

Okomu Action Plan

UPDATE JANUARY 2026



OKOMU – ACTION PLAN – JANUARY 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			TIMEFRAME		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW	REASON FOR DELAY
Forced eviction/ burning of houses	Not determined	To have quarterly meetings with communities to discuss all issues including security.	Continuous	1. Quarterly meetings with communities have been implemented to discuss all issues including security.	1. Continuous engagement with communities based on an annual agenda mutually agreed.	Already in place	Continuous	/
		To engage PIND* to participate to dialogue platforms with Okomu, communities and security agencies.	Done	1. PIND has been engaged to participate to dialogue platforms with Okomu, communities and security agencies.	1. Continuous engagement and partnership to promote dialogue with Okomu, communities and security agencies.	Dec. 2024	/	/

* PIND: Partnership Initiative for Niger Delta

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Issues of intimidation using of soldiers/ police/ military forces: mistreatment by security forces on the plantation, beatings and harassment	Partially Founded	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.	Done	1. Joint meetings between the Company security personnel and community policing personnel have been organized. 2. Community policing through the ESSN policing model of Edo State have been created and incorporated into the Company's security portfolio.	1. Continuous engagement between the Company security personnel and community policing personnel.	Already in place	/	/
		To have a whistleblower policy that protects the identity of all whistleblowers through an independent whistleblower communication system.	Continuous	1. Okomu has developed a whistleblower policy that protects the identity of all whistleblowers through an independent whistleblower communication system.	1. Ongoing sensitization and pictorial communication on the whistleblower policy.	Dec. 2024	Continuous	/

* ESSN: Edo State Security Network

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Issues of intimidation using of soldiers/ police/ military forces: mistreatment by security forces on the plantation, beatings and harassment	Partially Founded	To organize regular training of Company security personnel on human rights and ethics.	Continuous	1. Regular training of Company security personnel on human rights and ethics have been organized.	1. Ongoing sensitization and pictorial communication on the human rights and code of ethic.	Already in place	Continuous	/
		To have quarterly meetings between Okomu security and communities with Nigerian Security forces invited on an ad hoc basis.	Continuous	1. Nigerian Security forces have been invited to meetings organized between Okomu security and communities.	1. Establishment of a mutually agreed quarterly agenda for these meetings. 2. Continuous respect to the quarterly meeting agenda.	Already in place	Continuous	/
		To organize community stakeholder engagement for full understanding of boundaries and protected areas.	Continuous	1. Okomu organizes community stakeholder engagement to discuss and sensitize about protected areas (sacred sites, HVC* threats, wildlife, localisation...).	1. Continuous engagement to promote dialogue with Okomu and the communities on HCV and protected areas.	Already in place	Continuous	/

* HCV: High Conservation Value

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Access blocked to roads Access blocked to houses with big trenches	Partially Founded	To install warning signs for trenches.	Done	1. Warning signs for trenches have been installed.	1. Maintenance of the warning signs. 2. Sensitization to the communities on the trenches locations.	Dec. 2024	/	/
		Regularly monitor and maintain the condition of trenches and roads to ensure accessibility and safety.	Continuous	1. Establishment of the "SOP* Trench Maintenance" (SOP-TM-001) describing the process for maintenance of trench. 2. Monitoring and maintainance of the condition of trenches and roads is ongoing to ensure accessibility and safety. 3. Discussion on trench maintenance is included in monthly meetings between Security and Plantation Departments.	1. Continuous maintenance of the warning signs for trenches.	Already in place	Continuous	/

* SOP: Standard Operating Procedure

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Access blocked to roads Access blocked to houses with big trenches	Partially Founded	Identify, establish and maintain alternative routes that can be used when primary access roads are blocked.	Done	1. Okomu has identified, established and maintained alternative routes that can be used when primary access roads are blocked.	1. Continuous maintenance of alternative routes.	Already in place	/	/
		Grade alternative route in AT&P community and complete culvert. Investigate and address the issue of erosion.	Done	1. Alternative route in AT&P community have been graded with completion of culverts. 2. Issue of erosion have been investigated and addressed through a grading plan. 3. Grading was carried out.	1. Continuous maintenance of alternative routes.	Already in place/ 2025 (culverts)	/	/
		Closing time of the gates to be in line with security constraints.	Done	1. Okomu has aligned closing time of the gates with security constraints.	1. Continuous implementation and respect to the new procedure.	Already in place	/	/

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<p>Access blocked to roads</p> <p>Access blocked to houses with big trenches</p>	Partially Founded	<p>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.</p>	Done	<ol style="list-style-type: none"> 1. Okomu has developed a whistleblower policy that ensures that security agents do not request money at the gates. 2. Communication of the policy to users of internal roads through community meetings is ongoing. 3. Trainings to security agents on whistleblowing policy have been conducted through ongoing toolbox talks. 4. Trainings have been conducted on ethics, good conduct and human rights. 5. Signboards have been erected at entry points informing people not to give bribes. 	<ol style="list-style-type: none"> 1. Annual training plan update with integration of security agents and topics on ethics, whistleblower policy, human rights and good conduct. 	Already in place	/	/

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Access blocked to roads Access blocked to houses with big trenches	Partially Founded	Put in place measures to remove restrictions at the gate during emergencies (such as medical emergencies) to allow communities access through the plantation.	Done	<ol style="list-style-type: none"> Measures have been put in place to remove restrictions at the gate during emergencies to allow communities access through the plantation. Signboards with emergency contacts displayed at the gates. 	<ol style="list-style-type: none"> Continuous implementation and respect to the new procedure. 	Already in place	/	/
		Train Security Officers on human rights, conflict resolution and community health and safety.		Done	<ol style="list-style-type: none"> Trainings have been conducted to security officers on human rights, conflict resolution and community health and safety. Quarterly assessment conducted for communities with questionnaires on security operations. Presence of camera at all main entrances to verify compliance with security ethics. 	<ol style="list-style-type: none"> Annual training plan update with integration of security agents and topics on human rights, conflict resolution and community health and safety. 	Already in place	/

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Actions related to EF recommendations for unfounded allegations	Unfounded	To implement community-based conflict resolution programs to address disputes and grievances before they escalate to legal action.	Continuous	<ol style="list-style-type: none"> Community-based conflict resolution programs have been put in place to address disputes and grievances before they escalate to legal action. Gender committee sensitizations. Establishment of annual training plan that include training on gender subjects. 	<ol style="list-style-type: none"> Continuous implementation of the procedure. 	2025	Continuous	/
		To encourage individuals to come forward to report cases without fear of retaliation. To re-sensitize communities on grievance mechanism.		Continuous	<ol style="list-style-type: none"> Communication has been made to encourage individuals to come forward to report cases without fear of retaliation. Training sessions have been conducted to communities on grievance mechanism. 	<ol style="list-style-type: none"> Definition of a stakeholder engagement strategy comprising a mutually agreed planning of meetings with communities, a clear agenda that covers grievance mechanism, no retaliation, human rights, code of ethic. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan". 	Already in place	Continuous

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Actions related to EF recommendations for unfounded allegations	Unfounded	To form Community Working 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).	Done	<ol style="list-style-type: none"> Community Working Committees have been created. These committees have signed ToR* to describe their missions of collaboration with local law enforcement to monitor and report on security-related issues (done under the Edo State Government ESSN initiative with communities and Okomu). 	<ol style="list-style-type: none"> Monitoring of the reports of the Community Working Committees with action plans. 	Already in place	/	/
		For new activities with potential community impacts, to widen the scope of discussions with community members to include women and youth representatives.	Continuous	<ol style="list-style-type: none"> Okomu has widened the scope of discussions with community members to include women and youth representatives for new activities with potential community impacts. 	<ol style="list-style-type: none"> Definition of a stakeholder engagement strategy describing the list of stakeholders and scope of discussion for activities with community impacts. 	Already in place	Continuous	/

* ToR: Terms of Reference

* Community Working Committees: Community Watch Committees according to the report

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Actions related to EF recommendations for unfounded allegations	Unfounded	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.	Done	<ol style="list-style-type: none"> Okomu has developed a documentary on its operations, host communities and CSR projects to improve the public image of the Company. Sensitization programs have been conducted to communities on Company operations. Communication Strategy to increase positive image. 	<ol style="list-style-type: none"> Definition of a stakeholder engagement strategy describing the community development action plan, CSR projects and communication strategy. 	Jul. 2024	/	/

* CSR: Corporate Social Responsibility

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Actions related to EF recommendations for unfounded allegations	Unfounded	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.	Done	<ol style="list-style-type: none"> 1. Transparency and communication about CSR project selection and implementation have been improved. 2. Pre-CSR project meetings between Okomu and communities have been established with monitoring committees in all the communities. 	<ol style="list-style-type: none"> 1. Definition of a stakeholder engagement strategy describing the community development action plan, CSR projects and communication strategy. 	Already in place	/	/
		To conduct regular impact assessments over a 5 years period to evaluate the effectiveness and outcomes of CSR projects.	Continuous	<ol style="list-style-type: none"> 1. Impact assessments over a 5 years period has been planned to evaluate the effectiveness and outcomes of CSR projects. 2. Community meetings on needs addressed. 	<ol style="list-style-type: none"> 1. Definition of a stakeholder engagement strategy describing the community development action plan, CSR projects and communication strategy. 	2029 to review 2024 CSR projects	Continuous	/

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Actions related to EF recommendations for unfounded allegations	Unfounded	Once they have resolved their internal factions disagreements, to engage riverine communities to resolve grievances and meet some of their community needs.	Continuous	<ol style="list-style-type: none"> 1. Riverine communities have been engaged to resolve grievances and meet some of their community needs. 2. Implementation of Ulula. 	<ol style="list-style-type: none"> 1. Continuous implementation of grievance mechanism procedure. 	Once internal communities' conflicts are resolved	Continuous	/

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