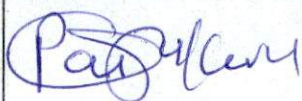


	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE	Date: 25/06/26
	GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Page 1 of 22
	Reference: P-SOP 01	



Action	Name	Function	Date	Signature
Prepared by	Paulyn Ojukwu	Gender Chairperson	25/06/2026	
Verified by	Mrs. Mabel Ekido	GPI	26/06/2026	
	Dr. Mariam Kadiri	GWSD	26/06/2026	
	Ikponmwosa Osunbor	HRM	29/6/2026	
	Mikle George	HSE Manager		
Approved by	Dr. Graham Hefer	Managing Director		

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 2 of 22

TABLE OF CONTENTS

1. POLICY STATEMENT	4
2. ABBREVIATIONS & ACRONYMS	4
3. SCOPE	5
4. POLICY AND SOP REQUIREMENTS	5
5. OBJECTIVE	6
6. DEFINITIONS AND TERMINOLOGY CLARIFICATIONS	6
7. GUIDELINES	7
8. PROCEDURE	8
8.1. COMPOSITION AND SELECTION OF GENDER COMMITTEE MEMBERS	8
8.2. COMPOSITION AND SELECTION OF WWEC	10
9. ROLE OF THE GENDER COMMITTEE	10
10. MEETINGS AND REPORTING STRUCTURE	12
10.1. FREQUENCY OF MEETINGS	12
10.2. QUORUM AND ATTENDANCE	12
10.3. AGENDA AND RECORD KEEPING	12
10.4. REVIEW AND CONTINUOUS IMPROVEMENT	12
10.5. WWEC MEETING AUTONOMY AND REPORTING	12
11. GENDER COMMITTEE TERMS OF REFERENCE	13
12. CONFIDENTIALITY CLAUSES	13
13. PROCEDURE FOR HANDLING CASES OF GBV & SEXUAL ABUSE & EXPLOITATION	14
14. ACKNOWLEDGEMENT AND IMMEDIATE SAFETY MEASURES	15
15. DECISION AND DISCIPLINARY ACTION	16
16. SUPPORT SERVICES FOR SURVIVORS	16
17. FEEDBACK AND RESOLUTION	16
18. MONITORING AND FOLLOW-UP	16
19. PREVENTION AND AWARENESS	17
20. CLOSURE AND RECORD KEEPING	17
21. CONFIDENTIALITY AND PROTECTION FROM RETALIATION	17

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 3 of 22

22. CAPACITY BUILDING	17
23. GENDER AWARENESS AND ADVOCACY ACTIVITIES.....	18
24. INVESTIGATION METHODOLOGY IN CASE OF SEXUAL ABUSE GRIEVANCES	18
25. ROLES AND RESPONSIBILITIES.....	20
26. RECORDS.....	21
27. REFERENCE.....	21
28. REVISION STATUS	22

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 4 of 22

1. POLICY STATEMENT

OOPC is committed to maintaining a positive climate at work in which individuals can work together in an environment free of all forms of gender discrimination, gender-based violence (GBV), sexual harassment, sexual exploitation and abuse, and discrimination on the basis of gender. OOPC strongly believes and supports gender equality, which emphasizes the need for policies and enforceable legislation to promote gender equality and opposes any form of gender discrimination and violence at the workplace. The Company is therefore obligated to provide a safe work environment which is free from any kind of bias and harassment. The company derives its authority from upholding the constitutional mandate (Sections 15, 17, 34, 35 and 42 of the Nigerian Constitution) and the Nigeria Labour Act 2004 (Section 73), as amended, the United Nations SDG 5, CEDAW Article 11 and African Union Women's Protocol Article 13, to ensure the human rights of the people under its jurisdiction and the dignity of men, women and children.

Any person whatsoever who is allegedly engaged in workplace sexual harassment or violence as defined by this policy, and possesses, uses, or threatens to use an unauthorized weapon, as defined by Nigerian law shall be violating the Violence Against Persons (Prohibition) Act. 2015. Part I. Section 2, as amended, or engages in off duty violence or misconduct that has a potential adverse impact on OOPC and its employees, suppliers and visitors, violates this policy and shall be considered as unacceptable personal conduct, and shall be dealt with under the provisions as stated in the (DAG) or under Edo State's VAPP Law 2021, as amended, which reflects efforts to address violence against persons, aligning with national initiatives and demonstrating commitment to protecting citizens.

- The HR department shall ensure implementation and monitoring of this policy and procedure.

2. ABBREVIATIONS & ACRONYMS

OOPC - Okomu Oil Palm Company PLC
 SDG – Sustainable Development Goals
 CEDAW – Committee for the Elimination of all forms Discrimination Against Women
 VAPP – Violence Against Persons Prohibition Law
 UN – United Nations
 NGO – Non-Governmental Organization
 GBV – Gender Based Violence
 SEA – Sexual Exploitation and Abuse
 SH – Sexual Harassment
 VAC – Violence Against Children
 DAG - Disciplinary Action Grid
 GP - Grievance Policy
 GCM – Gender Committee Member

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 5 of 22

VAPP – Violence Against Persons Prohibition Law 2021

SOP – Standard Operating Procedure

TORGC – Terms of reference gender committee

GPI – Girls' Power Initiative

GWSD – Global Women for quality and Sustainable Development

SARC – (Sexual Assault Referral Centre)

SBS – Security Base Supervisor

WVEC - Women's Welfare and Empowerment Committee.

TOR-WVEC - Terms of Reference – Women's Welfare and Empowerment Committee

HR – Human Resource

HSE – Health Safety and Environment

RSPO - Roundtable on Sustainable Palm Oil

3. SCOPE

This policy is applicable to every person on the company's premises at any time, including, but not limited to all staff and their families and friends, contractors, third parties, visitors and suppliers of OOPC (as per OOPC communication procedure GP 10).

4. POLICY AND SOP REQUIREMENTS

This policy requires the formation and operation of two complementary but distinct gender governance structures at OOPC:

- a. The Gender Committee (GC) shall serve as the central body tasked with overseeing and ensuring that this policy and SOP and the contents herein are accessible and adequately policed with the objective of providing men, women and children with a confidential, appropriate complaint mechanism against any inequality or unwelcome behavior of any manner, as stated in Clause 1.0 herein above. It also serves as a system to ensure fair, accountable, and representative procedures for redress and resolution. The GC operates with mixed-gender membership.
- b. The company also facilitates the formation of the WVEC as a formal subcommittee of the GC, composed exclusively of female workers, whose role is to serve as the dedicated platform for women workers to raise and discuss welfare, safety, empowerment, rights and workplace concerns. The WVEC is the primary channel through which OOPC engages with its female workforce on gender-related matters.

Both structures operate in a coordinated relationship. The Gender Committee Chairperson serves concurrently as the WVEC Chairperson, ensuring direct escalation and continuity between the two bodies. The GC is obligated to formally respond to all issues raised by the WVEC and to document actions taken or reasons where no action is taken.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 6 of 22

This policy also defines the physical, psychological, and emotional harassment (physical or verbal form) by any gender and the mechanisms of redress through the GC, WWEC and NGOs by looking at the specific structures, needs, and imperatives in OOPC.

5. OBJECTIVE

OOPC aims to fulfill its obligations under this policy by removing any barriers that prevent women from achieving equality and seeks to protect the rights of women, men and children. This policy tasks the GC and WWEC to incorporate and implement this and any other sexual harassment, child labour and protection of reproductive rights policies of OOPC in tandem with this policy. The GC and WWEC shall also endeavour to create a safe environment, foster a culture of respect and dignity, prevent violations through awareness and education programs, support survivors and promote accountability.

6. DEFINITIONS AND TERMINOLOGY CLARIFICATIONS

- 6.1 Gender equality - means the equal rights, obligations, opportunities, and liability of men and women in professional life, and the acquisition of education and participation in other areas of life;
- 6.2 Equal treatment for men and women - means ensuring that people receive the same compensation for the same work, regardless of gender; providing the same opportunities in education, leadership and career advancement; protecting individuals from gender-based bias, harassment or violence; promoting fairness in duties, decision making roles and representation; that there shall be no discrimination whatsoever based on gender, either directly or indirectly;
- 6.3 Direct discrimination based on gender - occurs where one person is treated less favorably on grounds of their gender than another is, has been, or would be treated in a comparable situation. Direct discrimination based on gender also means the less favorable treatment of a person in connection with pregnancy and childbirth, parenting, performance of family obligations, or other circumstances related to gender, and sexual harassment.
- 6.4 Indirect discrimination based on gender - occurs where an apparently neutral provision, criterion or practice would put persons of one sex at a particular disadvantage compared with persons of the other sex unless that provision, criterion or practice is objectively justified by a legitimate aim, and the means of achieving that aim are appropriate and necessary.
- 6.5 Women's Welfare and Empowerment Committee (WWEC) – means the all-female subcommittee of the Gender Committee, facilitated by OOPC in compliance with RSPO P&C 2024 Indicator 6.7.2, composed exclusively of female workers from all operational areas, which serves as the dedicated platform for female workers to discuss and address matters related to their welfare, safety, empowerment, rights, and workplace concerns.
- 6.6 Harassment has been defined under the categories of psychological, physical, and emotional. The following shall constitute harassment:

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 7 of 22

- Unwelcome acts like any visual, verbal, or physical conduct, such as loaded comments, remarks, or jokes, emails, letters, phone calls, text messages, gestures, physical contact, stalking, display of a derogatory nature or creating an intimidating, hostile, or offensive environment. (UN, Edo VAPP law 2021, as amended).
- Any unwelcome sexual advances, requests for sexual favors, or any conduct of a sexual nature (Verbal or nonverbal conduct) including indecent exposure, displaying sexually explicit images or materials. (UN, Edo VAPP law 2021, as amended).
- Any action or comment/s (racial, ethnic, religious, etc) that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. (Edo VAPP law 2021, as amended).
- Sexual Exploitation and Abuse (SEA): Involves sexual acts where one party exploits or abuses another, often involving power imbalance power dynamics.
- Sexual Harassment (SH): Unwelcome sexual advances, requests for sexual favors, or other verbal/physical conduct of a sexual nature affecting employment, work environment.
- Gender-Based Violence (GBV): Violence directed at individuals based on their gender, often reflecting societal power imbalances.
- Violence Against Children (VAC): Encompasses physical, emotional, sexual abuse, and all forms of neglect of children.

7. GUIDELINES

- To espouse the cause of the right to gender equality and the right to a dignified livelihood.
- To foster a social, physical, and psychological environment that will enable employees to work productively.
- Capacity building for gender sensitization through the organization of workshops, training programs, and discussions for promoting and enabling a gender sensitive work culture. Also, regular trainings will be conducted on awareness and confidence building of field staff with special focus on female staff.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 8 of 22

- Building skills and capacities on gender perspectives to enable greater participation of all sections of community in our programs will be one of our objectives in all programs.
- Anti-discrimination and anti-harassment policies with clear reporting and accountability mechanisms.
- Ensure policies apply equally across recruitment, promotion, pay, training, and benefits based on merit for men and women. Refer to OOPC's equal opportunity and no discrimination policy
- Create space to speak up against and actively challenge gender-based discrimination and harmful stereotypes within the Company through the GC and use of professional NGOs who shall be made available, at the company's cost, where applicable, to assist those in need.
- OOPC maintains zero tolerance towards sexual harassment and gender base violence of any magnitude, and harassers will risk disciplinary actions in line with OOPC's disciplinary action grid.
- Digital Safety and Online Conduct: To promote a respectful and inclusive digital environment, all staff must avoid any form of online harassment, cyberbullying, or the sharing of offensive content through company communication channels, social media, or messaging platforms. The Company recognizes that gender-based violence can also occur in digital spaces. Any form of online abuse such as sharing non-consensual images, sending unwelcome messages, or using digital platforms to intimidate or harass will be treated as a violation of this policy and subject to disciplinary action in line with the Disciplinary Action Grid (DAG).

8. PROCEDURE

8.1. COMPOSITION AND SELECTION OF GENDER COMMITTEE MEMBERS

To standardize the operations of the Gender Committee (GC), the committee shall comprise a balanced and diverse representation of the company's workforce.

Composition:

- The GC shall serve as the central body responsible for implementing the Gender Policy within the company.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 9 of 22

- The GC shall consist of at least five (5) members, with not less than 50% female representation.
- Members shall be drawn from management, staff, security and, where relevant, NGOs or community representatives to ensure diversity of gender, function, and hierarchy.
- Members must be of good conduct, approachable, and trusted by workers, especially women.
- Individuals with a known record of harassment, discrimination, or disciplinary sanctions shall not be eligible for membership.
- Where possible, members with skills or experience in gender studies, community engagement, diversity and inclusion, or related fields may be considered.
- The GC is at liberty to co-opt any person that they feel may be of benefit to their cause at any time.

Selection Process for New Members:

- When the GC identifies a need to add or replace a member (due to resignation, expiration of tenure, or performance concerns), the Chairperson shall notify the HR Department.
- HSE, in collaboration with HR and the Gender Committee Chairperson, shall coordinate the nomination process guided by criteria such as integrity, empathy, confidentiality, and gender balance, ensuring transparent communication to all departments.
- Interested employees may submit nominations through their departmental heads or directly to HR.
- The final list of selected members shall be endorsed by Management and formally announced to all staff.
- HR shall issue formal letters of appointment to all approved members.
- Newly inducted members shall receive orientation and training on gender equality, GBV, sexual harassment, and complaint handling procedures.
- All GC members shall sign the confidentiality and impartiality declaration at the beginning of each tenure.

Tenure and Replacement:

- GC members shall serve a term of two (2) years, renewable, after evaluation of performance and competencies.
- In cases of resignation, removal, or expiration of tenure, the same selection procedure shall be followed to fill the vacancy.
- The Chairperson shall ensure continuity of the GC's work during transitions.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 10 of 22

8.2. COMPOSITION AND SELECTION OF WWEC

The WWEC is composed exclusively of female workers and serves as the primary channel for engaging women workers on welfare, empowerment, safety, and rights matters.

Composition:

The WWEC shall be composed of appointed female members from the Gender Committee. By virtue of the GC nomination and selection process — through which members are nominated from their respective departments and operational areas — female GC members are already considered legitimate worker representatives for the purposes of the WWEC. No separate selection exercise is required.

Where any operational area does not have a female representative on the Gender Committee, a female worker from that area shall be nominated to serve on the WWEC, following the same GC nomination process outlined in Section 8.1. This ensures that women workers from all operational areas are represented on the WWEC at all times.

The Gender Committee Chairperson shall concurrently serve as WWEC Chairperson. The WWEC shall internally elect a Secretary from among its members to ensure autonomous facilitation of meetings.

No male worker shall hold membership in the WWEC

Tenure and Replacement:

WWEC membership shall run concurrently with GC membership tenure. Where a female GC member exits the Gender Committee for any reason, her WWEC membership shall cease simultaneously, and a replacement shall be identified through the GC nomination process. Where a supplementary WWEC member (nominated to fill an operational area gap) completes her term or exits, the same process shall apply.

All WWEC members shall sign the WWEC Confidentiality and Commitment Declaration at the commencement of their tenure.

9. ROLE OF THE GENDER COMMITTEE

The GC, together with the NGOs, shall be mandated to carry out the following;

1. To play a preventive role by making efforts towards sensitization of the staff on gender issues by conducting periodic programs and in-house workshops/gatherings.
2. To take up complaints, confidentially, about sexual harassment, workplace issues, gender-based violence and child abuse, and to work together with the above NGO partners who are equipped to conduct proper investigations, provide assistance and redress to the survivors, recommend penalties and action against harassers, appropriately, and within the framework of the law.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 11 of 22

3. Ensure safety, equality and zero discrimination at all levels in the workplace.
4. To ask the NGO partners to recommend and to make arrangements for appropriate emotional, psychological, and physical support (in the form of counselling and other assistance at the company's cost, where applicable).
5. Recommend and oversee the provision of childcare facilities.
6. Recommend the provision of alternative jobs for pregnant women based on doctor's recommendations.
7. To ensure that breastfeeding mothers are given specific break times to enable effective breastfeeding.
8. To raise awareness, identify and address issues of concern, as well as opportunities and improvements for all under the auspice of this gender policy.
9. Advise management/leadership on how policies, programs or decisions affect women, men and children differently.
10. Recommend measures to address gender gaps, e.g.: recruitment, promotions, and leadership representation if required.
11. Represent the Company in external forums on gender equality, build partnerships with NGOs, government agencies, and international bodies working on gender-based issues.
12. Promote initiatives such as mentorship for women, flexible work policies, and social lives, where applicable.
13. Foster an inclusive environment where both men and women can thrive, equally.
14. Provide a confidential and safe channel for staff or members to report gender-related complaints (including sexual harassment and discrimination) using NGOs with the requisite qualifications and experience to do so, and access to whistleblower hotline telephone numbers.
15. Ensure, together with the NGO partners, timely and fair investigation of cases.
16. Ensure, together with the NGO partners, that, where applicable, they recommend action and support for survivors/survivors, while ensuring no retaliation.
17. Ensure that they and the NGO partners follow-up on cases reported, even to the level of attending court hearings with the help of the selected NGOs, if necessary.
18. Ensure issues presented by the Gender Committee and WWEC are responded to by management.
19. Document action taken by management, and where action is not taken, it should be recorded with reasons.
20. Keep a confidential record of gender-related issues or grievances raised and/or redressed, together with OOPC's NGO partners.
21. Collaborate with the HSE Committee to address specific health and safety risks for women workers.
22. To oversee and support the WWEC as a subcommittee, receive and formally respond to issues escalated by the WWEC, and document all actions taken or reasons where action is not taken.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 12 of 22

10. MEETINGS AND REPORTING STRUCTURE

To ensure effective coordination, transparency, and prompt resolution of gender-related issues, the Gender Committee (GC) shall operate within a defined meeting and reporting structure.

10.1. Frequency of Meetings

- The GC, together with the NGO partners, shall convene regular meetings, but at least once every quarter, to review activities, cases handled, and progress on gender initiatives, bearing in mind at all times, the sensitivity and confidentiality of these cases.
- Emergency meetings may be called by the Chairperson upon receipt of urgent complaints or gender-related incidents requiring immediate attention.
- Meetings shall be scheduled in advance and communicated to members at least five (5) working days prior, except in emergency situations.

10.2. Quorum and Attendance

- A minimum of two-thirds ($\frac{2}{3}$) of the total members, including at least one female representative, shall constitute a quorum for meetings.
- Persistent absence (three consecutive meetings without valid reason) shall attract disciplinary action and/or replacement by management upon the committee's recommendation.

10.3. Agenda and Record Keeping

- The Secretary shall circulate the meeting agenda, previous minutes, and supporting documents prior to each meeting.
- Accurate minutes shall be recorded, reviewed, and approved by members at the next meeting.
- All records of proceedings, complaints, and resolutions shall be kept confidentially and stored in both soft and hard copies in the custody of the NGO partners, HR and GC.

10.4. Review and Continuous Improvement

- The effectiveness of GC meetings and reporting shall be reviewed annually by the GC and the NGO partners to identify gaps and improve gender governance. Recommendations from such reviews shall be documented and implemented through HR and Sustainability oversight.

10.5. WVEC Meeting Autonomy and Reporting

The WVEC shall operate with full autonomy in managing its own meeting schedule, agenda, and deliberations

- The WVEC shall determine its own frequency of meetings. OOPC shall not prescribe or restrict the meeting schedule of the WVEC.
- OOPC shall provide a safe, private, well-ventilated, well-lit, and culturally appropriate meeting space for all WVEC meetings, at no cost to the members.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 13 of 22

- Meetings shall be conducted in a language understood by all WWEC members.
- WWEC meeting minutes shall be documented by the WWEC Secretary and forwarded to the GC Chairperson.
- Issues requiring management attention or action shall be formally escalated by the WWEC through the GC to the Management

11. GENDER COMMITTEE TERMS OF REFERENCE

See form TORGC

See form TOR-WWEC

12. CONFIDENTIALITY CLAUSES

Confidentiality helps to protect survivors from further trauma, stigma or retaliation. It can encourage survivors to seek help when necessary.

a. Scope of Confidentiality

All information related to complaints, investigations, and deliberations must be kept strictly confidential. This applies even to oral, written, and electronic information.

b. Persons Bound by Confidentiality

Committee members, investigators, witnesses, and any staff handling complaints as well as external consultants or experts brought in must also comply with this confidentiality rule.

c. Protection of Complainant and Respondent

The identity of the complainant, respondent, and witnesses must not be disclosed, except where required by law or organizational procedures. Information is shared strictly on a need-to-know basis.

d. Permitted Disclosures

Disclosure is only allowed with the written consent of the complainant:

To the NGOs concerned.

To the committee for investigative purposes.

To relevant authorities (eg. HR, legal, or law enforcement) if necessary.

e. Consequences of Breach

Any unauthorized disclosure will lead to disciplinary action, which may include suspension, termination, or legal consequences.

f. Record Keeping

All records are to be securely stored (locked files, password-protected systems).

Access is restricted to authorized persons only, namely an authorised member of the GC and/or recognised NGO, hospital or police.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 14 of 22

g. Assurance of Non-Retaliation

Complainants and witnesses are protected against survivorization or retaliation for reporting or participating in an investigation. If any complainant feels that this process has not been done, they are welcome to place a grievance with OOPC using the Grievance Form (OOPC/Form 1.53).

13. PROCEDURE FOR HANDLING CASES OF GBV & SEXUAL ABUSE & EXPLOITATION

Handling cases of GBV, sexual abuse requires a clear, survivor-centered, confidential, and rights-based procedure. The GC and WWEC should follow step-by-step procedures to protect survivors, ensure fair investigation, and take corrective action.

In ALL cases:

When any alleged GBV/VAC is reported at OOPC Main Estate, Ext 1 and Ext 2, the following steps are to take place in the following order:

1. Case is reported by the survivor to either the:

1.1 a Security Base supervisor, and/or

1.1b SBS Action: Call the on-duty GCM as per the GCM duty list.

Or

2.1a The Gender Committee Member, and/or

2.1b GCM Action: Call the Security Base Supervisor

2. In the event that the survivor and the alleged perpetrator are together at the time the case is being reported, it is the duty of the SBS to separate them, and if possible, keep them in two separate rooms.

3. On arrival at the security base the GCM will take control of the incident with the assistance of SBS if so required by doing the following:

3.1 The GCM will do a quick assessment of the survivor to identify any injuries and if the survivor requires medical assistance.

3.2 If medical assistance is required, the GCM will notify the SBS, who will call TOC, either by IP Phone or Radio, and ask for an ambulance to be dispatched to the Security Base location.

3.3 The survivor is asked for their consent to proceed with legal action against the alleged perpetrator (using controlled Form 20 Gender case report form) from the GCM.

3.4 Depending on the nature and the severity of the injuries a full statement can be taken either pre or post medical treatment.

3.5 Even in the event of consent not being obtained, the survivor may still be sent for medical examination and treatment if so required. The survivor shall sign off on Form 20 that they do not wish to proceed with any action and that the alleged incident should be closed. The alleged perpetrator shall then be

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 15 of 22

released by the SBS after making a statement that shall be retained internally for future reference (TOC, CLINIC and Gender Committee log). No further action will be required by the GCM or SBS in this regard.

- 3.6 If the survivor gives consent to proceed with action, the GCM member shall conduct a private and respectful interview whereby all the information regarding the incident is recorded in chronological order on Form 20 Gender Case Report Form. The survivor, on completion of the Form 20, shall sign her consent to further action being taken.
 - 3.7 The ambulance will then take the survivor to the OOPC main clinic where she/he will undergo a medical examination, if required, before leaving for the NGO's facility (SARC) located in Benin City. In the case of a mother being the survivor her children are to accompany her in the ambulance to SARC.
 - 3.8 The alleged perpetrator will be taken to the police station at Mirror Gate where he will complete a statement and shall be detained pending further direction from the NGO and/or Nigerian Police. The SBS shall be relieved of his commitments at this point.
4. The NGO will then take over the investigation from the GMC on the arrival of the survivor at SARC and shall proceed with all necessary documentation, processing and rehabilitation required by the survivor.
 5. The corrective actions for both the perpetrator and survivor pertaining to the above procedure should be performed in conjunction with clauses 15, 16, 17 and 25.

REPORTING/COMPLAINTS SUBMISSION

OOPC shall provide safe, accessible and confidential channels for reporting complaints e.g. hotline (08134631183), email (aforson@okomunigeria.com), GC/WWEC member, suggestion boxes, or directly to the NGO partners on the following numbers; 07067128094 GPI and 07038884680 GWSD.

OOPC shall allow both survivors and third parties (witness) to report in a confidential environment.

OOPC shall ensure the complainant is informed of their rights and available support services.

14. ACKNOWLEDGEMENT AND IMMEDIATE SAFETY MEASURES

GC/WWEC members (including security GC/WWEC members) and NGOs shall:

- Record the complaint in the Gender Case Register and acknowledge receipt of the complaint sensitively.
- Assess immediate safety risks to the survivor e.g. medical care, relocation and protection.
- Inform the complainant/survivor of their rights, process steps, and available support services (medical, psychosocial, legal, etc.).

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 16 of 22

- Inform the complainant/survivor of the process and expected timelines.
- Provide urgent support such as medical attention, psychosocial counselling.
- Refer the survivor to the applicable NGOs for further action, including, but not limited to shelter, legal advice and hospitals.
- GC/WVEC designated officer and NGO open a file on the survivor and reviews the complaint.
- GC/WVEC designated officer liaises with the NGO on the following:
 - Determine whether the case falls within the company's jurisdiction.
 - Decide whether the matter should be referred to external agencies (e.g., police, hospital, or legal aid) where required.
 - Identify immediate safety risks and ensure survivor support.
 - Frivolous or malicious complaints shall be documented and dismissed only after review, with reasons recorded.
 - The gathering of evidence: interviews, documents, witness statements ensure both survivors and accused are heard fairly.
 - Apply a trauma-informed approach (no survivor-blaming).

15. DECISION AND DISCIPLINARY ACTION

The NGO shall submit their findings to the GC and management/authority.

If there is a judgement, management, in conjunction with any legal judgement, shall apply appropriate disciplinary measures (warning, suspension, dismissal, legal action, depending on severity).

If criminal, refer to law enforcement (with survivor's consent, where applicable).

If the allegation is unsubstantiated, both parties shall be informed, and the record securely archived.

16. SUPPORT SERVICES FOR SURVIVORS

OOPC, together with the NGO provides, where needed, access to:

- Medical services (including post-rape care).
- Psychosocial counseling.
- Legal aid or advice.
- Safe housing/shelter if necessary.

17. FEEDBACK AND RESOLUTION

The GC and NGO shall:

- Inform the survivor (and respondent, if appropriate) of the outcome.
- Document the case, decisions, and actions taken.
- Maintain strict confidentiality in reporting.

18. MONITORING AND FOLLOW-UP

- Check in with the survivor to ensure they are safe and supported.
- Monitor to prevent retaliation or further harm.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 17 of 22

- Review lessons learned to strengthen GBV prevention measures.

19. PREVENTION AND AWARENESS

- Use the case (without breaching confidentiality) to improve awareness, staff training, and preventive policies.
- Regularly review and update the GBV response procedure.

20. CLOSURE AND RECORD KEEPING

- A case shall be considered closed once all actions are implemented and both parties have been duly notified.
- Closed files shall be archived confidentially for a minimum of six (6) years, accessible only to authorized personnel.
- Summary statistics (number of cases, types, outcomes) shall be included in quarterly Gender Committee reports.

21. CONFIDENTIALITY AND PROTECTION FROM RETALIATION

- All information related to gender complaints shall remain strictly confidential.
- Retaliation, intimidation, or survivorization of complainants, witnesses, or investigators is prohibited and shall attract disciplinary measures.
- The NGO partner shall provide independent oversight to ensure ethical standards and survivor protection are maintained.

22. CAPACITY BUILDING

- The GC in collaboration with the NGO partner shall develop an annual gender training plan to promote knowledge on gender equality, GBV prevention, and sexual harassment response.
- Mandatory induction sessions on gender sensitivity and harassment prevention shall be conducted for all new employees.
- The WVEW through the Gender Committee shall coordinate bi-annual refresher trainings for staff and departmental gender representatives.
- Training content shall include:
 - Women rights
 - Gender roles and equality in the workplace.
 - GBV and sexual harassment recognition and response.
 - Communication and confidentiality ethics.
 - Survivor-centered approaches and complaint handling.
 - Roles and responsibilities of gender representatives and WVEC members.
- The NGO partner shall facilitate expert-led workshops and provide technical input for training materials.
- Attendance registers, training materials, and participant feedback forms shall be maintained by the GC for audit and reporting purposes.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 18 of 22

23. GENDER AWARENESS AND ADVOCACY ACTIVITIES

The GC and WWEC shall design and implement periodic awareness programmes aimed at strengthening gender inclusion and promoting a respectful work environment.

Activities shall include:

- Quarterly gender awareness campaigns in estates, plantation, mills, and factory.
- Commemoration of key global events such as International Women's Day, International Day for the Elimination of Violence Against Women, and International Men's Day.
- Dissemination of gender information materials (flyers, posters, handbills, newsletters).
- Promotion of gender-sensitive messaging through toolbox talks, departmental briefings, and company-wide communications.
- Encouragement of peer-to-peer advocacy, where trained gender reps share lessons with colleagues at departmental levels.
- WWEC-led engagement sessions with female workers in all operational areas, at least once per quarter.

All awareness and advocacy outcomes shall be documented and reported during GC quarterly meetings.

24. INVESTIGATION METHODOLOGY IN CASE OF SEXUAL ABUSE GRIEVANCES

Investigating sexual harassment and abuse grievances requires a sensitive, fair, and structured methodology so that survivors are protected, respondents are treated fairly, and the organization maintains credibility.

Here are the main methods to adopt in investigation methodology:

1. Preparation Stage

The GC/WWEC representative should:

Acknowledge the complaint promptly and assure confidentiality and inform the NGO who shall then advise the GC/WWEC member on the most appropriate course of action for the complainant which is normally to bring them to the NGO partner's location for safety and investigative reasons.

The survivor and accused will be taken to the NGO partner's location for further investigation by the NGO partner's medical and/or legal advisors, at OOPC's cost, where applicable.

2. Information Gathering Methods by the NGO/GC:

a) Interviews

The NGO, in collaboration with the GC and the NGO's legal advisors to conduct individual, confidential interviews with:

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 19 of 22

The complainant (survivor).

The respondent (accused).

Witnesses, if any.

Use open-ended, non-leading questions.

Apply a trauma-informed approach: avoid survivor-blaming, allow the survivor to speak freely, and ensure they feel safe.

b) Document Review

The GC shall, together with the NGO partners, review relevant records: emails, text messages, call logs, CCTV footage, HR records, attendance registers, or prior complaints.

The GC shall check and guide the NGO partners on OOPC organizational policies and codes of conduct for breaches.

c) Written Statements

The NGO partner, together with the GC, shall ask the complainant, respondent, and witnesses to provide signed written statements using Gender Case Report form (GF 20).

d) Corroborating Evidence

The Legal advisors of both the NGO partners and the GC shall:

Look for indirect evidence: patterns of behavior, testimonies of others, prior warnings/disciplinary records; and

Maintain the principle of “preponderance of evidence” (balance of probabilities) rather than demanding proof beyond reasonable doubt, since it’s not always possible in harassment cases.

3. Analysis and Documentation

Legal advisors of both the NGO partners and the GC shall:

Compare testimonies and evidence for consistency and credibility.

Document every step of the process (dates, interview notes, evidence reviewed).

Ensure decisions are based on facts, not assumptions or stereotypes.

4. Principles to Guide the Investigation

Confidentiality: Protect identities and information.

Impartiality: Investigators must be neutral and avoid bias.

Timeliness: Conclude investigations quickly (e.g., within 30 working days).

Fair Hearing: Both complainant and respondent must be heard.

Non-retaliation: Protect the survivor and witnesses from backlash.

Sensitivity: Handle cases with respect, empathy, and cultural awareness.

5. Outcome and Recommendations

If not taken up by the NGO partner’s and/or OOPC’s legal advisors, the GC and NGO who shall constitute the investigative panel, shall submit a written report with:

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 20 of 22

Findings of fact, an analysis of whether the policy/law was breached and recommendations for disciplinary action, support, or referral to external authorities (police, legal aid).

25. ROLES AND RESPONSIBILITIES

(a) Prevention:

The GC/WWEC and NGO shall:

Organize awareness and training sessions on gender equality and GBV prevention programs and mainstream gender considerations into organizational policies and programs.

(b) Response:

The GC/WWEC together with the NGO shall:

- Receive and review complaints of harassment, discrimination, or GBV.
- Ensure a fair, timely, and confidential investigation process.
- Recommend appropriate disciplinary actions in line with the law and organizational rules.

(c) Support:

The GC together with the NGO shall:

- Provide referrals for medical, psychosocial, and legal support for survivors.
- Ensure non-retaliation and confidentiality in all cases.

(d) Monitoring & Reporting:

The GC, together with the NGO shall:

- Monitor compliance with this policy.
- Prepare periodic reports for management with recommendations for improvement.
- Review the policy periodically to align with evolving best practices and legal frameworks.

(e) Disciplinary Actions

Depending on the severity of the violation, disciplinary actions may include:

- Verbal or written warning.
- Mandatory counseling or training.
- Suspension without pay.
- Termination of employment or membership.
- Referral to law enforcement or judicial processes.
- The GC and NGO shall confirm the disciplinary action to be taken and refer to the HR department in this regard, and the HR department shall then institute disciplinary action against the perpetrator. If the perpetrator is to be referred to the law enforcement and judicial processes, then the NGO partner shall oversee this process.

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 21 of 22

(f) Accountability and Review

All staff, management, and committee members are accountable for adherence to this policy.

The Gender Committee shall review this policy and SOP in accordance with the Standard Operating Procedure on review of Policies (GP 01), or as required by changes in the legal framework.

26. RECORDS

- a) Gender Committee Meeting Minutes
- b) Complaint/Incident Forms and Investigation Reports
- c) Gender roles and responsibilities
- d) Gender Committee Terms of reference
- e) WVEC Terms of Reference (TOR-WVEC)
- f) WVEC Meeting Minutes
- g) GC and WVEC Member Appointment Letters
- h) Gender toolbox talks reports
- i) Gender Training Attendance Records
- j) GBV Case Register and Follow-up Logs
- k) GF 20

27. REFERENCE

- a. OOPC Gender Policy and GBV SOP (this document)
- b. RSPO Principles and Criteria 2024, Indicators 6.7.1, 6.7.2, 6.7.3, 6.7.4, 6.9.5(C)
- c. Nigerian Labour Act (2004)
- d. Violence Against Persons (Prohibition) Act, 2015
- e. Edo State VAPP Law 2021
- f. ILO Convention 190 on Violence and Harassment, 2019
- g. ILO Convention on Discrimination (Employment and Occupation) No. 111
- h. UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- i. UN Women's Empowerment Principles
- j. African Union Women's Protocol, Article 13
- k. Sustainable Development Goal (SDG) 5 – Gender Equality
- l. OOPC Disciplinary Action Grid (DAG)
- m. OOPC Grievance Policy and Grievance Form (OOPC/Form 1.53)

	Document title	Revision: 2
	POLICY AND STANDARD OPERATING PROCEDURE GENDER EQUALITY, GENDER BASED VIOLENCE, SEXUAL EXPLOITATION & ABUSE	Date: 25/06/26
	Reference: P-SOP 01	Page 22 of 22

28. REVISION STATUS

Rev.	Date	Details
0	13/11/25	Initial Release
1	17/04/26	Added one more point to section 8.1 "Composition" Rephrased the first point in section 10.1 "Frequency of Meetings" Referred to Terms Of Reference Gender Committee in section 11 "See form TORGC" Added more points to section 13 "Procedure for Handling Cases of GBV & Sexual Abuse & Exploitation"
2	25/06/26	Added WWEC as formal subcommittee (Sections 4, 8.2, 10.5, 26, 27) to comply with RSPO P&C 2024 Indicator 6.7.2; dual-chair arrangement formalised; WWEC-specific records added; references updated.