

Evaluation of implementation of “Deep dive” action plan by Okomu Oil Palm Company PLC (OOPC)

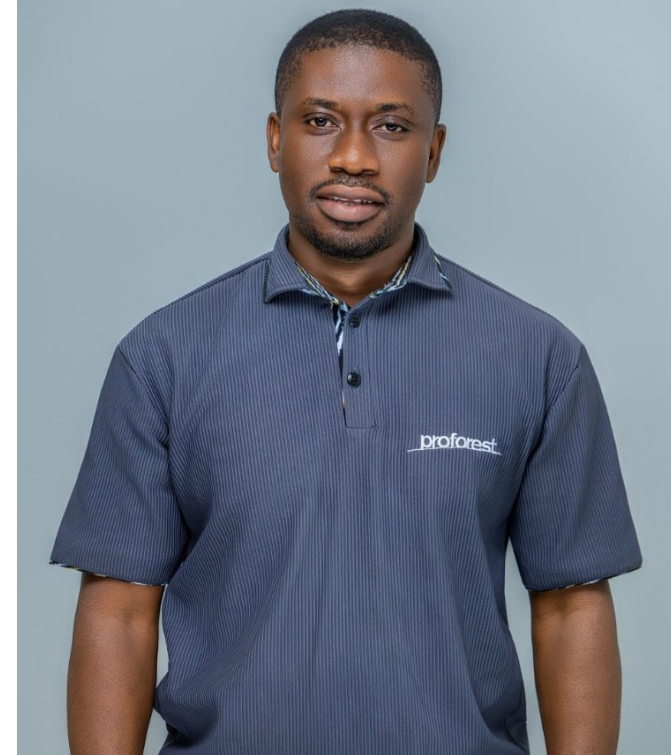
Closing meeting – 27 February 2026



PROFOREST – ASSESSMENT TEAM



Stephen Doso Jnr.
Team Leader



Kwadwo Nti Baniako
Team Member



OVERVIEW & ASSESSMENT PROCESS

OVERVIEW

Objective

- Verify measures implemented by Okomu to address allegations and if they are in line with recommendations made by Earthworm Foundation (EF)*.
- Provide any recommendations for improvement.

Scope

- Okomu's operations.
- EF's investigation of allegations against Okomu.
- Actions and measures in Okomu action plan (updated January 2026).

* EF: Earthworm Foundation

ASSESSMENT PROCESS

- Development of checklist of follow up information.
- Consultations/interviews.
- Field visits and observations.
- Document review.
- Analysis and reporting.



FIELD WORKPLAN

Date	Activity
Mon 23 Feb 2026	• Proforest team arrived at Okomu.
Tue 24 Feb 2026	• Opening meeting with management and key staff. • Document review. • Interviews/meetings with HSE* team, Communications team, Operations Manager for Casiota and security personnel. • Site visits (trenches and management quarters security gate).
Wed 25 Feb	• Interviews with Compliance Officer for MU* Logistics, security personnel. • Consultations with AT&P community. • Site visits (Mirror Gate, AT&P, trenches).
Thu 26 February	• Virtual meeting with PIND. • Interviews/meetings with HSE team, security personnel. • Consultations with local communities (Gbelebu and Madabgayo representatives). • Site visits (Papa Tango 1 and Indian Tango 1 security gates).
Fri 27 Feb 2026	• Preparation for closing meeting. • Closing meeting.
Sat 28 Feb 2026	• Proforest team departs.

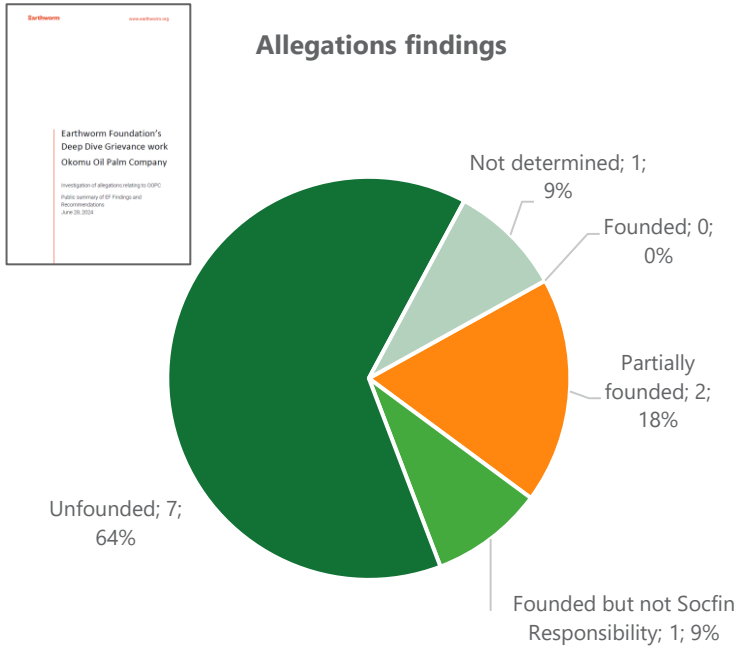
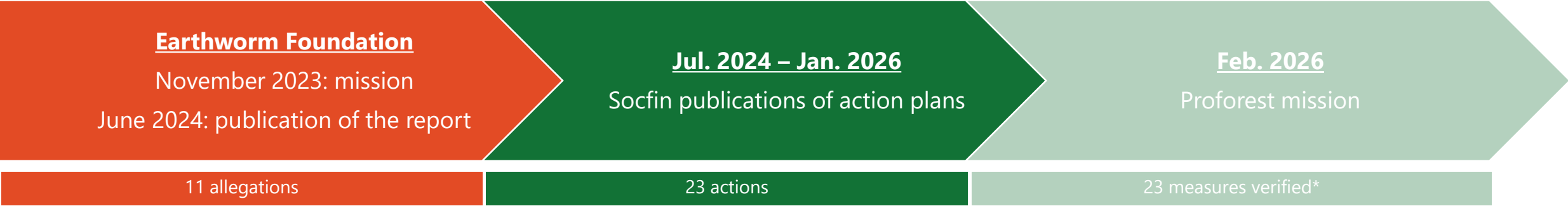
CONTEXT OF DEED DIVE INVESTIGATION



- From 2023 to the end of 2025, Socfin Group mandated Earthworm Foundation (EF*) to conduct independent investigations, including field missions, to verify allegations raised by NGOs.
- Following each mission, EF published an investigation report outlining its findings and recommendations on its website.
- Based on these reports, Socfin developed action plans to address each identified issue. These action plans were updated on a quarterly basis and made publicly available on the Socfin website.
- In January 2026, Socfin partnered with Proforest to independently verify, through field visits, the alignment and implementation of the actions set out in these action plans, providing an additional independent external perspective.

* EF: Earthworm Foundation

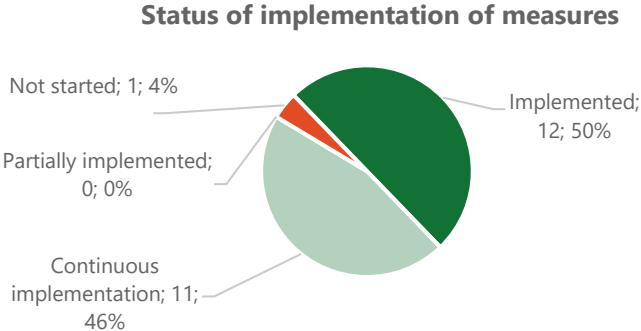
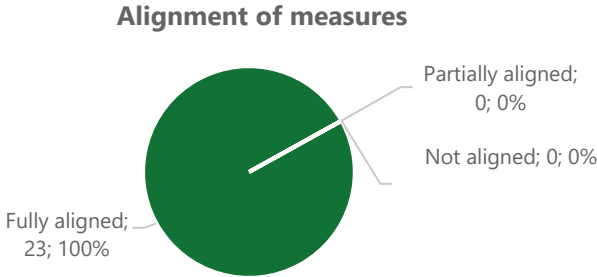
OKOMU – KEY ELEMENTS



- #1: July 2024
- #2: November 2024
- #3: February 2025
- #4: June 2025 → **closing of all the actions**
- #5: January 2026

OKOMU – ACTION PLAN – JANUARY 2026							
ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION		TIMEFRAME		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	INITIAL	NEW
Forced eviction/ burning of houses	Not determined	To have quarterly meetings with communities to discuss all issues including security. To engage PIND to participate to dialogue platforms with Okomu communities and security agencies.	Continue	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	Continue
			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



Verification of measures implemented

 **Implemented:** Reported measure is confirmed to be fully implemented.

 **Partially implemented:** Reported measure has been partially or fully implemented but does not fully address issue.

 **Continuous implementation:** Reported measure is still being implemented.

 **Not started:** Reported measure is planned, but yet to be implemented.

Alignment implemented measures with EF recommended actions

 **Fully aligned**

 **Partially aligned**

 **Not aligned**

OKOMU – PROFOREST VERIFICATION – FEBRUARY 2026

ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
						ALIGNMENT	STATUS	
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.	Fully aligned	Continuous implementation	
		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.	Fully aligned	Implemented	

* PIND: Partnership Initiative for Niger Delta

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ALLEGATIONS		ACTIONS	STATUS & IMPLEMENTATION			PROFOREST VERIFICATION		
TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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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.	Fully aligned	Implemented	
		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.	Fully aligned	Continuous implementation	Contact numbers on whistleblower signboard at mirror gate are faded and not legible.

* 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.	Fully aligned	Continuous implementation	
		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.	Fully aligned	Continuous implementation	
		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, localization...).	1. Continuous engagement to promote dialogue with Okomu and the communities on HCV and protected areas.	Fully aligned	Continuous implementation	

* 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.	Fully aligned	Implemented	Some warning signs for trenches broken/ damaged between mirror gate and AT&P community. Enhance inspection and maintenance of warning signs and other signposts.
		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 maintenance 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.	Fully aligned	Continuous implementation	

* SOP: Standard Operating Procedure

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Access blocked to roads	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.	Fully aligned	Implemented	
Access blocked to houses with big trenches								

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Access blocked to roads Access blocked to houses with big trenches	Partially Founded	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.	1. Continuous maintenance of alternative routes.	Fully aligned	Implemented	Alternative route areas were identified; however, the community requires permission from private owner. Following the Proforest visit, the Maroghionda Community sent a letter to Okomu indicating that, after prolonged negotiations with the landowner, they had decided to continue using the existing road and discontinue further discussions regarding an alternative route. As a result, Okomu should revise the implemented measure to reflect the action taken.
				2. Issue of erosion have been investigated and addressed through a grading plan.				Specific road with erosion issue addressed through drainage (culverts).
				3. Grading was carried out.				Okomu submitted photos, videos and appreciation letters from the AT&P community on completed grading works on the boundary road.

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Access blocked to roads	Partially Founded	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.	Fully aligned	Implemented	
Access blocked to houses with big trenches								

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Access blocked to roads Access blocked to houses with big trenches	Partially Founded	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.	Done	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.	1. Annual training plan update with integration of security agents and topics on ethics, whistleblower policy, human rights and good conduct.	Fully aligned	Implemented	

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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	1. Measures have been put in place to remove restrictions at the gate during emergencies to allow communities access through the plantation. 2. Signboards with emergency contacts displayed at the gates.	1. Continuous implementation and respect to the new procedure.	Fully aligned	Implemented	
		Train Security Officers on human rights, conflict resolution and community health and safety.	Done	1. Trainings have been conducted to security officers on human rights, conflict resolution and community health and safety. 2. Quarterly assessment conducted for communities with questionnaires on security operations. 3. Presence of camera at all main entrances to verify compliance with security ethics.	1. Annual training plan update with integration of security agents and topics on human rights, conflict resolution and community health and safety.	Fully aligned	Implemented	

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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	1. Community-based conflict resolution programs have been put in place to address disputes and grievances before they escalate to legal action. 2. Gender committee sensitizations. 3. Establishment of annual training plan that include training on gender subjects.	1. Continuous implementation of the procedure.	Fully aligned	Continuous implementation	
		To encourage individuals to come forward to report cases without fear of retaliation. To re-sensitize communities on grievance mechanism.	Continuous	1. Communication has been made to encourage individuals to come forward to report cases without fear of retaliation. 2. Training sessions have been conducted to communities on grievance mechanism.	1. 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. 2. Commitment and implementation of the "Socfin Group Sexual Harassment and Violence Action Plan".	Fully aligned	Continuous implementation	

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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	1. Community Working Committees have been created. 2. 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).	1. Monitoring of the reports of the Community Working Committees with action plans.	Fully aligned	Implemented	
		For new activities with potential community impacts, to widen the scope of discussions with community members to include women and youth representatives.	Continuous	1. Okomu has widened the scope of discussions with community members to include women and youth representatives for new activities with potential community impacts.	1. Definition of a stakeholder engagement strategy describing the list of stakeholders and scope of discussion for activities with community impacts.	Fully aligned	Continuous implementation	

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

* *ToR: Terms of Reference

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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	1. Okomu has developed a documentary on its operations, host communities and CSR projects to improve the public image of the Company. 2. Sensitization programs have been conducted to communities on Company operations. 3. Communication Strategy to increase positive image.	1. Definition of a stakeholder engagement strategy describing the community development action plan, CSR projects and communication strategy.	Fully aligned	Implemented	

* CSR: Corporate Social Responsibility

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TOPIC	FINDING		STATUS	MEASURES IMPLEMENTED	LONG TERM STRATEGY	MEASURES		RECOMMENDATIONS
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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	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.	1. Definition of a stakeholder engagement strategy describing the community development action plan, CSR projects and communication strategy.	Fully aligned	Implemented	
		To conduct regular impact assessments over a 5 years period to evaluate the effectiveness and outcomes of CSR projects.	Continuous	1. Impact assessments over a 5-years period has been planned to evaluate the effectiveness and outcomes of CSR projects.	1. Definition of a stakeholder engagement strategy describing the community development action plan, CSR projects and communication strategy.	Fully aligned	Not started	First CSR impact assessment to be carried out in 2029
				2. Community meetings on needs addressed.			Continuous implementation	

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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	1. Riverine communities have been engaged to resolve grievances and meet some of their community needs.	1. Continuous implementation of grievance mechanism procedure.	Fully aligned	Continuous implementation	
				2. Implementation of Ulula.				The Ulula platform has been implemented in three subsidiaries. The testing phase has started in Okomu, with the official launch of the platform planned for June 2026.

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