;
 - coercion into overtime or rest-day work without informed consent; and indulging workers in excessive overtime.
 - denial of a worker's right to freely enter into, or terminate, their employment.
 - exploitation of vulnerable workers—including women, pregnant or nursing mothers, migrant workers, persons with disabilities—by taking advantage of their legal, social, or economic vulnerability to impose unfair working conditions.
 - deception or misrepresentation of employment terms and conditions, including the nature of work, employer identity, work location, wages, deductions, bonuses, and housing or living conditions.
 - isolation of workers through practices that prevent them from seeking help, reporting abuse, or freely leaving their employment.
 - use of physical force, corporal punishment, sexual abuse or exploitation, or hazardous work assignments to intimidate, punish, or compel workers.
 - use of verbal, psychological, or institutional intimidation, including threats of violence or dismissal, to control or coerce workers.

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- Therefore, no worker in OOPC, whether directly employed, contracted, or supplied through a third party, shall be subjected to any form of forced labour, debt bondage, or trafficking.
- OOPC shall ensure that all contractors, suppliers, companies, or organizations of any kind engaged by OOPC, including third party labour recruiters, strictly abide by this policy. Third party labour recruiters shall be evaluated against this policy prior to, and during, engagement.
- No worker shall be required to pay recruitment fees or related costs, whether directly or indirectly, as a condition of employment. Where such fees have previously been charged to an active worker, OOPC shall ensure the worker is repaid.
- No wages, benefits, or deposits shall be withheld from workers as a disciplinary measure, as security, or as a means of restricting a worker's freedom to resign.
- Workers' government-issued identity documents and other personal documents shall not be retained by OOPC, except with the worker's informed consent for mandatory legal or immigration processing, and shall be returned without undue delay.
- Workers shall be free to enter and exit OOPC's work and accommodation premises, subject only to reasonable measures relating to health, safety, and security.
- Workers who reside on-site shall have access to transport and/or means of communication (telephones, Radios), and restriction of transport or communication shall never be used as a disciplinary measure.
- Overtime or rest-day work shall only be undertaken with the informed consent of the worker, and workers shall be afforded at least 24 consecutive hours of rest in every 7-day period.
- Workers shall have the unrestricted right to enter into, and terminate, their employment in accordance with their terms of employment, and no penalty shall be imposed for termination.
- Where migrant workers are employed, OOPC shall establish and implement specific labour procedures to protect them from forced labour and trafficking risk.

5.0 Remediations

- If any indicator of forced labour or trafficking in persons is identified, whether through worker interviews, document review, the OOPC grievance mechanism, or third-party recruiter due diligence, the affected worker(s) shall be immediately protected from further harm without loss of income, pending investigation.
- HSE Department, working with HR and, where relevant, the Union, Gender or Women's Welfare and Empowerment Committee, shall investigate any identified case within 14 days and develop a remediation plan, which may include repayment of fees or wages owed, return of retained documents, contract correction, or termination of the responsible contractor or recruiter relationship.
- Where trafficking in persons is suspected, the matter shall be referred to relevant law enforcement authorities in accordance with Nigerian law, in parallel with internal remediation.
- Records of any case, and its remediation, shall be maintained for up to five (5) years from the date of the worker's resignation or termination of employment.
- HR Department, in collaboration with HSE Department, shall ensure proper implementation and monitoring of this policy.
- This policy will be socialized to all workers, staff, contractors, third parties, visitors and suppliers, or anyone who does business with OOPC (as per OOPC communication procedure GP10).

6.0 Record of Approval

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