

## **No Deforestation, No Peat, No Exploitation (NDPE) Policy**

*(Updated February 2026)*

### ***Purpose:***

Wilmar International Limited (Wilmar)'s updated NDPE Policy (Policy) ([see previous version here](#)) reflects a proactive approach to align with key global sustainability frameworks, standards and initiatives as they evolve. This update reaffirms our compliance with applicable legal requirements in every jurisdiction where Wilmar operates, enhances supply chain transparency, maintains our industry leadership and responds to previous implementation challenges. We continue to collaborate with a broad coalition of stakeholders to advance the implementation of our sustainability commitments, including climate action, the protection of forests and peatlands, and the protection of human and community rights.

### ***Scope:***

The scope of this Policy covers:

- Wilmar's global operations, including refineries, mills and plantations that we own, manage or invest in, regardless of stake; our subsidiaries, partners (associates and joint-ventures), and
- Third-party suppliers (at group level)<sup>1</sup>

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<sup>1</sup> In 2019, Wilmar initiated consultations with external stakeholders to develop clear internal guidelines related to the definition of "group-level". In 2020, the Roundtable on Sustainable Palm Oil (RSPO) updated its definition of "[Group](#)", providing a clearer interpretation that addresses situations beyond the current corporate legal definition. Wilmar has adopted the updated definition since then. Further to that, national interpretations will be applicable in the respective regions.

## Principles:

The following principles remain at the core of our Policy:

No Deforestation	No New Development on Peatland	No Exploitation of People and Local Communities
<ul style="list-style-type: none"><li>No development on High Carbon Stock (HCS) forests and High Conservation Value (HCV) areas</li><li>No burning</li><li>Progressively reduce greenhouse gas (GHG) emissions</li></ul>	<ul style="list-style-type: none"><li>No new development on peatland, regardless of depth</li><li>Best management practices for existing plantations on peat</li><li>Where feasible, explore options for peat restoration by working with expert stakeholders and communities</li></ul>	<ul style="list-style-type: none"><li>Respect and support internationally recognised human rights</li><li>Respect and recognise the rights of all workers</li><li>Respect and protect the rights of children and their welfare</li><li>Support the inclusion of smallholders into the supply chain</li><li>Respect land tenure rights</li><li>Respect the rights of indigenous and local communities to give or withhold their Free, Prior and Informed Consent (FPIC) to operations on lands to which they hold legal, communal or customary rights</li><li>Identify measures to provide remediation where the company has caused or contributed to negative human rights impact</li></ul>

We are committed to upholding NDPE principles through structured, measurable actions guided by a robust due diligence framework. This includes comprehensive risk assessments, addressing identified impacts, evaluating the effectiveness of our interventions and transparently reporting outcomes. Where necessary, we also implement remediation measures, including recovery plans. These steps ensure our NDPE commitments are actively embedded across our operations and supply chain. Consistent with Wilmar's original NDPE Policy Statement, the cut-off date for supplier compliance to No Deforestation and No New Development on Peatland remains as 31 December 2015.

### 1. No Deforestation

- No Development on High Carbon Stock (HCS) forests and High Conservation Value (HCV) Areas**

Wilmar commits to the protection of forests, defined as HCS forests and HCV areas, in all estates within our global supply chain under the full scope of this Policy. We identify HCS forests and HCV areas for protection prior to any plantation development using international best practice guidance from the Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria, the HCV Network (HCVN), the High Carbon Stock Approach (HCSA) and the Accountability Framework initiative (AFI). The protection of biodiversity within identified HCS forests and HCV areas is expected as part of Wilmar's commitment to conservation.

The HCSA is a methodology that distinguishes protectable forest areas from low-carbon, low biodiversity degraded lands suitable for development. The HCSA methodology also includes consideration of indigenous and local peoples' lands and Free Prior Informed Consent (FPIC) of land

rights holders. All new assessments must be integrated *HCV-HCSA assessments*<sup>2</sup>, led by [Assessor Licensing Scheme](#) assessors and HCSA registered practitioners, and undergo necessary HCVN or HCSA quality review<sup>3</sup>.

- **No Burning**

Wilmar strictly prohibits the use of fire for land preparation, including new planting, replanting, or any other form of development. We do not tolerate any deliberate burning activities for land clearing by our suppliers.

- **Reducing Greenhouse Gas (GHG) Emissions**

For Wilmar's own operations, we will adopt and implement ambitious GHG emissions reduction targets, which will be achieved by initiatives such as adopting renewable energy, improving energy efficiency, reducing fugitive emissions, halting deforestation and implementing best management practices on cultivated peatland. We encourage our suppliers to adopt similar GHG emissions reductions measures within their operations.

Our no deforestation initiatives support the reduction of GHG emissions and national climate targets where we operate. We commit to annual reporting of our Scope 1, 2 and 3 emissions, reduction targets and progress using international standards.

## **2. No New Development on Peat<sup>4</sup>**

- **No New Development on Peatland Regardless of Depth**

Wilmar will not accept new development on peatland, regardless of the depth of peat, in accordance with the full scope of this Policy.

- **Best Management Practices for Existing Plantations on Peat**

Where plantations have been established on peat in the past, Wilmar will work with expert stakeholders to ensure that best management practices for peat, as defined by peat experts, are adopted.

- **Where Feasible, Explore Options for Peat Restoration by Working with Expert Stakeholders and Communities**

As oil palms planted on peat reach the end of their current rotation, and in line with the latest guidelines<sup>5</sup>, Wilmar will explore options for the long-term restoration of peatland and peat forest, where feasible.

## **3. No Exploitation of People and Local Communities**

Wilmar is committed to ensuring that the following principles apply to the rights of all people directly impacted by any operation covered under the full scope of this Policy. This includes people living locally in nearby or adjacent communities, and people working as employees and contractors, including temporary and migrant workers.

- **Respect and Support Internationally Recognised Human Rights**

We are committed to upholding and promoting internationally recognised human rights as outlined in the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic,

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<sup>2</sup> Standalone HCV or HCSA assessments may be acceptable in certain circumstances, provided they follow the HCSA toolkit (v2) and comply with HCSA or RSPO guidance when such assessments are allowed. See [here](#) for more info.

<sup>3</sup> Quality reviews are required for high-risk areas, identified using international best practice methodologies such as RSPO's [Land Use Risk Identification](#) tool.

<sup>4</sup> Wilmar follows [RSPO's peat definitions](#), with country specific definitions for Indonesia and Malaysia and the FAO Histosol definition for regions that do not have their own definition of peat.

<sup>5</sup> Country-specific requirements / guidelines, or RSPO guidelines.

Social and Cultural Rights as well as the core Conventions and Declarations of the International Labour Organization (ILO) on Fundamental Principles and Rights at Work<sup>6</sup>.

Our position on No Exploitation and our policies, action plans and mechanisms, is guided by the United Nations (UN) Guiding Principles on Business and Human Rights, which encompasses the three pillars of “Protect, Respect and Remedy”, as well as the promotion of human rights. We are also guided and informed by the UN Global Compact and the Food and Agriculture Organization’s Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the context of national food security (VGGTs). These provisions apply to all workers, contractors, indigenous people, local communities and anyone affected by our operations under the full scope of this Policy, as outlined in our [Human Rights Policy](#) and [Human Rights Due Diligence Framework](#).

- **Respect and Recognise the Rights of All Workers**

Wilmar respects the rights of all workers, covered under the full scope of this Policy, in line with local, national and ratified international laws. We also commit to ensuring the implementation of international best practices where legal frameworks are not yet in place, and use as reference:

- Free and Fair Labor in Palm Oil Production: Principles and Implementation Guidance<sup>7</sup>
- Other Wilmar policies that support our human rights values and commitments such as our Human Rights Due Diligence Framework, Human Rights Defenders Policy, Child Protection Policy, Health and Safety Policy, Equal Opportunity Policy, and Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy, Whistleblowing Policy and Women’s Charter

The following requirements are central to the successful implementation of this Policy:

- i. Elimination of forced, bonded (including debt bondage) or indentured labour, slavery and trafficking of persons, and restrictions on workers’ freedom of movement. Wilmar is committed to upholding the rights to freedom of movement and the right to resign from employment.
- ii. Upholding the rights of workers to freedom of association, collective bargaining and to form and join trade unions of their choice.
- iii. Ensuring ethical recruitment such that workers do not incur any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. Workers may voluntarily want to have their passports or identity documents held by the management for safekeeping purposes. In such cases, the workers shall always have access to the documents, which will be returned to the workers upon request. There should be evidence of due diligence in applying this to all contract workers and suppliers.
- iv. Providing a safe and healthy workplace, as outlined in our [Health and Safety Policy](#). Wilmar will work to protect workers, local communities and the environment from exposure to hazardous chemicals. Pesticides that are categorised as World Health Organization Class 1A or 1B and listed by the Stockholm or Rotterdam Conventions are not used, except in specific and urgent situations. The use of paraquat is strictly prohibited. We will work with stakeholders to determine and implement alternative pest control strategies to totally avoid these pesticides.
- v. Promote Diversity, Equity and Inclusion; and provide a working environment free from discrimination, harassment and abuse, as outlined in our [Women’s Charter](#), [Equal Opportunity Policy](#) and [Sexual Harassment, Violence and Abuse, Reproductive Rights Policy](#).
- vi. Commitment to best practices in terms of fair working conditions, including the payment of wages that meet or exceed legal requirements, taking into account reasonable production targets<sup>8</sup> and

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<sup>6</sup> [ILO fundamental Conventions and Declarations on Fundamental Principles and Rights at Work \(2022 update\)](#)

<sup>7</sup> [Free and Fair Labor in Palm Oil Production: Principles and Implementation Guidance](#)

<sup>8</sup> Identified and mutually agreed through a calibration process that involves workers, their representatives such as unions, and company management.

working hours. Other focus areas include workplace accident insurance, documented employment contracts, confidentiality, accommodation and access to remedy.

- ***Respect and Protect the Rights of Children and Their Welfare***

Wilmar does not tolerate child labour, any form of child exploitation and child abuse. We are committed to the elimination of such practices across our entire supply chain. Safeguarding the welfare of children and providing special care for their needs forms an integral part of this commitment, both within our own operations and across those of our third-party suppliers. These commitments are further detailed in our [Child Protection Policy](#).

- ***Support the Inclusion of Smallholders into the Supply Chain***

Wilmar is committed to supporting the inclusion of smallholders into our supply chain. Smallholders are a critical part of the industry, and they face unique challenges in meeting sustainability compliance, which could sideline them from the palm oil supply chain. These include lower levels of agronomic know-how, poorer access to resources and traceability limitations. Many smallholders may also have indigenous land rights, with explicit rights to develop their own land.

Wilmar conducts ongoing consultations with smallholders and provides technical assistance and support to help them achieve compliance with this Policy.

- ***Respect Land Tenure Rights***

Making reference to the UN [FAO Voluntary Guidelines on the Responsible Governance of Tenure \(VGGT\)](#), Wilmar respects indigenous peoples' and local communities' formal and customary rights to lands, territories and resources where proven in the context of our operational activities. This includes their right to own, occupy, use and administer these lands, territories and resources. This is done in cognisance of the national obligations, constitution, national and local laws and regulations of each country in which we operate in.

- ***Respect the Rights of Indigenous and Local Communities to Give or Withhold their Free, Prior and Informed Consent (FPIC) to Operations on Lands to Which They Hold Proven Legal, Communal or Customary Rights***

Wilmar pledges to respect and recognise the long-term formal and customary rights and individual rights of indigenous and local communities in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the HCSA Social Requirements. Wilmar commits to ensuring legal compliance as well as international best practices with respect to FPIC are implemented, in accordance with the full scope of this Policy, prior to commencing any new operations or activities. Wilmar will engage with local communities or relevant stakeholders to ensure FPIC processes are correctly implemented and continuously improved.

- ***Identify Measures to Provide Remediation Where the Company has Caused or Contributed to Negative Human Rights Impacts***

Wilmar-owned operations will cooperate with relevant stakeholders to identify situations where Wilmar has caused or contributed to negative human rights impacts, including those affecting indigenous and local communities' rights and labour rights. Upon identification, Wilmar will take appropriate measures to provide remediation for those affected.

#### **4. Complaints and Grievances**

- ***Resolve All Complaints and Conflicts through an Open, Transparent and Consultative Process***

Wilmar provides a [Grievance Procedure](#) to enable any stakeholder to raise a grievance against any party. All grievances logged under this Procedure shall be dealt with in a timely manner, and all investigations and findings will be reported transparently with full public disclosure. Suspension of a

supplier will be imposed at a group level; suspended suppliers must meet our re-entry criteria before we consider resuming business.

Wilmar also maintains a [Whistleblowing Policy](#), where internal and external stakeholders may, in confidence, raise concerns about possible corporate improprieties, and which also establishes a framework for independent investigations.

Wilmar supports the protection of environmental and human rights defenders and prohibits threats, harassment, intimidation, the use of violence, or retaliation against anyone who raises a concern, lodges a complaint or participates in an investigation or whistleblowing.

Finally, Wilmar maintains a clear and strong commitment to non-violence and will do whatever possible, in all contexts, to prevent the use of force or the threat or real application of violence.

## **5. Public Reporting and Stakeholder Engagement**

Wilmar values stakeholder input and is committed to proactive and constructive engagement with all stakeholders, including communities, governments, customers and civil society organisations at local, national and international levels. We uphold transparency by making information on our operational impacts publicly accessible in formats and languages relevant to affected stakeholders.

We will publish implementation plans, provide regular public updates on the implementation of these policies and welcome stakeholder feedback. Our goal is to continuously enhance policy implementation in alignment with relevant sustainability frameworks and regulations. As new insights emerge, whether through internal experience or external research, Wilmar will refine our approach to support climate change mitigation, forest and peatland protection, and the safeguarding of human and community rights.