

Ineligible Grievance
Updated: 5 February 2021

No	Group	Concession	Grievance Report	Stakeholder	Investigation Outcome
1	Anglo Eastern Plantations	Kahayan Agro Plantation	Rapid Response Report 1 , 14 , 15 , 24 , 25	Mighty Earth	Anglo Eastern has already submitted the HCS report for peer review and land clearing identified is located outside the identified HCS area.
2	Widya Corporation	Mulia Inti Perkasa	Rapid Response Report 15 , 25 , 29	Mighty Earth	Mulia Inti Perkasa has already conducted all the necessary assessment, including HCS and HCV in 2018. MIP has also submitted their maps for our internal monitoring. Based on our investigation, the area identified in the report is outside the HCV/HCS area.
3	Fangiono Agro Plantation Group (FAP Agri)	Ketapang Hijau Lestari	Rapid Response Report 9	Mighty Earth	High Carbon Stock assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organization with HCSA. Based on our monitoring, there was no land clearing at HCS area identified. FAP Agri has also published their NDPE policy in October 2019.
4	Mulia Sawit	Persada Era Agro Kencana	Rapid Response Report 9 , 10 , 11 , 12 , 15 , 25	Mighty Earth	Not a supplier to Wilmar
5	Rimbunan Hijau Group	Jaya Tiasa Holdings Berhad	Rapid Response Report 12	Mighty Earth	The land clearing is not related to oil palm development

Ineligible Grievance

Updated: 5 February 2021

6	Triputra Group	Dwiwira Lestari Jaya	Rapid Response Report 12	Mighty Earth	THCV and HCS assessment has already been conducted at PT Dwiwira Lestari Jaya in 2014 and 2016, respectively and there were no land clearing activities at the HCV/HCS area. For more details please refer to the overlap maps . As a RSPO member, Triputra has also publicly committed to support NDPE policy. Wilmar has been engaging with Triputra in the compliance to the NDPE policy since 2015, where we have conducted a field visit to one of Triputra's operation in 2015 under our ART programme . In 2016, upon the recommendation from Wilmar, Triputra's team has also attended trainings organised by the HCSA steering group where Triputra has become a Registered Practitioner Organisation and have a few registered individuals within organisation.
7	Samling	LPF/0008 Marudi & Batu Belah	Rapid Response Report 13	Mighty Earth	The land clearing is not related to oil palm development. Our last purchase was in January 2020
8	Borneo Pacific	Arjuna Utama Sawit	Rapid Response Report 14 , 18 , 23	Mighty Earth	Not a supplier to Wilmar
9	TH Plantations Berhad	Hydroflow	Rapid Response Report 14 , 23 , 27	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary
10	Perkebunan Nusantara	Perkebunan Nusantara II Prafi	Rapid Response Report 15	Mighty Earth	Divested since 2014
11	Samling	Samling Jelalong LPF 0007	Rapid Response Report 15	Mighty Earth	The land clearing is not related to oil palm development. Our last purchase was in January 2020.

Ineligible Grievance

Updated: 5 February 2021

12	Ta Ann	Ladang Selezu	Rapid Response Report 15 , 16	Mighty Earth	Wilmar has initiated engagement with Ta Ann since May 2019 to seek clarifications on allegation of deforestation. Ta Ann has provided written commitment in adhering to the NDPE policy and shared their concession maps for further investigation. Moratorium has been put in place. A meeting was held on 21 June 2019 to discuss the issues and a follow up meeting took place on 12 July 2019 for further discussion. As part of the investigation, Wilmar team has conducted a field assessment from 22-27 July to verify the allegation. The field assessment has verified that the deforestation happened outside Ladang Selezu's concession boundaries.
13	TH Plantations Berhad	Ladang Tabung Haji	Rapid Response Report 15 , 18 , 20	Mighty Earth	This concession doesn't belong to TH Plantations Berhad since 2002 after it was divested to a non-related party.
14	Bakrie Group	Menthobi Mitra Lestari	Rapid Response Report 16	Mighty Earth	Divested since 2017
15	Boustead Plantations	Boustead Pelita Kanowit	Rapid Response Report 17	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
16	Bukit Berlian Plantation Group	Ginang Fohu Plantation	Rapid Response Report 17	Mighty Earth	The 5 Ha land clearing was not conducted by Bukit Berlian Plantation Group, the land was illegally encroached and cleared by the communities. Bukit Berlian Plantation Group has already adopted NDPE policy where all their land clearing activities shall be guided by the outcome of HCS/HCV activities.
17	CB Industrial Product Holding (CBIP) / Jhonlin Group:	Kurun Sumber Rezeki/Solar Green Sdn Bhd/	Rapid Response Report 17	Mighty Earth	Both CB Industrial Product Holding and Jhonlin Group are not supplier to Wilmar. With reference to the Earthsight report, the allegations were linked to CBIP- which is not a Wilmar supplier. The allegations attempt to link Wilmar via one of our suppliers to CBIP. Having done a legal review (based on the RSPO definition of groups) on the shareholding structure, we can confirm that our supplier, KKJ and CBIP

Ineligible Grievance

Updated: 5 February 2021

		Kumpulan Kris Jati Sdn Bhd			do not share the same parent company, and are not part of the same group. Although CBIP holds 30% share in KKJ, they do not have management control over the operation of KKJ. In addition, the company group that has management control of KKJ, has no shareholdings in any of CBIP's oil palm operations under CBIP's management control. In fact, KKJ, has at company group level, been very supportive of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) policy implementation, participating actively in our supplier compliance and verification programs. Wilmar has previously conducted ground verification in two mills under the KKJ group since the launch of our NDPE policy in December 2013. Our last visit to a KKJ operation was in May 2019.
18	Dharma Sawit Nusantara Tbk (DSN Group)	Prima Sawit Andalan	Rapid Response Report 17	Mighty Earth	The land clearing was not conducted by DSN as they have a moratorium in place since 2015. The land was illegally encroached and cleared by communities from Dusun Tembaga and Desa Sungai Buluh, for the planting of paddy field. DSN has already reported the case to the local authorities and copies of the reports had also been shared with Wilmar.
19	Incasi Raya	Arvenasepakat	Rapid Response Report 17	Mighty Earth	The land clearing was not conducted by Arvenasepakat, the area was illegally encroached and cleared by communities of Kelompok Sinaga. Police report has been lodged on the illegal encroachment.
20	Kirana Megatara	Putra Katingan Pratama	Rapid Response Report 17	Mighty Earth	Our supplier, Triputra Agro Persada has confirmed that Kirana Megatara is not a supplier to them.
21	RGE Group	Usaha Sawit Unggul	Rapid Response Report 17	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
22	Rimbunan Hijau	Poh Zhen Sdn Bhd	Rapid Response Report 17 , 29	Mighty Earth	The land clearing is not related to oil palm development.

Ineligible Grievance

Updated: 5 February 2021

23	Samling	Syarikat Samling Timber Sdn Bhd (LPF 0014)	Rapid Response Report 17	Mighty Earth	The land clearing is not related to oil palm development. Our last purchase was in January 2020
24	Woodman	Adong estate, part of LPF 0004	Rapid Response Report 17	Mighty Earth	The land clearing is not related to oil palm development
25	Woodman	Liku estate, part of LPF 0004	Rapid Response Report 17	Mighty Earth	The land clearing is not related to oil palm development
26	WTK Group	Southwind Plantation Sdn Bhd	Rapid Response Report 17	Mighty Earth	WTK was not involved in the land clearing. The clearance happened either outside their concession boundary or within " <u>Native Dispute Land</u> " inside their boundary. For illegal clearance within " <u>Native Dispute Land</u> ", police report has already been lodged.
27	Yuwang	Empresa (M) Sdn Bhd	Rapid Response Report 17	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary.
28	GAMA	Sumatera Unggul Makmur	Rapid Response Report 18 , 28	Mighty Earth	Land Clearing was not conducted by the company. This land is not owned and controlled by PT SUM due to Villages Boundary Dispute since 2011. The area in question belongs to the local community, where the land owner cleared it for lady finger and rubber planting. For more detail, please refer to their public statement

Ineligible Grievance

Updated: 5 February 2021

29	KLK Berhad	Menteng Jaya Sawit Perdana	Rapid Response Report 18	Mighty Earth	The alleged area is located within PT MJSP's permit area (Izin lokasi). It is however no longer within the management control of PT MJSP, as in Y2016 the area has been gazetted by Ministry of Environment and Forestry [Kementerian Lingkungan Hidup & Kehutanan "KLHH"] as Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area. A copy of the Ministerial Decree letter [Surat Keputusan Menteri] from KLHH and the location map of the HTR area relative to the alleged area is attached here. It is a local government's development programme for the local community in collaboration with Gabungan Kelompok Tani Hutan ("Gapoktan"), and is monitored by the Forest Agency [Dinas Kehutanan].
30	Pinehill Pacific	Makmur Jaya Malindo	Rapid Response Report 18	Mighty Earth	Not a supplier to Wilmar
31	Rimbunan Hijau	Erajaya Synergy Sdn Bhd (Lassa division, part of LPF/0029)	Rapid Response Report 18	Mighty Earth	Land clearing was reported in several areas based on the RRR 18. While a small portion was cleared for non-palm planting related operation, most of the area was illegally cleared by local communities.
32	Rimbunan Hijau	Woodijaya Sdn Bhd (Lot 197)	Rapid Response Report 18	Mighty Earth	The area in question is an NCR land, where the 4ha clearance was done by communities for the planting of pineapple.
33	Samling	Tunas Borneo Plantation	Rapid Response Report 18 , 27	Mighty Earth	The area in the Report is not within the supplier's concession as their location permit (Izin Lokasi) for that area had expired. Based on the information and photos evidence we received, the area is currently occupied by local communities which has conducted the land clearing. It was also noted that substantial land clearing was conducted by a mining company operating in the area. Our last purchase was in January 2020.

Ineligible Grievance

Updated: 5 February 2021

34	TH Plantations Bhd	TH Pelata Meludam Sdn Bhd	Rapid Response Report 18	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary.
35	Tradewinds	Trans Kenyaland Sdn Bhd	Rapid Response Report 18	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary.
36	Woodman Group	Baram Estate	Rapid Response Report 18	Mighty Earth	The land clearing is not related to oil palm development.
37	AlamBumi Group	AlamBumi Sdn Bhd	Rapid Response Report 19	Mighty Earth	The concession in question doesn't belong to our supplier, AlamBumi. <i>Remarks: This case has been removed from the latest version Rapid Response Report 19</i>
38	Rimbunan Hijau	RH Plantation (Selangor Estate)	Rapid Response Report 19	Mighty Earth	The land clearing is not related to oil palm development.
39	Samuel International Group	Bina Sarana Sawit Utama	Rapid Response Report 19	Mighty Earth	The area in question is outside PT Bina Sarana Sawit Utama's concession boundary.
40	Sime Darby	Sime Darby Plantation Sdn Bhd	Rapid Response Report 19	Mighty Earth	The area in question is outside Derawan estate's concession boundary
41	Dharma Satya Nusantara (DSN)	Putra Utama Lestari (area 1)	Rapid Response Report 20	Mighty Earth	The area in question is outside PT Putra Utama Lestari's concession boundary

Ineligible Grievance

Updated: 5 February 2021

42	Dharma Satya Nusantara (DSN)	Putra Utama Lestari (area 2)	Rapid Response Report 20	Mighty Earth	The area in question is outside PT Putra Utama Lestari's concession boundary
43	Felda Global Ventures	Citra Niaga Perkasa	Rapid Response Report 20	Mighty Earth	FGV has imposed a moratorium on land clearing since 2017, no land clearing was carried out since then. The area in question belongs to the local community, where the land owner cleared it for paddy planting
44	GAMA	Agrinusa Persada Mulia	Rapid Response Report 20	Mighty Earth	GAMA has imposed a moratorium on land clearing July 2018, no land clearing was carried out since then. The area in question are outside PT Agrinusa Persada Mulia's HGU concession area. The land clearing was carried out by communities for farming; and by PT. BPUP (Bangun Bina Utama Papua) for road construction where a report clarifying the land clearing activities was published by GAMA: http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf
45	IJM Group	Prima Bahagia Permai	Rapid Response Report 20	Mighty Earth	IJM has imposed a moratorium on land clearing early 2018. No land clearing was carried out at PT Prima Bahagia Permai since then. The area in question is outside PT Prima Bahagia Permai's concession boundary.
46	STH Group	Makmur Bersama Asia	Rapid Response Report 20	Mighty Earth	The area in question is outside PT Makmur Bersama Asia concession boundary.
47	Surya Dumai	Kalimantan Agro Kencana	Rapid Response Report 20	Mighty Earth	Surya Dumai is not a supplier to Wilmar. Our supplier, First Resources has clarified that Surya Dumai Group is not part of First Resources. First Resources's controlling shareholder does not have any ownership or hold any management roles in SDG. You may refer this link http://www.firstresources.com/upload/file/20190917/20190917012425_32851.pdf which shows all the mills and refineries of First Resources.

Ineligible Grievance

Updated: 5 February 2021

48	BBC Holdings Sdn Bhd	Almanbumi Plantations Sdn Bhd	Rapid Response Report 21 , 23	Mighty Earth	Not a supplier to Wilmar.
49	Dhanista Surya Nusantara	Sabhantara Rawi Sentosa	Rapid Response Report 21	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary.
50	First Resources	Ketapang Agro Lestari	Rapid Response Report 21	Mighty Earth	HCS/HCV assessment has been duly conducted prior the land clearing. The land development was guided by the outcome of the HCV/HCS assessment. No HCV/HCS area has been cleared.
51	Global Enterprise Sdn Bhd	Bulungan Surya Mas Pratama	Rapid Response Report 21	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary.
52	Makin Group	Cipta Karsa Kahuripan	Rapid Response Report 21	Mighty Earth	Concession in question does not belong to Makin Group, as their location permit expired for more than 10 years.
53	Rimbunan Hijau	Simunjan Estate	Rapid Response Report 21	Mighty Earth	Land clearing was not done by the company, it was illegal encroachment by surrounding communities.
54	Rimbunan Hijau	Timrest Sdn Bhd	Rapid Response Report 21	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
55	Teladan	Teladan Palma Perkasa	Rapid Response Report 21	Mighty Earth	The concession in question does not belong to Teladan Group, as their location permit expired for more than 2 years. No activities were carried by Teladan Group since 2016.
56	TSH Resources Bhd (TSH)	Bulungan Citra Agro Persada	Rapid Response Report 21	Mighty Earth	TSH has commissioned Malaysian Environmental Consultants (MEC) to verify the allegation. Where it was concluded that the land use change was caused by fire spread into the concession from neighbouring area. As a RSPO member, TSH strictly adhered to no burn policy, and do not use fire for their land clearing activities.

Ineligible Grievance

Updated: 5 February 2021

57	Agro Sarimas Group	Agro Sarimas Indonesia	Rapid Response Report 22	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
58	Bumitama Group	Damai Agro Sejahtera	Rapid Response Report 22 , 23	Mighty Earth	The area in question in PT Damai Agro Sejahtera (DAS) was not cleared by the company but impacted by forest fires that struck the landscape of Sungai Putri forest during the peak of the dry season in September 2019. While the change in vegetation colour from the satellite imagery may seem as a result of land-clearing, the ground-truthing check identified varied extent of damage, from apparently un-impacted to scorched and burned vegetation. Bumitama is conducting internal investigation to identify the causes and prevent repeated occurrences of fires in the future. for more info please refer to a news release on this matter published on Bumitama's website: http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7dcfe985a
59	Eagle High Plantations Tbk	Arrtu Energie Resources	Rapid Response Report 22	Mighty Earth	The area in question in PT Arrtu Energie Resources (AER) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. Fire outside PT AER's concession area has spread into their concession and caused the fire in PT AER during the dry period.
60	Fangiono Agro Plantation (FAP Agri)	Tirta Madu Sawit Jaya	Rapid Response Report 22 , 24 , 25	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary. FAP Agri has also published their NDPE policy in October 2019.
61	Goodhope Group	Rim Capital	Rapid Response Report 22	Mighty Earth	Goodhope has no plan to carry out any new plantings at PT RIM Capital, the company has not conducted any land clearance at Rim capital since 2012. The area in question (-2.661, 112,231) is located outside of RIM Capital's concession. While another area (-2.689, 112.227) belongs to the communities, where the landowners have no intent to relinquish their land to the company.

Ineligible Grievance

Updated: 5 February 2021

62	Kalimantan Sawit Kusama	Fajar Saudara Lestari	Rapid Response Report 22	Mighty Earth	The area in question in Fajar Saudara Lestari (PT FSL) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. Fire outside PT FSL concession area has spread into their concession and cause the fire in PT FSL during the dry period.
63	Sampoerna Agro	Usaha Agro Indonesia	Rapid Response Report 22	Mighty Earth	Land clearing was not conducted by the company. The area in question belongs to community, where the landowners have no intent to relinquish their land to the company.
64	BEST Group	Menara Tunggal Perkasa	Rapid Response Report 23	Mighty Earth	Not a supplier to Wilmar. Wilmar has suspended PT BEST at group level since 2017.
65	Bumitama Group	Andalan Sukses Makmur	Rapid Response Report 23	Mighty Earth	Our supplier has conducted ground checking and verified that this is not a result of land clearing but a fire scar from forest fires that occurred in the area in September 2019. These areas which are owned by the local community and thus enclaved from the management of the company are a part of the set-aside areas of 2,500 hectares (about 36% of PT ASMR's permit) that were excluded from the company plantation development plans and were set-aside for conservation based on the rapid HCS assessment and peat delineation study conducted in April 2014 (refer to 12 September 2014. Announcement: http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7). Upon reporting by the patrolling team, the fires were tackled by our supplier's fire-response personnel. Two teams of 24 men were dispatched to the site, equipped with pumps and water hoses to douse the flames. However, the forest terrain, lack of access roads and peat soil made it very difficult extinguish. Once put out, both incidents were recorded and reported accordingly to relevant local authorities, as well as to the RSPO under the hotspot monitoring scheme.

Ineligible Grievance

Updated: 5 February 2021

66	Incasi Raya Group	Makmur Agro Lestari	Rapid Response Report 23	Mighty Earth	This concession doesn't belong to Incasi Raya. MAL is located in West Kalimantan while the location of this report is located in Central Kalimantan.
67	NPC Resources	Sumber Alam Selaras	Rapid Response Report 23 , 25	Mighty Earth	The area in question in Sumber Alam Selaras was not cleared by the company but impacted by forest fires that struck during the peak of the dry season in September 2019.
68	Puncak Niaga Holdings Bhd	Danum Sinar Sdn Bhd	Rapid Response Report 23	Mighty Earth	Not a supplier to Wilmar. We do not source from Puncak Niaga Holdings Bhd, Danum Sinar Sdn Bhd, nor Sarawak Oil Palms.
69	Union Sampoerna Triputra Persada	Harapan Hibrida Kalbar	Rapid Response Report 23	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
70	Samling Group	LPF 008/Merudi & Batu Belah	Rapid Response Report 24 , 25 , 26	Mighty Earth	Not a supplier to Wilmar. Wilmar has suspended Samling at group level and our last purchase was in January 2020.
71	CB Industrial Product Holdings	Sawit Lamandau Raya	Rapid Response Report 26	Mighty Earth	Not a supplier to Wilmar.
72	CB Industrial Product Holdings	Jaya Jadi Utama	Rapid Response Report 26	Mighty Earth	Not a supplier to Wilmar.
73	Teladan Prima Group	Tanjung Buyu Perkasa Plantation	Rapid Response Report 26	Mighty Earth	Land clearing was not conducted by the company. Based on the concession map we received from supplier, it was verified that the land clearing happened outside their concession boundary.

Ineligible Grievance

Updated: 5 February 2021

74	Ciliandry Anky Abadi (CAA)	Agrindo Green Lestari	Rapid Response Report 27	Mighty Earth	Not a supplier to Wilmar. Wilmar has ceased sourcing from CAA at group level since March 2018.
75	QL Resources	Pipit Mutiara Indah	Rapid Response Report 27, 28	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
76	Rimbunan Hijau	PJP Pelita Lundu Plantation Sdn Bhd	Rapid Response Report 29	Mighty Earth	The land clearing was not conducted by the company. That particular area (LOT N17) is still owned by the local smallholders as it has not been surrendered yet. The land clearing was done by those local smallholders.
77	Perbadanan Kemajuan Negeri Pahang (PKNP)	PKNP Tembeling	Rapid Response Report 30, 31	Mighty Earth	PKNP is not a supplier to Wilmar Based on the RSPO's definition of group ownership (refer here and here), a review of ownership documentation and shareholdings found that PKNP is not related at group level to Wilmar supplier, LKPP Corporation Sdn Bhd.