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1.0 Policy Statement

Respect for human rights is a fundamental value of OOPC. We strive to respect and promote human rights in accordance with the UN Guiding Principles on business and human rights in our relationships with our employees, suppliers and stakeholders. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. This Human Rights policy elaborates on the requirement within our code of ethics policy to treat everyone at OOPC - and everyone with whom we come into contact - with fairness, respect and dignity. OOPC is committed to conducting ongoing Human Rights and Environmental Due Diligence (HREDD) to identify, assess, prevent, mitigate, track, and account for actual and potential adverse human rights and environmental impacts connected to our operations and supply chain. This commitment is operationalized through the OOPC Human Rights and Environmental Impact Assessment (HREIA) process, as detailed in Section 5 of this policy, and is aligned with RSPO Principles & Criteria 2024 Indicator 1.3.1. OOPC is committed to protecting individuals and their reports, complaints or disclosures filed in good faith. We also recognize that Human rights defenders work to promote transparent and accountable governments, clean and safe environments, fair working conditions, and equitable societies. They play a critical role in fostering corporate transparency and respect for human rights, such as monitoring of supply chains, exposing corruption, and protecting our shared environment. Based on this, we provide access to reliable channels to report wrongdoing; robust protection from all forms of retaliation; and mechanisms for reporting that promote reforms that correct legislative, policy or procedural inadequacies and prevent future wrongdoing. We also prohibit intimidation and harassment, including from security services/forces. This Policy is guided by the Universal Declaration of Human Rights, including those contained within the international Bill of rights and international labour organization's 1998 Declaration on Fundamental principles and rights at work, United Nations declaration on Human Rights Defenders, The International Covenant on Civil and Political Rights (explicitly referencing the protection of whistleblowing as an aspect of freedom of expression under Article 19), The International Covenant on Economic, Social and Cultural Rights; Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); The International Labour Organisation's (ILO) Declaration on Fundamental Principles and rights to work; and RSPO Policy on the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons.

2.0 Scope

This policy applies to all OOPC's employees, migrant workers, seasonal workers, contractors, service providers, third party workers, suppliers, and value chain. It also covers the Human rights defenders (HRD), Environmental human rights defenders, whistleblowers and complainants within our stakeholders group, including community spoke persons. In implementing this Policy, we are subject to the laws of Nigeria and we are committed to complying with all such applicable laws. Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible. Where local laws prohibit us from upholding certain aspects of this policy, we will comply with these local laws while continually seeking to respect and protect human rights. OOPC strives to prioritize the management of the human rights impacts of our business activities based on the operational context, our leverage and business relationships. As a result, we concentrate on our own operations and contractors/suppliers, most specifically on human rights related to labour conditions. OOPC, however, recognizes that other human rights may become greater priorities over time and we will regularly review our focus areas.

3.0 Definitions

Adequate: Capable of leading to the identification and punishment of those responsible

Environmental Human Right Defenders: Individuals and/or groups who, in their personal or professional capacity and in a peaceful manner strive to protect and promote human rights relating to the environment, including water, air, land, flora and fauna. They are characterized through their actions to protect environmental and land rights. Although they may work as journalists, activists or lawyers who expose and oppose environmental destruction or land grabbing, in many cases they are indigenous leaders or community members who defend their traditional lands against the harms of large - scale development projects.

Human Rights Defenders (HRD's): Individuals, groups or associations who promote and protect universally recognised Human Rights and contribute to the elimination of all forms of violations and fundamental freedoms of individuals and peoples. This definition does not include those individuals who commit or propagate violence.

Impartial and independent: Those responsible for carrying out the investigation must be fair and not reliant only on the parties involved in the events under investigation;

Prompt: The investigation must be commenced swiftly and be completed within a reasonable time;

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Reasonable belief: is defined as when a person could reasonably suspect wrongdoing in light of available evidence.

Thorough: Comprehensive in scope and – among other things – capable of identifying any systematic failures that led to the violation;

Whistleblower: Is anyone who exposes (reports) fraud, extortion, or sabotage to the relevant authority.

HREDD (Human Rights and Environmental Due Diligence): An ongoing management process by which a company identifies, assesses, prevents, mitigates, tracks, and accounts for actual and potential adverse human rights and environmental impacts linked to its operations, supply chain, and business relationships.

HREIA (Human Rights and Environmental Impact Assessment): The structured impact assessment process comprising gap assessment, country risk, company evidence reviews, and stakeholder engagement used by OOPC to operationalize HREDD.

Salient Human Rights Issue: A human rights or environmental impact that is most at risk of being severe through the company's activities or business relationships, prioritized by severity (scale, scope, irremediability) and likelihood in accordance with UNGP guidance.

Reasonable Belief: When a person could reasonably suspect wrongdoing in light of available evidence.

4.0 Guidelines

OOPC commits to:

- Recognize and respect the rights of all workers, including the workers of contractors, temporary workers or migrant workers. Our commitment is further manifested in policies such as the Code of Ethics Policy, Sexual Harassment Policy, Child Labour Policy, HIV/AIDS Policy, Safety and Healthy Workforce policy, Forced labour and Human Trafficking policy and amongst others.
- Conduct our business in a manner that respects the rights and dignity of all people whilst complying with all legal requirements.
- Treat everyone who works for OOPC fairly and without discrimination. Our employees, contractor staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- Respect freedom of association and ensure there is no forced, trafficked, bonded, or indentured labour in our supply chain-
- Recognize and respect the rights of local and indigenous communities by respecting their cultures, customs, values and land tenure rights. We commit to obtaining Free, Prior and Informed Consent from local communities before commencing new operations and commit to open, transparent, fair and equitable conflict resolution.
- Ensure the provision of security is consistent with laws of Nigeria, using security services only where necessary and requiring the use of force only when necessary and proportionate to the threat.
- Continue to build the awareness and knowledge of our management, employees, migrant workers, seasonal workers and contractors/suppliers on labour rights and this policy and encouraging them to speak up, without retribution, about any concerns they may have.
- Grant protection for reports made by HRD with a **reasonable belief** that the information is true at the time it is disclosed.
- Protect individuals to safeguard the individuals' physical and psychological integrity and that of their family group, their property and working conditions; against violence, threats, all forms of retaliation, direct or indirect, pressure or any other arbitrary action as a consequence of the individual's legitimate exercise of their fundamental human rights in the course of their engagement with OOPC or as a result of their report against violation of human rights.
- Protect individuals from all forms of retaliation, disadvantage or discrimination (all types of harm, including but not limited to: dismissal, probation and other job sanctions; punitive transfers; harassment; reduced duties or hours; withholding of promotions or training; loss of status and benefits; and threats of such action) in workplace linked or resulting from HRD activities. OOPC seek to preserve the individual's confidentiality. The identity of the individual may not be disclosed without the individual's explicit informed consent.
- Ensure employees and workers have the right to decline to participate in corrupt, illegal or fraudulent acts.
- Provide protection against threat to individuals who have disclosed information anonymously including those who subsequently have been identified without their explicit consent.
- We operate in full compliance with applicable national wage laws, including those relating to minimum wage, overtime hours and legally mandated benefits. Working hours for our employees shall be limited to what is permitted by local laws.

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4.1 Human Rights and Environmental Due Diligence (HREDD) Commitments

In fulfilment of RSPO P&C 2024 Indicator 1.3.1 and the UN Guiding Principles on Business and Human Rights (Principles 11–24), OOPC further commits to:

- Respect the rights of people in communities impacted by our activities and maintain a transparent and open dialogue with them. We will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- Seek to make contractual commitments with contractors/suppliers that encourage them to adhere to the same principles.
- Conduct ongoing Human Rights and Environmental Due Diligence (HREDD) through a structured Human Rights and Environmental Impact Assessment (HREIA) process comprising four phases: Gap Assessment, Country-Level Risk Assessment, Company Evidence Review, and Stakeholder Impact Assessment. This process is aligned with RSPO P&C 2024 Indicator 1.3.1, the UN Guiding Principles, and the OECD Due Diligence Guidance for Responsible Business Conduct.
- Prioritize human rights and environmental impacts based on their saliency i.e, assessed by severity (scale, scope, and irremediability) and likelihood in accordance with UNGP guidance. Severity is always the primary factor; irreversible harms are always treated as Very High severity regardless of likelihood.
- Recognize that environmental degradation including deforestation, water contamination, hazardous chemical exposure, and biodiversity loss directly threatens the rights of communities who depend on those natural systems for livelihood, health, and cultural survival; therefore, advocate no deforestation, no peat conversion, no burning and protection of water and biodiversity. OOPC's HREDD process therefore integrates environmental due diligence alongside human rights due diligence.
- Develop a time-bound HREDD Action Plan with named responsible persons, target timelines, and measurable KPIs to address salient risks. The Action Plan shall be reviewed at least every two years.
- Address root causes of recurring human rights and environmental issues through systemic management changes, not only individual incident responses.
- Continue increasing the capacity of our management to effectively identify and respond to human rights and environmental concerns.
- Place importance on the provision of effective company-based grievance mechanism which is applicable to all stakeholders to ensure remediation of potential abuses. Any stakeholder with concerns regarding the human rights impacts of OOPC's activities may raise these through the grievance management process
- Ensure full range of remedies, covering all direct, indirect and future consequences of any reprisals including wage restitution, medical care, reinstatement, and land access restoration as appropriate
- Ensure that any investigation is **adequate, thorough, impartial, independent and prompt**; and a sufficient element of transparency of the investigation or its result to ensure accountability.
- Communicate HREDD commitments and progress annually through public reporting that covers salient risks identified, actions underway, and progress made acknowledging challenges and areas of ongoing concern, not only policies and achievements.

This policy will be communicated to all workers in OOPC operations, suppliers and neighbouring communities near OOPC operations in accessible language and format.

The Human Resource Manager in collaboration with the HSE Manager shall ensure implementation and monitoring of this policy

5.0 Record of Approval

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

