

	Document title	Revision: 7
	OKOMU OIL PALM COMPANY PLC	Date: 09/05/2026
	CODE OF ETHICS POLICY	Page 1 of 1

1.0 Policy Statement

The Okomu Oil Palm Company (OOPC) is committed to demonstrating the highest level of regard for business ethics, environmental practices, and full compliance with all applicable laws pertaining to them.

2.0 Scope

This policy is applicable to all stakeholders doing business with, or who are on the premises of OOPC at any time.

3.0 Definition

Code of ethics: A written set of guidelines issued by an organization to its staff, management and stakeholders to help them conduct their actions in accordance with its primary values and ethical standards.

4.0 Guidelines

OOPC is committed to:

- Complying with all international, national and local legislation, regulations, and OOPC's own policies in conducting its business.
- Timely, accurate and truthful disclosure of reports and documents filed with or submitted to regulators, and in other public communications made by OOPC.
- Using its funds and assets for lawful corporate purposes only, and to maintain OOPC's financial integrity.
- Prohibiting all forms of corruption, bribery, fraudulent use of funds and resources including money laundering in line with the money laundering (prevention and prohibition) Act 2022, Act No. 14 among all parties working for or on behalf of OOPC as contained in OOPC's Anti-bribery and Anti-corruption policy.
- OOPC complies with the United Nations Convention against Corruption, Article 12, which prevents corruption involving the private sector.
- Prohibiting the employment of all forms of involuntary or underage labour, and child labour, in our operation, including contractors, sub-contractors, suppliers.
- Fair and appropriate disciplinary practices and recognition of the entitlement of all individuals to be treated equitably with dignity and respect.
- Advocate the right of its employees to freedom of association and to maintain a workplace free from discrimination, physical or verbal abuse, threats, intimidation, bullying and harassment, whilst embracing diversity and respecting the personal dignity, rights and privacy of every employee.
- Provide a safe and healthy work environment for its employees, including the vulnerable, and managers and encourage adherence to environmental, social, safety and health rules (as per OOPC Environmental and Safety Aspect procedure GP08).
- Protect its assets and ensure their efficient use by all persons working for or on behalf of OOPC.
- Discourage its employees from participating in any decision in which they may be unable to maintain professional objectivity due to conflicts of interest.
- Engage only in fair and open competition, by treating competitors, suppliers, customers, and colleagues with integrity.
- Encourage its employees to maintain the confidentiality of information entrusted to them, except when disclosure is authorized by the MD or required by laws or regulations as contained in the Freedom of Information Act 2011 Laws of the Federation of Nigeria.
- Corporate/ promotional gifts and hospitality on acceptance by staff & Management valued N20, 000 and above must be declared through the HOD/MD. No gifts should be negotiated.
- OOPC do not make Political contributions of any form whilst carrying out its business operations with individuals, government agencies, NGOs, etc.
- OOPC will give charitable donations and sponsorships in line with its Procedure GP35 Corporate Social Responsibility
- OOPC do not comply any form of unethical conduct such as charging fees to workers, recovering cost of recruitment and transportation against workers' wages, receiving cash gifts and commissions from labour intermediaries, contractors, suppliers or other interested parties, as it respects fair conduct of business.
- Employees receive salary in accordance with Nigerian minimum wage when they are not absent from work without permission.
- We protect company's property, including intellectual property within our care.
- In resolving conflicts, OOPC will avoid escalation of conflicts and prohibiting the usage of dogs and paramilitary in the organization.
- Communicated to all persons working for or on behalf of OOPC (as per OOPC communication procedure GP10) and enforce its strict compliance.
- The policy will be monitored for compliance and implementation by implementing OOPC's Whistleblowing policy.

The HSE Manager shall implement, monitor and document the provisions of this code.

The Managing Director confirms the commitment and support, along with that of all stakeholders, employees and those working on behalf of the company, to the above policy statement and the effective application and continual compliance with this code of ethics.

5.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	2 JUL 2026

