



SEXUAL HARASSMENT, VIOLENCE AND ABUSE, REPRODUCTIVE RIGHTS POLICY

Wilmar International ("Wilmar") endeavours to provide a conducive working environment that is characterized by equality and mutual respect. To that end, this sexual harassment, violence and abuse, and reproductive rights policy encourages the reporting of all incidents of sexual harassment violence and abuse, and infringement of reproductive rights experienced by any individual – regardless of gender or age – as a result of his or her work with the firm. Wilmar will take all reasonable measures to prevent such incidents and deal promptly and fairly with any reports of sexual harassment in a confidential and discreet manner. Where allegations of sexual harassment violence and abuse, and infringement reproductive rights are substantiated, the offender will be sanctioned in strict accordance with this policy, regardless of his or status at the company.

A. Definitions

i) Sexual harassment

Sexual harassment is defined as the making of unwanted and offensive advances; requests for sexual favours and/or other verbal or physical conduct of a sexual nature. These actions are considered harassment when:

1. Such conduct is made either implicitly or explicitly a term or condition of an individual's continued employment, career advancement or promotion
2. Submission to or rejection of such conduct by an individual is used as the basis for employment or career decisions affecting such individual; or
3. The conduct has the purpose or effect of unreasonably interfering with an individual's work or job performance or creating an intimidating, hostile, or offensive working environment.

ii) Violence and abuse

It is any act in which any person is abused, threatened, intimidated or assaulted in his or her employment. Workplace violence and abuse includes:

- a) Physical attacks: involving contact intended to cause feelings of intimidation, pain, injury, or other physical suffering or bodily harm.
- b) Threatening behavior: intentionally putting another person in fear of imminent bodily injury.
- c) Verbal or written threat/abuse: any expression with an intent to inflict harm or a form of emotionally abusive involving the use of threatening language.
- d) Emotional/psychological abuse: a deliberate behavior to make the individual feel diminished or embarrassed, privately or publicly humiliating, implicitly blackmailing, withholding information, controlling and suppression of the access or other basic resources and necessities.

iii) Reproductive rights

Reproductive rights are legal rights and freedom relating to reproduction and reproductive health as couples and individuals:

- a) To decide freely and responsibly the number, spacing and timing of their children
- b) To make decisions concerning reproduction free of discrimination, coercion and violence.

B. Application

This policy is designed to protect all employees of the company, and applies to peers as well as superior-subordinate relationships. It also applies to all individuals, regardless of gender.

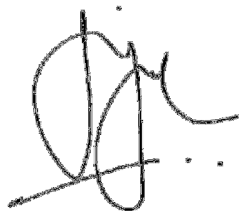
C. Provisions

1. Further harassment, violence and abuse, and infringement reproductive rights against complainants or retaliation against complainants or others who participate in the investigation process of a complaint will not be tolerated. Appropriate disciplinary and/or remedial action will be taken against individuals found to engaging in such misconduct.
2. It is the obligation and shared responsibility of all employees to adhere to this policy.

D. Enforcement Principles

Enforcement and implementation of this policy will observe the following principles:

- Investigations must be conducted promptly and thoroughly upon receiving the complaint;
- Both the complainant and the alleged harasser will be informed of the findings and notified of the outcome of the complaint as soon as the investigation is concluded;
- Where a charge of sexual harassment, violence and abuse, and infringement of reproductive rights is substantiated, the company will act fairly and justly in imposing an appropriate sanction, up to discharge from the company;
- If the investigation reveals evidence that the complainant falsely accuse another of sexual harassment, violence and abuse, and infringement reproductive rights the complainant will be appropriately disciplined;
- Seniority and/or status at the company have no bearing on or will not affect the decision as to the appropriate sanction in the circumstances;
- The company shall maintain a written record of each complaint and how it was investigated and resolved. Records will be maintained in a confidential manner.



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