



Wilmar Integrated Policy

Rapid Assessment

PT Wilmar Nabati Indonesia Gresik
Refinery

Overarching Report

Jakarta

July 2016



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II. Acknowledgement

Wilmar and TFT would like to acknowledge the support of all parties that have participated in this collaboration. A large number of people (both internally and third-party suppliers) have contributed their time, effort, experience and expertise to this process, which is an essential element in the transformational journey.

Company and individual details are not included in this report to respect confidential and commercial data and information.

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IV. Executive Summary

Thirteen mills were selected from a sample of 'high priority' mills identified through the Mill Prioritisation Process¹ (MPP), which was prepared in August 2015, from a total of 131 palm oil mills supplying to PT Wilmar Nabati Indonesia Gresik Refinery (WINA Gresik) in East Java, Indonesia.

Field visits have been completed for all thirteen palm oil mills and their supply bases in Kalimantan and Sulawesi. A summary of all findings from the thirteen mills and their supply bases can be found in Appendix 1.

This report portrays a summary of findings from all the visits completed under the WINA Gresik Aggregator/Refinery Transformation (ART) plan, and intends to give readers some ideas about the current situation on the ground and areas that require improvement. Actions and recommendations have been proposed to effectively tackle these issues. Involvement from various stakeholders will be critical to bringing about the necessary changes and mills in the supply chain will need to take ownership in driving a positive transformation through their Fresh Fruit Bunches (FFB) supply base.

Main Findings

Positive findings:

With regards to legal compliance, the mills visited and their core estates were found to have adopted numerous legal requirements set forth under relevant Indonesian regulations. Many of the companies visited were also found to have adopted activities designed to conserve and protect high conservation value areas. Hazardous and Toxic Waste were in many instances found to have been managed effectively with temporary storage areas established. All companies were found to have incorporated smallholders into their supply chain as suppliers of Fresh Fruit Bunches (FFB) and mills were generally aware of the geographic locations from which they sourced their FFB.

Areas for improvement:

Legal and Compliance

Most smallholders were found to be without registration certificates required by government regulations; this is a regular situation throughout Indonesia because smallholders are often unaware of their need to comply with these legal requirements. Whilst all estates had applied for Cultivation Rights (HGUs²), some had yet to obtain the final issuance due to delays in the

¹ http://www.tft-transparency.org/app/uploads/2015/10/Mill-Prioritisation-Process_Dec-2015.pdf

² Hak Guna Usaha: This Land Use Title is necessary for the company to demonstrate the right to cultivate on the land

approval process; therefore improvements to legal compliance are necessary.

Protection of Key Conservation Value Areas

Some companies who had conducted High Conservation Value (HCV) assessments had not completed them in accordance with the Indonesia HCV toolkit 2008 and Management and Monitoring Plans for conservation of HCV areas require improvement in line with best practice. Some companies with areas of undeveloped land banks have not conducted High Carbon Stock (HCS) assessments to identify areas for conservation.

Peat

Peat management is required to be improved through implementation of Best Management Practices as described by National Regulations and 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', June 2012, especially water management, fire avoidance, fertiliser use, subsidence and vegetation cover.

Environment Impact Management

Some companies were found to be still using chemicals prohibited under WHO Class 1A & 1B categories, and Paraquat whilst nearly all waste disposal sites were found to be managed poorly. Waste management landfills were generally found to be poorly managed and in a limited number of cases chemicals storage was also found to be managed poorly and not in accordance with relevant standards.

People and Communities

Almost all companies were found to have not conducted social impact studies. Some were found to be in need of improving their Occupational Health and Safety management practices in accordance with relevant standards. Some companies are found to need to ensure that all employees are provided with an employment contract clearly outlining the terms of their employment. Many companies were found to be in need of implementing appropriate grievance procedures and conflict resolution processes.

Creation of Shared Values

Almost all companies were found to be in need of improving smallholders' ability to participate in the deforestation-free supply chain by supporting them with examples of good practice.

Traceability

Most companies were found to be in need of establishing documented traceability systems allowing them to ensure traceability to origin of the FFB.

A. Introduction

A1. Wilmar's Integrated Policy

Recognising that the industry must change to ensure it remains sustainable and profitable for the long term. Wilmar International Limited committed to a No Deforestation, No Peat and No Exploitation Policy. The provisions of the integrated policy apply to all Wilmar operations worldwide and all third-party suppliers from whom Wilmar purchases or with whom Wilmar has a trading relationship. As part of the process of verifying suppliers against Wilmar's Integrated Policy, Wilmar's supplying mills and growers to WINA Gresik refinery, East Java, were assessed.

A2. Prioritising Mill Visits

In order to prioritise which mills to visit, the Mill Prioritisation Process (MPP) was first carried out. The MPP analyses both spatial and non-spatial attributes of each mill. Spatial attributes include information on legally protected areas, key biodiversity areas, peat areas and potential forest disturbance areas within a mill's estimated supply base. The non-spatial attributes in the MPP include the mill's own sustainability policy, RSPO & ISPO certification status, supplying volume to the refinery and publicly reported information. This method helps prioritise supplier visits based on potential risks around environmental and social factors associated with the palm oil mill and its supply base (estates and smallholders). Out of the higher priority mills, thirteen supplying mills were selected for field visits (approx. 10% of supplying mills to WINA Gresik refinery). This report presents the overall findings from thirteen Palm Oil Mills (POMs) and their FFB suppliers (integrated and third-party suppliers) who were visited in the calendar year 2015. Proposed actions and recommendations are included in the resulting report to assist in the transformation and continuous improvement of the supply base, in accordance with Wilmar's Integrated Policy.

A3. Bringing Change

Each entity visited (mill, estate, smallholder) is issued with its own individual entity report, which outlines in detail the findings at that particular entity and provides recommendations and action items for improvement. As part of the deep engagement process, targeted entities will be revisited in order to discuss the implementation of the proposed actions and to establish practical action plans for on-going monitoring. The mills and growers in the WINA Gresik supply base which were not visited will be engaged as part of a broader engagement to share the general findings. They will be issued with this report explaining the common findings across the visits and proposing actions that could be taken to resolve commonly found issues. Trainings and assistance tailored to these common issues will then be provided to assist entities in the supply base.

A4. Scope of Assessment

This report presents the findings from thirteen visits to the selected POMs and a sample of their integrated and third-party FFB suppliers. These FFB suppliers include estates and smallholders. Dealers were also prominent suppliers to the mills visited in this region. Dealers were engaged as part of the visits, in order to gain an understanding of their supply catchment; and findings are included in this report. The samples of each mill's suppliers visited were in most cases selected by TFT and Wilmar based on each mill's supplier list prior to, and on occasion at the beginning of, the visit. The suppliers selected were often the larger volume suppliers to the POMs as well as those located in geographical priority areas. Availability of the owner/management was also influential to decision making in some cases. It is pertinent to note that suppliers in Indonesia were initially reluctant to agree to being involved at the beginning of this process but that the perceived reluctance diminished over time. In cases where suppliers did not provide transparency into all of the areas their operation or all of the documents that were requested to be reviewed as part of the assessment, the findings were tailored to address these barriers to transparency.

The categories of the plantations are as follows:

Category	Acronym	Description
Estate	Est.	Estates are areas of palm oil plantation managed for the purpose of Palm Fruit production. Prior to establishing estates on state land, a company must obtain legal cultivation rights in the form of a HGU. Estates can also be established without a HGU on land where the individual/entity has obtained land tenure through other means, such as a freehold title. Estates are typically greater than 25 hectares as smaller plantations are subject to substantially reduced legal/regulatory requirements and commonly referred to as smallholders. The maximum area that can be managed by a single Company established for the purpose of plantation management is 100,000 hectares, however legal structures permit companies effectively own unlimited aggregate plantation sizes.
Smallholders	SH	A legal framework exists in Indonesia regarding the establishment of smallholder plantations for the purpose of palm oil cultivation and the associated land tenure; but ambiguity exists between customary and formal land laws, and competing claims over land are common in Indonesia. Smallholder plantations are required to be registered with the regent/mayor and have issued a Plantation Cultivation Business Certificate (STD-B). Smallholders can demonstrate land tenure rights through a land ownership certificate (SHM) or a letter of notification for land ownership released by village head (SKT). Smallholder plantations less than 25 hectares are subject to minimal legal requirements.

The mills, estates, and smallholders visited were assessed against Wilmar's integrated policy. The assessment was not conducted as an auditor or certification body would, on the contrary, TFT approached the field visits as an opportunity to provide advice which might help the suppliers meet Market Expectations. The objective was to work together with the mills, plantations and smallholders to create pragmatic and collaborative solutions for improvement. Whilst the assessments did not cover all policy criteria in a holistic way at each site, the assessments broadly covered:

1. No deforestation of high conservation value (HCV) or high carbon stock (HCS) areas.
2. No new development on peat.
3. No exploitation of rights of workers, indigenous peoples and local communities.

The resulting visit report outlines the strengths and weaknesses of management and operational practices observed and reviewed during the assessment visits, and provides examples (Recommendations) on where identified shortcomings require immediate and long-term management and operational attention. These concerns are highlighted to ensure that the integrity of Wilmar's supply chain is maintained and should be prioritised. It should be emphasised that most, if not all, of the issues of concern highlighted in the report are common across the industry and are not specific to Wilmar's supply chain.

B. Aggregator/Refinery Transformation Plan Progress

B1. Mill Prioritisation Process & Selection Progress

The Mill Prioritisation Process (MPP) was completed to identify highest priority mills from which thirteen mills were selected for field visits.

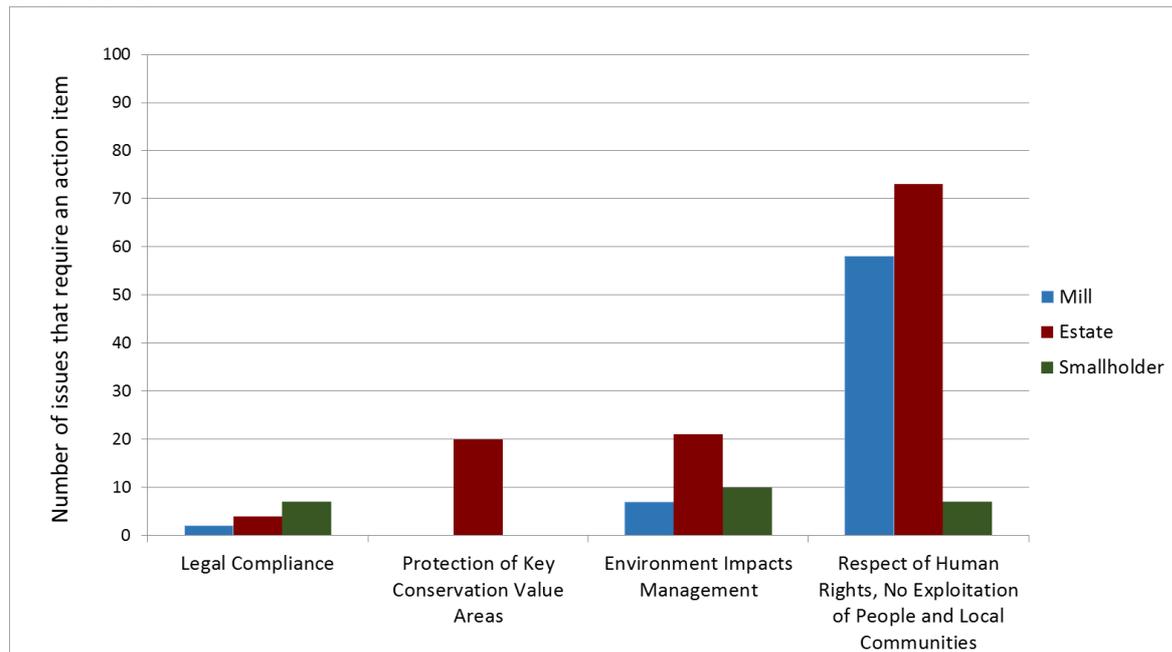
Table 1: Summary of Mill Prioritisation Process

No.	Item	Total
1	Identification and verification of supplying mills	131
2	Visited mills that were selected through the prioritization process using spatial and non-spatial data with consideration given to the potential to leverage change.	13

C. WINA Gresik Supply Chain Overview

This section summarises the strengths and weaknesses relating to policy compliance observed during the site visits. The strengths and weaknesses outlined below have been recorded against the individual objectives of the Wilmar Policy. Further details of the criteria and observation used to assess compliance across the policy objectives is available in the summary reports and individual entity reports for each of the mills visited.

Figure 1: Number of Findings requiring follow up actions across four clusters of criteria



C1. Legal Compliance

With regards to legal compliance, mills and their core estates were found to have implemented various legal requirements set forth under relevant Indonesian regulations. This includes necessary permits and certificates, including: SIUP³, SITU, NPWP, TDP, IUP, IUP-P, HO, SIO for Equipment, SIO for Operator, EIA, RKL-RPL and HGU. Specific areas of legal compliance requiring attention are identified in the table below.

³ SIUP – trading permit, SITU – location permit, NPWP – tax registration, TDP – trading registration, IUP – plantation permit, IUP-P – factory permit, HO – location permit, SIO – equipment permit, SIO - operator permit, EIA – Environmental Impact Assessment, RKL – Environmental management plan, RPL – Environmental monitoring plan, HGU – Rights to Cultivate Land,

Table 2: Recommendations related to Legal Compliance

Issues Found	Recommendation	Applicable to
<p>Many smallholders who supply FFB to the mills do not have necessary permits in accordance with the size of their operation. These include <i>Certificates of Registration for Plantation Operation (STD-B)</i> for operations less than 25 hectares and <i>Plantation Business License – Cultivation (IUP-B)</i> for plantations greater than 25 hectares as required by government regulations.</p>	<p>Mills/Core Estates should inform and educate the relevant suppliers about the importance of obtaining a <i>Certificate of Registration for Plantation Operation (STB-B)</i> and a <i>Plantation Business License – Cultivation (IUP-B)</i> from the relevant government offices.</p>	<p>Smallholders</p>
<p>Some companies have yet to obtain HGUs which is the ultimate representation of cultivation rights for industrial plantation operations. HGUs are required to demonstrate land tenure over state owned land and may incorporate freehold land acquired from communities or enclave land which communities do not agree to relinquish. The process for obtaining a HGU in Indonesia can take numerous years due to various reasons⁴, including but not limited to the ambiguity resulting from the lack of a unified system for managing land tenure in Indonesia.</p>	<p>Companies that have not been issued with a HGU should implement a time bound plan to resolve any outstanding issues which are preventing issuance of the HGU.</p>	<p>Estates</p>
<p>Some companies were found to have not yet allocated areas for plasma estate or fully fulfilled plasma requirements associated with their plantations.</p>	<p>Companies that have not yet fulfilled their plasma responsibilities should implement a time bound plan to resolve any outstanding issues for the surrounding community and monitor implementation of the plan.</p>	<p>Estate</p>

⁴ For example, in the Central Kalimantan province, the government spatial plan (RTRW) which forms the basis for land allocation has yet to be formalized. This creates an increased likelihood of overlaps in permits and boundaries especially between forests and oil palm areas, as the local government may independently issue permits for oil palm. These problems of multiple permits/ boundary overlays have prevented the National Land Authority from being able to issue Cultivation Rights as required. Based on existing regulations, re-gazetting of forest land into oil palm plantation can only be performed if there are readily available areas for land swaps. The added complication arises because the process to identify suitable areas for land swap can take many years.

C2. Protection of Key Conservation Areas

Many of the companies visited have a commitment to conservation of HCV areas and some companies are involved in specific activities designed to conserve and protect HCV areas. Some observed examples of HCV area protection/management include the establishment of restrictions on chemical use in riparian zones and the preservation of swamp areas in water catchment areas. Whilst some companies have documents relating to the identification of HCV areas, the use of best practice HCV management approaches was not found to be common.

Table 3. Recommendations related to Key Conservation Value Areas

Issues Found	Recommendation	Applicable to
<p>Not all companies have conducted HCV assessments, and not all those companies who have conducted HCV assessments have completed them in accordance with the Indonesia HCV toolkit 2008.</p>	<p>HCV assessments should be conducted in line with the Indonesia HCV Toolkit 2008, which includes the steps of: identification, public consultation and peer review. All HCV assessments since 1 January 2015 are to be conducted by HCV Licensed Assessors registered with the HCV Resource Network. Monitoring and Management plans are to be developed which corresponds with the monitoring and management of HCV areas prior to conducting new land clearing.</p>	<p>Estates</p>
<p>Many companies had not yet committed to prevention of deforestation or to undertake High Carbon Stock (HCS) analysis prior to undertaking any new development.</p>	<p>Companies with undeveloped land areas within their land banks should commit to preventing deforestation and to conducting HCS studies following the HCS Approach toolkit and using registered HCS practitioners. The related monitoring and management plans will need to be developed which corresponds with the monitoring and management of HCS areas prior to conducting new land clearing.</p>	<p>Estates</p>
<p>Satellite imagery and field observations indicate that some smallholder expansion continues, including in areas containing potential HCV and HCS forest.</p>	<p>Facilitate inclusion of smallholders in the Deforestation-free Supply Chain by communicating details of the Integrated policy to smallholders and by providing smallholders with access to information on industry best</p>	<p>Smallholders</p>

	practices for plantation development.	
Management and Monitoring Plans for conservation/HCV areas are not in line with best practice. For example, riparian zones are not always left as forest and in cases where plantations have been established close to the river edge riparian zones have not always been managed appropriately through, for example, planting endemic species. Also, biodiversity monitoring of species in identified HCV areas is uncommon.	Once HCV assessments are complete, HCV Management and Monitoring Plans should be prepared and implemented in line with the recommendations in the HCV report.	Estates
Peat management by some companies and smallholders is not in accordance with Best Management Practices on Peat. Most smallholders do not build canals and where they have been built the canals are often not operated in accordance with best practice for managing water levels in peat areas.	Where plantations have been developed in peat areas, Best Management Practices need to be implemented according to national regulations and 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', June 2012, especially water management, fire avoidance, fertiliser use, subsidence and vegetation cover.	Estates, Smallholders



Figure 2. A Riparian Zone



Figure 3. Tree with Honey Production



Figure 4. HCV area signage



Figure 5. A protected lake

C3. Environmental Management

In general, practices were found to be in place for the management of environmental impacts in the form of Environmental Management Plan and Environmental Monitoring Plan processes established under Indonesian regulation. Hazardous and Toxic Waste (B3) was found to have been managed properly and temporary storage areas for B3 waste built. Solid wastes, Palm oil mill effluent (POME) were found to be routinely utilised for land application to enhance soil fertility.

Table 4. Recommendations related to Environmental Impacts Management

Issues Found	Recommendation	Applicable to
Some companies have yet to adopt policies and practices which ensure that fire/burning is not used as part of their operations. In some cases where fires prevention measures had been implemented, it was found that the measures were not sufficient to ensure that fires do not occur in the concession areas.	The Companies should evaluate performance of the Emergency Response and fire prevention measures and ensure implementation of best practices with regards prevention of fires, minimisation of the impacts of fires and the company's capacity to extinguish fires if they occur.	Estates
Some companies still use chemicals prohibited under WHO Class 1A & 1B categories, and still use Paraquat.	Chemicals categorized as WHO Class 1A & 1B should not be used and replaced with chemicals that have the same function but are permitted under relevant regulations. Similarly, the use of Paraquat is prohibited under Wilmar's policy and should also be replaced with chemicals that have the same function but are permitted under relevant regulations.	Estates
Some companies were found to be without landfills to dispose waste and nearly all observed landfills	Ensure that managed landfills are built/used and that organic waste is separated from inorganic waste.	Mills, Estates

<p>were found to be managed poorly. For example, waste separation was found to be uncommon and domestic waste was often disposed of in an ad hoc manner by landfill on site with inorganic waste often buried together with organic waste. In some cases waste was burned.</p>		
<p>Chemicals storage at some companies and smallholders has not been managed properly. Chemicals are stored along with other materials and not equipped with Material Safety Data Sheet (MSDS).</p>	<p>Build proper chemical storage facilities. Ensure all chemicals are supplied with MSDS and records maintained.</p>	<p>Estates, Smallholders</p>



Figure 6. Temporary Hazardous Waste



Figure 7. Land Application of Waste



Figure 8. Empty Fruit Bunches turned into Fertilizer

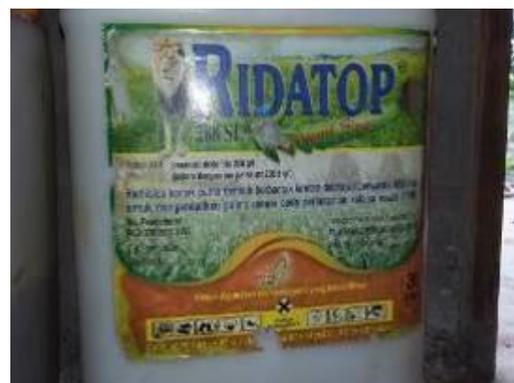


Figure 9. Hazardous Chemicals

C4. No Exploitation of Labour and Local Communities

Generally, health and educational facilities were found to be available and in reasonable condition. Almost all companies were found to have provided clinics and school facilities. Relations with the surrounding communities were found to be positive in almost all the companies visited.

Table 5. Recommendations related to No Exploitation of Labour and Local Communities

Issues Found	Recommendation	Applicable to
<p>Almost all companies have not conducted social impact studies as part of social management planning.</p>	<p>Conduct a Social Impact Study to formulate a Management and Monitoring Plan relating to social aspects in order to minimise the potential for conflict.</p>	<p>Mills, Estates</p>
<p>In some companies Occupational Health and Safety (OHS) management has not been carried out regularly/ consistently, e.g. deficiencies were observed in the availability of HIRA⁵, fire extinguishers, PPE, the relevant OHS procedures, the organisational structure of Safety Committee and the required OHS Experts.</p>	<p>Build human resources capacity in relation to OHS Management System to ensure that OHS implementation is an integral part of operational activities.</p>	<p>Mills, Estates</p>
<p>At some companies, manpower functions relating to employment contracts, labour unions, employee housing facilities, emergency response teams as well as occupational health and injury insurance do not comply with the relevant regulations.</p>	<p>Understanding of, and competency in, the application of national labour regulations and Wilmar's Integrated Policy should be strengthened through workshops/training for responsible staff and parties.</p>	<p>Mills, Estates,</p>
<p>At some companies, there are no policies relating to minimum age of employment, forced/bonded labour, remedial access, whistle-blower protection and sexual harassment prevention.</p>	<p>Undertake workshop/training on the implementation of 'no exploitation' aspects to improve understanding and implementation of policies and procedures relating to employment contracts, forced/bonded labour, remedial access, whistle-blower protection and sexual harassment prevention.</p>	<p>Mills, Estates</p>
<p>Mechanisms for the implementation of grievance handling procedures have not been developed at most companies. Such mechanisms should ensure that the grievance committee has some independence from company management to ensure impartiality, for example through inclusion of the workers union.</p>	<p>Put in place a mechanism for grievance handling with scope to cover both internal and external grievances.</p>	<p>Mills, Estates</p>

⁵ HIRA: Hazard Identification and Risk Assessment



Figure 10. Day Care



Figure 11. School Bus



Figure 12. Sample Employment Contract



Figure 13. Weed spraying personnel PPE

C5. Creation of Shared Values

All companies were found to have incorporated smallholders into their supply chain as suppliers of FFB.

Table 6. Recommendations related to Creation of Shared Values

Issues Found	Recommendation	Applicable to
Contracts with third-party FFB supplier do not incorporate requirements related to OHS standards, NDPE policies, Traceability and Transparency.	The companies should disseminate information related to OHS standards, NDPE policies, Traceability and Transparency and help third party suppliers understand the importance of incorporating these requirements into supply contracts.	Mills



Figure 14. FFB delivery

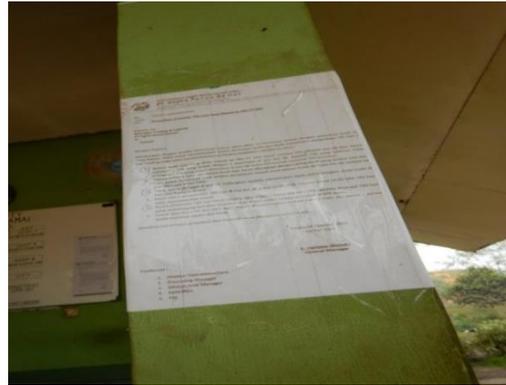


Figure 15. FFB pricing announcement

C6. Traceability

Some of the companies were found to have data/ records about their suppliers of FFB and companies were generally aware of the geographic locations from which they sourced their FFB.

Table 7. Recommendations related to Traceability

Issues Found	Recommendation	Applicable to
Most companies have not established a formal traceability system consisting of procedures and supply chain documentation; or established (with documentation) the person in charge of these systems.	The companies should establish a traceability system including procedures and records of suppliers which includes the co-ordinates of the growers' lands; and establish (with documentation) a person in charge of managing the system.	Mills



Figure 16. Smallholder estate location



Figure 17. FFB at a smallholder

D. Discussion & Next Steps

Actions to address the findings identified during the visits to mills and FFB suppliers shall be the basis for an action plan (with those mills already assessed) to close the gaps in areas where issues have been identified. Wilmar, with support from TFT, shall re-engage with the mills to discuss and agree the most viable approach to ensure the issues identified are addressed in an effective and timely manner.

a. Wilmar should request mills to:

- i. Follow up and close gaps found in individual entity reports
- ii. Encourage and monitor FFB supplier's efforts to close gaps found in their entity reports
- iii. Implement the guidance for transformation (recommendations and proposed actions)
- iv. Provide quarterly updates to Wilmar on progress

The commonalities in findings among the entities visited indicate that it is likely that other suppliers in the Refinery catchment area are facing similar issues and there is an opportunity to incorporate multi-stakeholder approaches as part of the solutions to addressing some of these issues. However, it should be noted that the mill selection process was designed to focus the attention on mills and plantations where there were more likely to be weaknesses in policy implementation which required attention.

TFT and Wilmar shall use the common findings to introduce and drive the Aggregator/Refinery Transformation (ART) plan with the other suppliers (who were not assessed) in Wilmar's WINA Gresik Refinery supply bases. This shall be done in parallel, while re-engaging with the thirteen assessed mills on a plan of action.

To empower the supply chain, the following broad steps are proposed:

- Combine mills in the catchment area into regional groups
- Based on issues identified in the overarching report, organise workshops to present issues, discuss solution and deliver trainings to improve practises.

APPENDIX 1: Summary of all Findings⁶

Legend		There is no legal breach	No development of High Carbon Stock (HCS) Forests	No development of High Conservation Value (HCV) Areas	No development on peat regardless of depth	Best Management Practices for existing plantations on peat	Where feasible, explore options for peat restoration by working with experts, stakeholders and communities	Minimisation of environmental impacts	No burning	No use of highly hazardous pesticides	Facilitate the inclusion of smallholders into the supply chain	The company is committed to transparency	The company is committed to long term financial and economic viability	Traceability
Palm Oil Mill	Entity Type	Legal Compliance	Protection of Key Conservation Value Areas				Environment Impacts Management			Creation of Shared Values			Traceability	
Total		9	4	11	0	3	2	8	6	9	3	5	2	7
Percentage		60%	27%	73%	0%	20%	13%	53%	40%	60%	20%	33%	13%	47%
Mill 1	Mill	0	NA	NA	NA	NA	NA	1	NA	NA	0	0	NE	1
	Est	1	1	1	NA	NA	NA	1	1	1	NA	0	NE	NA
	SH	1	NE	NE	NA	NA	NA	1	1	0	NA	0	NA	NA
	SH	1	NE	NE	NA	NA	NA	1	0	1	NA	0	NA	NA
Mill 2	Mill	0	NA	NA	NA	NA	NA	0	0	0	0	0	0	0
	Est	0	NA	0	NA	NA	NA	0	1	0	0	0	0	0
	SH	0	NA	0	NA	NA	NA	0	0	0	NA	NA	0	0
Mill 3	Mill	0	NA	NA	NA	NA	NA	1	0	0	0	0	1	0
	Est	1	1	1	NA	NA	NA	1	0	0	NA	0	1	NA
Mill 4	Mill	0	NA	NA	NA	NA	NA	0	NA	NA	1	1	NE	1
	Est	0	0	1	0	1	NE	1	0	NE	0	NE	NE	NA
	Est	0	NE	NE	NE	NE	NA	0	NE	NE	NE	NE	NE	NA
	SH	1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1
Mill 5	Mill	1	NA	NA	NA	NA	NA	1	NA	NA	1	1	1	1
	Est	0	1	1	NA	NA	NA	1	1	1	NA	1	1	NA
	SH	1	NA	NA	NA	NA	NA	1	1	1	1	NA	NA	NA
	SH	1	NA	NA	NA	NA	NA	1	0	1	1	NA	NA	NA
	SH	1	NA	NA	NA	NA	NA	1	0	1	1	NA	NA	NA
Mill 6	Mill	0	NA	NA	NA	NA	NA	0	NA	NA	NE	NE	NE	NE
	Est	0	NA	1	NA	NA	NA	1	1	NE	NE	NE	NE	NE
Mill 7	Mill	0	NA	NA	NA	NA	NA	0	0	0	0	0	0	0
	Est	0	0	1	NA	NA	NA	0	0	0	0	0	0	0
	Est	0	0	0	NA	NA	NA	0	0	0	0	0	0	0
	SH	1	0	0	NA	NA	NA	0	0	1	0	0	0	0
Mill 8	Mill	0	NA	NA	NA	NA	NA	1	NA	NA	0	1	0	1
	Est	0	0	1	0	0	NA	1	0	0	0	1	0	NA
	SH	1	NA	NA	NA	NA	NA	NA	NA	1	NA	NA	NA	NA
	SH	1	NA	NA	NA	NA	NA	NA	NA	1	NA	NA	NA	NA
Mill 9	Mill	0	NA	NA	NA	NA	NA	0	NA	NA	NE	0	0	1
	Est	0	1	0	NA	NA	NA	0	0	1	NE	0	0	NA
Mill 10	Mill	0	NA	NA	NA	NA	NA	1	1	NA	0	1	0	1
	Est	1	0	1	0	1	1	1	0	0	NA	1	0	NA
	Est	1	0	NE	NE	NE	NE	1	1	1	NA	NA	NA	NA
	SH	1	NA	NA	NA	NA	NA	NA	1	1	NA	NA	NA	NA
	SH	1	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA	NA
Mill 11	Mill	1	NA	NA	NA	NA	NA	1	0	NA	1	0	0	0
	Est	1	NA	1	0	1	1	1	1	1	NA	NA	NA	NA
Mill 12	Mill	0	NA	NA	NA	NA	NA	0	0	NA	0	0	0	0
	Est	0	0	1	NA	NA	NA	0	0	0	NA	0	0	NA
	Est	0	0	1	NA	NA	NA	0	0	1	NA	0	0	NA
Mill 13	Mill	0	NA	NA	NA	NA	NA	0	0	NA	0	1	0	1
	Mill	0	NA	NA	NA	NA	NA	0	0	NA	0	1	0	1
	Est	0	0	1	0	NA	NA	0	0	1	NA	1	0	NA
	SH	1	0	NA	NA	NA	NA	0	0	1	NA	NA	NA	NA

⁶ Criteria were assessed as follows: 0 = Complies, no issue, N/E = Not evaluated, due to time constraint or no access, 1 = Potential issue exist, N/A = Not Applicable

Legend		Minimisation of negative social impacts	Respect and support the Universal Declaration of Human Rights	Respect and recognise the rights of all workers including contract, temporary and migrant workers	Freedom to all workers to form and join trade unions and to bargain collectively.	Child labour	Forced and bonded labour	No unlawful document retention	Ethical recruitment	Employment contracts	Wages	Working hours	Workplace accident insurance	Record keeping	Respect for diversity	Harassment and abuse	Access to remedy	Data protection principles	Occupational health and safety	Accommodations	Respect land tenure rights	Grievance Handling	Resolve all complaints and conflicts through an open, transparent and consultative process
SH=Smallholders	Est=Estate	Respect of Human Rights, No Exploitation of People and Local Communities																					
Palm Oil Mill	Entity Type																						
Total	Percentage	9	4	3	4	2	5	0	0	3	1	0	1	0	3	3	5	3	9	6	8	6	7
		60%	27%	20%	27%	13%	33%	0%	0%	20%	7%	0%	7%	0%	20%	20%	33%	20%	60%	40%	53%	40%	47%
Mill 1	Mill	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	1	1	1
	Est	1	1	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	1	1	1	1	1
	SH	NE	NE	NE	NE	0	0	NE	NE	NE	0	0	NE	NE	NE	NE	NE	NE	0	0	0	NE	NE
	SH	NE	NE	NE	NE	0	0	NE	NE	NE	0	0	NE	NE	NE	NE	NE	NE	0	0	0	NE	NE
Mill 2	Mill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0
	Est	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	SH	NA	NA	NA	NA	0	NA	NA	0	NA	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0	NA
	SH	NA	NA	NA	NA	0	NA	NA	0	NA	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0	NA
Mill 3	Mill	1	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
	Est	1	0	0	0	0	1	NA	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
	SH	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
	SH	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
Mill 4	Mill	1	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	0	1
	Est	1	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	0	1
	SH	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
	SH	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE
Mill 5	Mill	1	1	1	1	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	0	NA	1
	Est	1	1	1	1	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	1	1
	SH	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	NA	1	0	0
	SH	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	NA	1	0	0
Mill 6	Mill	1	1	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	1	0	1	NE
	Est	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	1	1	1	NE
	SH	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	1	1	1	NE
	SH	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	1	1	1	NE
Mill 7	Mill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Est	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	SH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	SH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mill 8	Mill	1	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	1	1	0	0	0	1
	Est	1	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	1	1	0	1	0	1
	SH	NA	NA	0	0	0	0	NA	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	SH	NA	NA	0	NA	NA	0	NA	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mill 9	Mill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0
	Est	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	SH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	SH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mill 10	Mill	1	0	0	0	0	1	NE	0	0	0	0	0	0	1	0	1	0	1	0	0	1	1
	Est	1	0	0	0	0	0	NE	0	0	0	0	0	0	1	0	1	0	0	1	1	1	1
	SH	NA	NA	NA	NA	0	0	NA	NA	1	1	0	1	NA	NA	NA	NA	NA	1	0	0	NA	NA
	SH	NA	NA	NA	NA	0	0	NA	NA	0	0	0	0	NA	NA	NA	NA	NA	1	0	0	NA	NA
Mill 11	Mill	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	1
	Est	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	1
	SH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	SH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mill 12	Mill	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Est	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0
	SH	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	0
	SH	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	0
Mill 13	Mill	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	1
	Est	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	1
	SH	0	NA	NA	NA	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1	NA	NA	NA	NA
	SH	0	NA	NA	NA	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1	NA	NA	NA	NA