



WILMAR INTERNATIONAL LIMITED
(Incorporated in the Republic of Singapore)
(Company Registration No.: 199904785Z)

RESPONSE TO SGX REGCO'S QUERIES

Wilmar International Limited (the “**Company**” or “**Wilmar**”) refers to the queries raised by the Singapore Exchange Regulation (“**SGX RegCo**”) on 28 October 2026 in relation to forest and peatland fires in Indonesia and the resulting transboundary haze, and wishes to provide its response as follows:

SGX RegCo's Query 1

The Company stated that it has implemented a strict No Burning Policy across all its operations since 2006, which applies to its subsidiaries and third-party suppliers. The Company further stated that non-compliance by suppliers may result in termination of commercial relationships. Please clarify the procedures and processes in place to monitor the effectiveness of and compliance with the No Burning Policy across the Group's subsidiaries and suppliers.

Company's Response

Wilmar maintains a strict No Burning Policy since 2006 for our oil palm plantations, which prohibits the use of fire for land preparation – including new planting, replanting or other development activities. Mechanical methods are used for land preparation and development instead of burning. This requirement then forms part of Wilmar's broader No Deforestation, No Peat and No Exploitation (NDPE) policy, which applies to the Group's own operations and third-party suppliers and has been operative since December 2013.

Wilmar has not undertaken new oil palm plantings in Wilmar-owned plantations in Indonesia since 2013. Additionally, compliance with the No Burning Policy across the Group's plantation operations in Indonesia is supported by a combination of satellite monitoring, ground verification, incident response, and management oversight – establishing a multi-layered compliance framework across the Group's operations. Further details are provided below:

- **Fire Risk Mapping and Prevention:** Wilmar maps fire risks of its concessions and surrounding areas to support more targeted monitoring and preparedness, particularly in higher risk areas.
- **Monitoring and Early Detection:** Wilmar operates a 24/7 integrated fire monitoring system of all its concessions and a 5km buffer zone beyond its boundaries surrounding the concessions. As an early-warning mechanism, the system automatically captures hotspots and sends alerts to a central dashboard as well as to field managers – thus, enabling field personnel to investigate reported incidents and respond promptly.
- **Ground Verification:** Field personnel conduct daily patrolling, with frequency increasing in tandem with the heightened risk of fires. Satellite hotspot alerts are also followed by on-the-ground verification to determine if there are actual fires – as hotspots may indicate a sudden increase or fluctuation in temperature but do not necessarily establish that fires or burning have occurred.
- **Rapid Response:** Wilmar's concessions are well equipped with firefighting equipment, and supported by on-site fire response teams that are dispatched to contain and extinguish fires as rapidly as possible. The firefighting teams are trained and assessed regularly for this purpose.
- **Reporting and Investigation:** Fire incidents within Wilmar's concessions are recorded, investigated and reported daily to management through the Group's internal reporting processes –

capturing the location of the fire, point of origin, area affected and response taken. A police report is also lodged for each fire incident occurring within Wilmar's concessions.

- **External Monitoring and Verification:** Wilmar's own monitoring is complemented by external mechanisms, including the Roundtable On Sustainable Palm Oil (RSPO) Hotspot Hub. The Group shares fire data and verified hotspot alerts with the RSPO, which requires its members to investigate hotspots detected and report actions taken when fires are confirmed – providing an additional layer of transparency and accountability.
- **Governance and Oversight:** Fire incidents and compliance are subject to management oversight through reporting to the Company's Board Sustainability Committee and the Sustainability Management Team. Material or critical concerns are further escalated to the Board for attention.
- **Review of Effectiveness:** Each estate submits quarterly reports covering hotspots and fire incidents within its concession and the 5km buffer zone, the area affected, firefighting personnel and equipment, and fire-prevention programmes with surrounding communities. Firefighting operations and post-fire handling are evaluated after each incident, and fire risk maps and fire prevention action plans are updated annually.
- **Multi-stakeholder Engagement and Collaboration:** Wilmar engages closely with community leaders, local governments and authorities to raise awareness on fire prevention at grassroot levels. Communities are also provided with basic firefighting equipment and training.

Third-Party Suppliers

Wilmar's No Burning Policy is embedded within the Group's NDPE policy, which applies throughout its supply chain and proactively monitored through Wilmar's Supplier Group Compliance Programme which covers approximately 24.4 million hectares across Malaysia, Indonesia, Papua New Guinea and other palm-producing countries.

Identified fire alerts, or other indication of potential non-compliance with Wilmar's NDPE policy, will be subject to further investigation and verification. Indication that fire may have been deliberately used for land preparation, land clearing or development, will trigger the Group's grievance mechanism, followed by appropriate corrective action being determined based on the findings of the case. Non-compliance of Wilmar's NDPE policy by suppliers may also result in termination of commercial relationships.

SGX RegCo's Query 2

Please state whether the Group's No Burning Policy and its fire prevention and management framework are subject to any independent or external verification, audit or assurance. If so, please provide the details of such verification, audit and assurance, and the key findings from the latest verification.

Company's Response

The Group's No Burning Policy and its fire prevention and management framework in Indonesia are subject to external checks and verification as follows:

- **Government inspections:** Fire prevention and firefighting readiness are a mandatory legal requirement in Indonesia. Under Indonesian regulations, including Minister of Agriculture Regulation No. 5 of 2018 (as amended by Regulation No. 6 of 2025) and Minister of Environment and Forestry Regulation No. P.32 of 2016, plantation companies must open and manage land without burning and must maintain fire control systems, facilities and infrastructure, including trained firefighting teams, firefighting equipment, early warning and detection systems, and standard operating procedures. Companies are also required to routinely report the status of their firefighting equipment and fire readiness to the relevant government authorities. Compliance with these requirements is checked through periodic and random inspections by the authorities.
- **RSPO certification:** Approximately 81% of the Group's planted area in Indonesia (159,755 hectares, across 19 mills and their supply bases) is certified under the Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria, which prohibit the use of fire for land preparation. The remaining planted area is covered by Wilmar's RSPO time-bound plan, under which the Group is committed to achieving RSPO certification for all its plantations by 2028. Progress against the plan is reported annually to RSPO. Compliance is audited annually by

independent, RSPO-accredited certification bodies through surveillance audits, with a full re-certification audit every five years. Public summaries of the audit reports are published on the RSPO website. RSPO Certified plantations is required to maintain rigorous fire management protocols and have measures in place to prevent and respond to fire risks and incidents in and around their plantations. RSPO Members are expected to respond to fires occurring within approximately two kilometres of their concession boundaries, but frequently respond well beyond this distance in support of neighbouring communities.

- **ISPO certification:** Indonesian Sustainable Palm Oil (ISPO) certification is mandatory for oil palm plantation companies in Indonesia. 25 of the Group's 34 plantation companies in Indonesia are ISPO-certified. The remaining nine companies are in the process of obtaining certification. The ISPO standard requires land to be cleared without burning, and compliance is audited by independent, accredited ISPO certification bodies annually.
- **RSPO hotspot monitoring:** RSPO independently monitors hotspots and potential fires within its members' concessions using satellite-based [Hotspot Hub and FireWatch](#) alert system. The Hotspot Hub features incident reports collected from the RSPO Firewatch System – a daily hotspot monitoring programme, detailing the actions taken on the ground by RSPO members to investigate and extinguish fires. The Group's verification of, and response to, each hotspot are reported to and visible to the RSPO, as described under Query 1.
- **Latest findings:** The most recent RSPO surveillance audits of the Group's operations in Indonesia, conducted either in 2025 or 2026, did not raise any non-conformity relating to the use of fire or to land preparation, which would be raised as a major non-conformity.

SGX RegCo's Query 3

On 16 October 2026 and 19 October 2026, the National Environment Agency of Singapore ("NEA") issued Preventive Measure Notices to 10 companies under the Transboundary Haze Pollution Act 2014 (listed below). Please confirm whether these 10 companies named by NEA are subsidiaries or entities with which the Group has any material operational, supply-chain or business relationship:

- PT Bumi Andalas Permai
- PT Bumi Mekar Hijau
- PT Paramitra Mulia Langgeng
- PT Sumatera Alam Anugerah
- PT SBA Wood Industries
- PT Hutan Lestari Raya
- PT Bangkanea
- PT Buana Megatama Jaya
- PT Mananjung Hayak
- PT Baratama Putra Perkasa

Company's Response

Wilmar confirms that the Group does not have any operational, supply-chain, or business relationship with any of the ten companies, based on a review of the Group's corporate records, supplier and traceability data and counterparty records across all our Singapore and Indonesian entities.

SGX RegCo's Query 4

Please provide the Board's assessment on whether the fires as well as the transboundary haze have resulted, or are expected to result in, any material operational, financial, legal, regulatory or reputational impact on the Group. Please also elaborate on the basis for the assessment.

Company's Response

The Board has reviewed the information presently available and, based on that information, assesses that the fires and transboundary haze have neither resulted in nor is presently expected to result in any material operational, financial, legal or regulatory impact on the Group. The Board acknowledges the heightened public, regulatory and stakeholder scrutiny of the Group, and addresses its reputational impact as set out below.

- **Operational:** There has been no disruption to the Group's plantation or mill operations or production.
- **Financial:** Based on current estimates, the loss of crop and bearer plants is expected to be below US\$0.5 million – with most of the affected oil palms expected to recover. The current estimates reflect estimated yield loss on affected blocks during recovery and write-off of bearer plants. Accordingly, the estimated financial impact is not material in the context of Wilmar's overall financial position and results.
- **Legal and Regulatory:** On 23 October 2026, Wilmar received a Notice to provide Documents and Information under section 10(1) of the Transboundary Haze Pollution Act 2014 from NEA. There is also ongoing preliminary police investigation in respect of fire incidents in plantations belonging to Wilmar subsidiaries, as detailed in our response to Query 5. Other than the NEA Notice and ongoing investigations mentioned above, the Group has not received any notice of violation, administrative sanction or permit-related action in connection with the fires. The Wilmar Group will continue to provide the authorities with its full cooperation.
- **Reputational:** The fires and transboundary haze have resulted in heightened public, regulatory and stakeholder scrutiny of companies operating in Indonesia, including Wilmar. Based on information currently available, the Board does not presently expect the situation to have a material reputational impact on the Group. The Group continues to engage relevant stakeholders transparently through its disclosures while continuing to provide full cooperation to the authorities.

The Board will continue to monitor developments, including the ongoing investigations and regulatory developments in Singapore and Indonesia. The Group will also make further announcements, when required, should there be any material updates.

SGX RegCo's Query 5

Please confirm whether the Group has received queries or is subject to any investigation by any authorities or agencies in Singapore, Indonesia or elsewhere, in relation to the recent and ongoing fire and transboundary haze situation. If yes, please identify and name the authority or agency, as well as the scope of the query or investigation.

Company's Response

Indonesia

Preliminary investigations are ongoing by the Indonesian police on fire incidents reported by Wilmar to the police in respect of approximately 28 hectares of burned areas in plantations owned by our subsidiaries in West Kalimantan. Wilmar is providing full cooperation to the authorities for these investigations.

Based on the Group's investigations, the fires in the affected areas mentioned above were assessed as either having originated outside the relevant concession boundaries or as having originated in non-planted areas, comprising community-farmed land and conservation areas under the Group's management.

The Group's investigations found no evidence linking any of the affected areas to land preparation, land clearing, replanting or other plantation-related development activities undertaken by Wilmar.

Singapore

Other than this set of queries received from SGX RegCo and the Notice for production of documents and information from NEA, no Group entity has received any query or notice from any other Singapore authority in relation to the fires and transboundary haze.

As announced on 23 October 2026, Wilmar will comply with the NEA Notice. Work is in progress to gather the requested documents and information.

With respect to the NEA investigation, Wilmar will comply to engage a team of assessors as directed by NEA.

Save as disclosed above, the Group has not received any query from, and is not presently subject to any investigation by any authority or agency in Singapore, Indonesia or elsewhere in relation to the recent fires and transboundary haze.

ADDITIONAL INFORMATION

Full Cooperation with Local Authorities and Government Agencies

Wilmar is prepared to share its fire incident reports, hotspot chronology and burned-area maps with the NEA and other relevant authorities upon request, to facilitate independent verification of reported fire incidents against the Group's concession boundaries.

The Group also notes that the Indonesian authorities have intensified efforts to prevent and contain forest and land fires, including through ground and aerial firefighting operations, water bombing and weather modification operations across priority provinces, including South Sumatra, Central and West Kalimantan.

Investments in Firefighting Resources

Wilmar invests significantly in fire prevention, monitoring, preparedness and response – with substantial firefighting equipment and capabilities across its global plantation operations. Particularly in Indonesia, Wilmar has invested approximately IDR 80 billion, or US\$ 4.8 million in firefighting equipment and infrastructure, fire prevention, monitoring and firefighting initiatives since 2024.

In Indonesia, the Group maintains dedicated firefighting teams comprising approximately 1,300 trained personnel, supported by 291 fire engines and tank-mounted tractors, around 600 pumps (including 58 high-pressure units) and 147 fire watch towers as well as other specialised firefighting and monitoring tools, equipment and infrastructure strategically deployed across its operations.

These resources are supported by Wilmar's 24/7 integrated fire monitoring system, which monitors all its concessions in Indonesia and an additional 5km buffer zone beyond its concession boundaries. Hotspot alerts are automatically transmitted for ground verification and rapid response by field teams, who also undertake regular patrols. The frequency of these patrols and monitoring activities is intensified during periods of elevated fire risk. Firefighting personnel are also trained and assessed regularly throughout the year.

Beyond its own operational areas, Wilmar also works closely with local communities, government agencies and relevant authorities on awareness programmes, fire prevention and response. The Group also provides surrounding communities with basic firefighting equipment and training.

These investments reflect Wilmar's commitment to preventing fires which allows it to respond rapidly when incidents occur, thereby reducing risk to local communities and the environment.

Issued by
WILMAR INTERNATIONAL LIMITED
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