

Okomu Action Plan

November 2024 update



OKOMU – ACTION PLAN – NOVEMBER 2024 UPDATE

ALLEGATIONS	ACTIONS	TIMEFRAME	CURRENT STATUS
1. Forced eviction/ burning of houses	To have quarterly meetings with communities to discuss all issues including security.	Already in place	Done
	To engage Partnership Initiative for Niger Delta (PIND) to participate to dialogue platforms with Okomu, communities and security agencies.	December 2024	Initiated through MoU
2. Issues of intimidation using of soldiers/police/military forces: mistreatment by security forces on the plantation, beatings and harassment	To have joint meetings between the company security personnel and community policing personnel and to have community policing through the ESSN policing model of Edo State incorporated into the company's security portfolio.	Already in place	Done
	To have a whistleblower policy that protects the identity of all whistleblowers through an independent whistleblower communication system.	Already in place	Done
	To organize regular training of company security personnel on human rights and ethics.	Already in place	Done
	To have quarterly meetings between Okomu security and communities with Nigerian Security forces invited on an ad hoc basis.	Already in place	Done
	To organize community stakeholder engagement for full understanding of boundaries and protected areas.	Already in place	Done

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<p>3. Access blocked to roads. Access blocked to houses with big trenches</p> <p>11/2024</p>	To install warning signs for trenches.	December 2024	Done
	Regularly monitor and maintain the condition of trenches and roads to ensure accessibility and safety.	Already in place	Done
	Identify, establish and maintain alternative routes that can be used when primary access roads are blocked.	Already in place	Done
	Grade alternative route in AT&P community and complete culvert. Investigate and address the issue of erosion.	Already in place/2025 (culvert)	Ongoing for grading/To start for culvert in 2025 Erosion issues concluded
	Closing time of the gates to be in line with security constraints.	Already in place	Done
	Ensure that security agents do not demand/request money from people who pass through the plantation. The whistleblowing policy to be communicated to users of internal roads through community meetings. Security agents will be educated through ongoing toolbox talks and training on ethics and good conduct & human rights. Signboards to be erected at entry points informing people not to give bribes.	Already in place	Done
	Put in measures to remove restrictions at the gate during emergencies (such as medical emergencies) to allow communities access through the plantation.	Already in place	Done
	Train security officers on human rights, conflict resolution and community health and safety.	Already in place	Done

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4. Actions related to EF recommendations for unfounded allegations	To Implement community-based conflict resolution programs to address disputes and grievances before they escalate to legal action.	2025	To start/Part of the MoU with PIND
	To encourage individuals to come forward to report cases without fear of retaliation. To re-sensitize communities on Grievance Mechanism.	Already in place	Done
	To form community watch committees that collaborate with local law enforcement to monitor and report on security-related issues (done under the Edo State Government ESSN initiative with communities and Okomu).	Already in place	Done
	For new activities with potential community impacts, to widen the scope of discussions with community members to include women and youth representatives.	Already in place	Done
	To develop a documentary on Okomu operations, host communities and CSR projects to improve the public image of Okomu and sensitize communities on company operations.	July 2024	Done
	To improve transparency and communication about CSR project selection and implementation by having pre-CSR project meetings between Okomu and communities and having project monitoring committees put in place in all the communities.	Already in place	Done

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4. Actions related to EF recommendations for unfounded allegations	To conduct regular impact assessments over a 5 years period to evaluate the effectiveness and outcomes of CSR projects.	2029 to review 2024 CSR projects	To start
	Once they have resolved their internal factions' disagreements, to engage riverine communities to resolve grievances and meet some of their community needs.	Once internal communities' conflicts are resolve	To start

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