<table>
<thead>
<tr>
<th>No</th>
<th>Group</th>
<th>Concession</th>
<th>Grievance Report</th>
<th>Stakeholder</th>
<th>Investigation Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Anglo Eastern Plantations</td>
<td>Kahayan Agro Plantation</td>
<td>Rapid Response Report 14, 15, 24, 25</td>
<td>Mighty Earth</td>
<td>Anglo Eastern has already submitted the HCS report for peer review and land clearing identified is located outside the identified HCS area.</td>
</tr>
<tr>
<td>2.</td>
<td>Widya Corporation</td>
<td>Mulia Inti Perkasa</td>
<td>Rapid Response Report 15, 25, 29</td>
<td>Mighty Earth</td>
<td>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.</td>
</tr>
<tr>
<td>3.</td>
<td>Fangiono Agro Plantation Group (FAP Agri)</td>
<td>Ketapang Hijau Lestari</td>
<td>Rapid Response Report 9</td>
<td>Mighty Earth</td>
<td>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.</td>
</tr>
<tr>
<td>4.</td>
<td>Mulia Sawit</td>
<td>Persada Era Agro Kencana</td>
<td>Rapid Response Report 9, 10, 11, 12, 15, 25</td>
<td>Mighty Earth</td>
<td>Not a supplier to Wilmar</td>
</tr>
<tr>
<td>5.</td>
<td>Incasi Raya Group</td>
<td>Sumatera Jaya Agro Lestari</td>
<td>Rapid Response Report 10</td>
<td>Mighty Earth</td>
<td>SJAL has already conducted HCS and HCV since 2017. Their land clearing is guided by the outcome of the assessments.</td>
</tr>
<tr>
<td>6.</td>
<td>Samling</td>
<td>Lana LPF 0006</td>
<td>Rapid Response Report 13, 15</td>
<td>Mighty Earth</td>
<td>The land clearing is not related to oil palm development. Our last purchase was in January 2020</td>
</tr>
<tr>
<td>No.</td>
<td>Group Name</td>
<td>Company Name</td>
<td>Response Report</td>
<td>Source</td>
<td>Details</td>
</tr>
<tr>
<td>-----</td>
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</tr>
<tr>
<td>7.</td>
<td>Rimbunan Hijau Group</td>
<td>Jaya Tiasa Holdings Berhad</td>
<td>Rapid Response</td>
<td>mighty-earth</td>
<td>The land clearing is not related to oil palm development</td>
</tr>
<tr>
<td>8.</td>
<td>Triputra Group</td>
<td>Dwiwira Lestari Jaya</td>
<td>Rapid Response</td>
<td>mighty-earth</td>
<td>HCV 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.</td>
</tr>
<tr>
<td>9.</td>
<td>Samling</td>
<td>LPF/0008 Marudi &amp; Batu Belah</td>
<td>Rapid Response</td>
<td>mighty-earth</td>
<td>The land clearing is not related to oil palm development. Our last purchase was in January 2020</td>
</tr>
<tr>
<td>10.</td>
<td>Borneo Pacific</td>
<td>Arjuna Utama Sawit</td>
<td>Rapid Response</td>
<td>mighty-earth</td>
<td>Arjuna Utama Sawit is not a supplier to Wilmar</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Report</td>
<td></td>
<td>Our supplier, Borneo Pacific does not have any oil palm operation in Indonesia</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>13</td>
<td></td>
<td><a href="https://www.borneopac.com/plantation.html">https://www.borneopac.com/plantation.html</a></td>
</tr>
<tr>
<td>11.</td>
<td>TH Plantations Berhad</td>
<td>Hydroflow</td>
<td>Rapid Response</td>
<td>mighty-earth</td>
<td>Land Clearing was not conducted by the company, it happened outside their concession boundary</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Report</td>
<td></td>
<td>14, 18, 23, 27</td>
</tr>
<tr>
<td>No.</td>
<td>Company Name</td>
<td>Land Description</td>
<td>Rapid Response Report Numbers</td>
<td>Responsible Party</td>
<td>Notes</td>
</tr>
<tr>
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</tr>
<tr>
<td>12</td>
<td>Perkebunan Nusantara</td>
<td>Perkebunan Nusantara II</td>
<td>Rapid Response Report 15</td>
<td>Mighty Earth</td>
<td>Divested since 2014</td>
</tr>
<tr>
<td>13</td>
<td>Samling</td>
<td>Samling Jelalong LPF 0007</td>
<td>Rapid Response Report 15</td>
<td>Mighty Earth</td>
<td>The land clearing is not related to oil palm development. Our last purchase was in January 2020.</td>
</tr>
<tr>
<td>14</td>
<td>Ta Ann Holdings Bhd</td>
<td>Ladang Selezu</td>
<td>Rapid Response Report 15, 16</td>
<td>Mighty Earth</td>
<td>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.</td>
</tr>
<tr>
<td>15</td>
<td>TH Plantations Berhad</td>
<td>Ladang Tabung Haji</td>
<td>Rapid Response Report 15, 18, 20</td>
<td>Mighty Earth</td>
<td>This concession doesn’t belong to TH Plantations Berhad since 2002 after it was divested to a non-related party.</td>
</tr>
<tr>
<td>16</td>
<td>Bakrie Group</td>
<td>Menthobi Mitra Lestari</td>
<td>Rapid Response Report 16</td>
<td>Mighty Earth</td>
<td>Divested since 2017</td>
</tr>
<tr>
<td>17</td>
<td>Boustead Plantations</td>
<td>Boustead Pelita Kanowit</td>
<td>Rapid Response Report 17</td>
<td>Mighty Earth</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
</tr>
</tbody>
</table>
### Ineligible Grievance

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<table>
<thead>
<tr>
<th>No.</th>
<th>Supplier/Group</th>
<th>Allegation</th>
<th>Rapid Response Report</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>18.</td>
<td>Bukit Berlian Plantation Group</td>
<td>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 <strong>NDPE policy</strong> where all their land clearing activities shall be guided by the outcome of HCS/HCV activities.</td>
<td>Report 17</td>
<td>Mighty Earth</td>
</tr>
<tr>
<td>19.</td>
<td>CB Industrial Product Holding (CBIP)/Jhonlin Group: Kurun Sumber Rezeki/Solar Green Sdn Bhd/Kumpulan Kris Jati Sdn Bhd</td>
<td>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 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.</td>
<td>Report 17</td>
<td>Mighty Earth</td>
</tr>
<tr>
<td>20.</td>
<td>Dharma Sawit Nusantara (DSN Group) Prima Sawit Andalan</td>
<td>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.</td>
<td>Report 17</td>
<td>Mighty Earth</td>
</tr>
<tr>
<td>No.</td>
<td>Company</td>
<td>Land Area Description</td>
<td>Response Report</td>
<td>Source</td>
</tr>
<tr>
<td>-----</td>
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</tr>
<tr>
<td>21.</td>
<td>Incasi Raya Arvenasepakat</td>
<td>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.</td>
<td>Mighty Earth</td>
<td>17</td>
</tr>
<tr>
<td>22.</td>
<td>Kirana Megatara Putra Katingan Pratama</td>
<td>Our supplier, Triputra Agro Persada has confirmed that Kirana Megatara is not a supplier to them.</td>
<td>Mighty Earth</td>
<td>17</td>
</tr>
<tr>
<td>23.</td>
<td>RGE Group Usaha Sawit Unggul</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
<td>Mighty Earth</td>
<td>17</td>
</tr>
<tr>
<td>24.</td>
<td>Rimbunan Hijau Group Poh Zhen Sdn Bhd</td>
<td>The land clearing is not related to oil palm development.</td>
<td>Mighty Earth</td>
<td>17, 29</td>
</tr>
<tr>
<td>25.</td>
<td>Samling Syarikat Samling Timber Sdn Bhd (LPF 0014)</td>
<td>The land clearing is not related to oil palm development. Our last purchase was in January 2020</td>
<td>Mighty Earth</td>
<td>17</td>
</tr>
<tr>
<td>26.</td>
<td>Woodman Adong estate, part of LPF 0004</td>
<td>The land clearing is not related to oil palm development.</td>
<td>Mighty Earth</td>
<td>17</td>
</tr>
<tr>
<td>27.</td>
<td>Woodman Liku estate, part of LPF 0004</td>
<td>The land clearing is not related to oil palm development.</td>
<td>Mighty Earth</td>
<td>17</td>
</tr>
<tr>
<td>28.</td>
<td>WTK Group Southwind Plantation Sdn Bhd</td>
<td>WTK was not involved in the land clearing. The clearance happened either outside their concession boundary or within &quot;Native Dispute Land&quot; inside their boundary. For illegal clearance within &quot;Native Dispute Land&quot;, police report has already been lodged.</td>
<td>Mighty Earth</td>
<td>17</td>
</tr>
<tr>
<td>Ineligible Grievance</td>
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</table>

<table>
<thead>
<tr>
<th>No.</th>
<th>Company (Group)</th>
<th>Entity</th>
<th>Rapid Response Report</th>
<th>Mighty Earth</th>
<th>Note</th>
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</thead>
<tbody>
<tr>
<td>29.</td>
<td>Yuwang Empresa (M) Sdn Bhd</td>
<td>Rapid Response Report 17</td>
<td>Mighty Earth</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
<td></td>
</tr>
<tr>
<td>30.</td>
<td>GAMA Sumatera Unggul Makmur</td>
<td>Rapid Response Report 18, 28</td>
<td>Mighty Earth</td>
<td>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</td>
<td></td>
</tr>
<tr>
<td>31.</td>
<td>KLK Berhad Menteng Jaya Sawit Perdana</td>
<td>Rapid Response Report 18</td>
<td>Mighty Earth</td>
<td>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 &amp; 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].</td>
<td></td>
</tr>
<tr>
<td>32.</td>
<td>Pinehill Pacific Makmur Jaya Malindo</td>
<td>Rapid Response Report 18</td>
<td>Mighty Earth</td>
<td>Not a supplier to Wilmar</td>
<td></td>
</tr>
<tr>
<td>33.</td>
<td>Rimbunan Hijau Group Erajaya Synergy Sdn Bhd (Lassa division, part of LPF/0029)</td>
<td>Rapid Response Report 18</td>
<td>Mighty Earth</td>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>
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<table>
<thead>
<tr>
<th>No.</th>
<th>Company Name</th>
<th>Location Details</th>
<th>Responsible Party</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>34.</td>
<td>Rimbunan Hijau Group</td>
<td>Woodijaya Sdn Bhd (Lot 197)</td>
<td>Mighty Earth</td>
<td>The area in question is an NCR land, where the 4ha clearance was done by communities for the planting of pineapple.</td>
</tr>
<tr>
<td>35.</td>
<td>Samling</td>
<td>Tunas Borneo Plantation</td>
<td>Mighty Earth</td>
<td>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.</td>
</tr>
<tr>
<td>36.</td>
<td>TH Plantations Bhd</td>
<td>TH Pelata Meludam Sdn Bhd</td>
<td>Mighty Earth</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
</tr>
<tr>
<td>37.</td>
<td>Tradewinds</td>
<td>Trans Kenyaland Sdn Bhd</td>
<td>Mighty Earth</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
</tr>
<tr>
<td>38.</td>
<td>Woodman Group</td>
<td>Baram Estate</td>
<td>Mighty Earth</td>
<td>The land clearing is not related to oil palm development.</td>
</tr>
<tr>
<td>39.</td>
<td>AlamBumi Group</td>
<td>AlamBumi Sdn Bhd</td>
<td>Mighty Earth</td>
<td>The concession in question doesn’t belong to our supplier, AlamBumi. Remarks: This case has been removed from the latest version Rapid Response Report 19</td>
</tr>
<tr>
<td>40.</td>
<td>Rimbunan Hijau Group</td>
<td>RH Plantation (Selangor Estate)</td>
<td>Mighty Earth</td>
<td>The land clearing is not related to oil palm development.</td>
</tr>
</tbody>
</table>
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<thead>
<tr>
<th>No.</th>
<th>Company Name</th>
<th>Area Name</th>
<th>Report Reference</th>
<th>Responsible Entity</th>
<th>Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>43.</td>
<td>NT Corp</td>
<td>Bintang Sakti Lenggana</td>
<td>Rapid Response Report 19</td>
<td>Mighty Earth</td>
<td>There’s no deforestation carried out in the area identified in the report. The land clearing was conducted in area consisted of mixed agriculture land, mostly consists of rubber trees.</td>
</tr>
<tr>
<td>44.</td>
<td>Dharma Satya Nusantara Tbk (DSN)</td>
<td>Putra Utama Lestari (area 1)</td>
<td>Rapid Response Report 20</td>
<td>Mighty Earth</td>
<td>The area in question is outside PT Putra Utama Lestari’s concession boundary.</td>
</tr>
<tr>
<td>46.</td>
<td>Felda Global Ventures</td>
<td>Citra Niaga Perkasa</td>
<td>Rapid Response Report 20</td>
<td>Mighty Earth</td>
<td>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.</td>
</tr>
<tr>
<td>47.</td>
<td>GAMA</td>
<td>Agrinusa Persada Mulia</td>
<td>Rapid Response Report 20</td>
<td>Mighty Earth</td>
<td>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: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf</a></td>
</tr>
<tr>
<td>No.</td>
<td>Group Name</td>
<td>Company Name</td>
<td>Rapid Response Report</td>
<td>Source</td>
<td>Note</td>
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</tr>
<tr>
<td>48</td>
<td>IJM Group</td>
<td>Prima Bahagia Permai</td>
<td>Report 20</td>
<td>Mighty Earth</td>
<td>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.</td>
</tr>
<tr>
<td>49</td>
<td>STH Group</td>
<td>Makmur Bersama Asia</td>
<td>Report 20</td>
<td>Mighty Earth</td>
<td>The area in question is outside PT Makmur Bersama Asia concession boundary.</td>
</tr>
<tr>
<td>50</td>
<td>Surya Dumai</td>
<td>Kalimantan Agro Kencana</td>
<td>Report 20</td>
<td>Mighty Earth</td>
<td>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 <a href="http://www.firstresources.com/upload/file/20190917/20190917012425_32851.pdf">http://www.firstresources.com/upload/file/20190917/20190917012425_32851.pdf</a> which shows all the mills and refineries of First Resources.</td>
</tr>
<tr>
<td>51</td>
<td>BBC Holdings Sdn Bhd</td>
<td>Almanbumi Plantations Sdn Bhd</td>
<td>Report 21, 23</td>
<td>Mighty Earth</td>
<td>Not a supplier to Wilmar.</td>
</tr>
<tr>
<td>52</td>
<td>Dhanista Surya Nusantara</td>
<td>Sabhantara Rawi Sentosa</td>
<td>Report 21</td>
<td>Mighty Earth</td>
<td>Land Clearing was not conducted by the company, it happened outside their concession boundary.</td>
</tr>
<tr>
<td>53</td>
<td>First Resources</td>
<td>Ketapang Agro Lestari</td>
<td>Report 21</td>
<td>Mighty Earth</td>
<td>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.</td>
</tr>
<tr>
<td>54</td>
<td>Global Enterprise Sdn Bhd</td>
<td>Bulungan Surya Mas Pratama</td>
<td>Report 21</td>
<td>Mighty Earth</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>No.</th>
<th>Company Name</th>
<th>Concession Name</th>
<th>Rapid Response Report</th>
<th>Mighty Earth</th>
</tr>
</thead>
<tbody>
<tr>
<td>55</td>
<td>Makin Group</td>
<td>Cipta Karsa Kahuripan</td>
<td>Report 21</td>
<td>Concession in question does not belong to Makin Group, as their location permit expired for more than 10 years.</td>
</tr>
<tr>
<td>56</td>
<td>Rimbunan Hijau Group</td>
<td>Simunjan Estate</td>
<td>Report 21</td>
<td>Land clearing was not done by the company, it was illegal encroachment by surrounding communities.</td>
</tr>
<tr>
<td>57</td>
<td>Rimbunan Hijau Group</td>
<td>Timrest Sdn Bhd</td>
<td>Report 21</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
</tr>
<tr>
<td>58</td>
<td>Teladan</td>
<td>Teladan Palma Perkasa</td>
<td>Report 21</td>
<td>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.</td>
</tr>
<tr>
<td>59</td>
<td>TSH Resources Bhd (TSH)</td>
<td>Bulungan Citra Agro Persada</td>
<td>Report 21</td>
<td>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.</td>
</tr>
<tr>
<td>60</td>
<td>Agro Sarimas Group</td>
<td>Agro Sarimas Indonesia</td>
<td>Report 22</td>
<td>Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
</tr>
<tr>
<td>61</td>
<td>Bumitama Group</td>
<td>Damai Agro Sejahtera</td>
<td>Report 22, 23</td>
<td>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</td>
</tr>
</tbody>
</table>
### Investigation to Identify the Causes and Prevent Repeated Occurrences of Fires in the Future

For more info, please refer to a news release on Bumitama’s website:


<table>
<thead>
<tr>
<th>No.</th>
<th>Company Name</th>
<th>Quick Response Report</th>
<th>Mighty Earth</th>
<th>Notes</th>
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<tr>
<td>62.</td>
<td>Eagle High Plantations</td>
<td>Arrtu Energie Resources</td>
<td>Rapid Response Report 22</td>
<td>Mighty Earth</td>
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<tr>
<td>63.</td>
<td>Fangjiong Agro Plantation (FAP Agri)</td>
<td>Tirta Madu Sawit Jaya</td>
<td>Rapid Response Report 22, 24, 25</td>
<td>Mighty Earth</td>
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<tr>
<td>64.</td>
<td>Goodhope Group</td>
<td>Rim Capital</td>
<td>Rapid Response Report 22</td>
<td>Mighty Earth</td>
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<tr>
<td>65.</td>
<td>Kalimantan Sawit Kusama Lestari</td>
<td>Fajar Saudara Lestari</td>
<td>Rapid Response Report 22</td>
<td>Mighty Earth</td>
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<tr>
<td>66.</td>
<td>Sampoerna Agro Indonesia</td>
<td>Usaha Agro Indonesia</td>
<td>Rapid Response Report 22</td>
<td>Mighty Earth</td>
</tr>
<tr>
<td>No.</td>
<td>Company Name</td>
<td>Location</td>
<td>Rapid Response Report</td>
<td>Mighty Earth</td>
</tr>
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</tr>
<tr>
<td>67.</td>
<td>BEST Group</td>
<td>Menara Tunggal Perkasa</td>
<td>[23]</td>
<td>Not a supplier to Wilmar. Wilmar has suspended PT BEST at group level since 2017.</td>
</tr>
<tr>
<td>68.</td>
<td>Bumitama Group</td>
<td>Andalan Sukses Makmur</td>
<td>[23]</td>
<td>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: <a href="http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7">http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7</a>). 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.</td>
</tr>
<tr>
<td>69.</td>
<td>Incasi Raya</td>
<td>Makmur Agro Lestari</td>
<td>[23]</td>
<td>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.</td>
</tr>
<tr>
<td>70.</td>
<td>NPC Resources</td>
<td>Sumber Alam Selaras</td>
<td>[23, 25]</td>
<td>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.</td>
</tr>
<tr>
<td>Ineligible Grievance</td>
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<td>Updated: 13 June 2022</td>
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</tbody>
</table>

<p>| 72. | Union Sampoerna Agro 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. |
| 73. | Samling Group | LPF 008/Merudi &amp; 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. |
| 74. | CB Industrial Product Holdings | Sawit Lamandau Raya | Rapid Response Report 26 | Mighty Earth | Not a supplier to Wilmar. |
| 75. | CB Industrial Product Holdings | Jaya Jadi Utama | Rapid Response Report 26 | Mighty Earth | Not a supplier to Wilmar. |
| 76. | 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. |
| 77. | 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. |
| 78. | 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. |</p>
<table>
<thead>
<tr>
<th>No.</th>
<th>Company Name</th>
<th>Plantation Name</th>
<th>Rapid Response Report</th>
<th>Mighty Earth Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>79</td>
<td>Rimbunan Hijau Group</td>
<td>PJP Pelita Lundu Plantation Sdn Bhd</td>
<td>Report 29</td>
<td>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.</td>
</tr>
</tbody>
</table>
| 80  | Perbadanan Kemajuan Negeri Pahang (PKNP) | PKNP Tembeling                           | 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. |
| 81  | Yayasan Pelajaran Johor           | YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara) | Report 32             | Mighty Earth                                                                                                     Total concession area of Sungai Ara is less than 90ha, where the entire concession was largely cleared prior to 2019. The remaining area of less than 5 ha which was developed in January 2019 is a combination of mixed scrub with pioneer species. There was no further land clearing post January 2019. Since the case was brought to YPJ’s attention in January 2020, they have immediately developed a NDPE policy to demonstrate their commitment to adopt NDPE to guide their future development. |
| 82  | Astra Agro Lestari                | Agincourt Resources                      | Report 33, 36         | Mighty Earth                                                                                                     PT Agincourt Resources is a not a supplier to Wilmar. They have no activities in oil palm industry. The land clearing at PT Agincourt Resources is not related to oil palm development. PT AAL and PT Agincourt Resources are different companies and operate independently as separate legal entities. In addition, we understand that PT AAL has initiated direct communication with Mighty Earth and have linked Mighty Earth with PT Agincourt Resources/ PT United Tractor for further engagement. |
83. **Bumi Gading Prima** | **Bumi Agro Prima** | **Rapid Response Report 33** | **Mighty Earth** | PT Bumi Agro Prima clarified that there was no deforestation taken place as the area was planted with other crops prior converting to palm. Supporting documentation and photos had been submitted to prove their claim, where it was found that the vegetation on the ground consists of mixture of other crops, which is mostly rubber. To ensure that their activities are aligned with the NDPE requirement, the supplier has also agreed to commit to moratorium since May 2021 and engage a license assessor to conduct HCV-HCS assessment.

84. **Eagle High Plantations** | **Tandan Sawita Papua** | **Rapid Response Report 34** | **Mighty Earth** | Prior to the publication of the Rapid Response Report 34 on 30 June 2021 on the allegation of deforestation at PT Tandan Sawita Papua (TSP), Wilmar has already initiated engagement with PT TSP when we detected the issue through our internal monitoring programme. The land clearing detected was not conducted by PT TSP. Eagle High, their parent company is a member of RSPO since 2008 and they have also published their NDPE policy since 2018. Their land development is therefore being guided by the RSPO P&C as well as NDPE policy requirement. PT TSP carried out a site visit to investigate the allegation, the report is available [here](#). Based on the outcome of the investigation, it appeared that the land clearing was conducted by villagers in the area without PT TSP’s consent. The community members claimed that they are unaware that the area belongs to PT TSP. PT TSP has therefore conducted socialisation and engagement with the local communities and managed to secure their commitment in stopping the illegal land clearance inside PT TSP. PT TSP has also engaged with local authorities, including Arso Timur District Government and Keerom Regency Government on the said issue, where the local authority has agreed to hold further meeting with the community leaders to provide clarity on the PT TSP boundary. In the meantime, PT TSP will put up signboard in the area to notify external party on the ownership of PT TSP in the area.
<table>
<thead>
<tr>
<th>No.</th>
<th>Company Name</th>
<th>LPF Number</th>
<th>Rapid Response Report</th>
<th>Mighty Earth Returns</th>
<th>Details</th>
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<tbody>
<tr>
<td>85</td>
<td>Rimbunan Hijau Group</td>
<td>LPF 0026</td>
<td>Rapid Response Report 34</td>
<td>Mighty Earth</td>
<td>The land clearing is not related to oil palm development</td>
</tr>
<tr>
<td>86</td>
<td>Triputra Agro Persada</td>
<td>Brahma Binabakti</td>
<td>Rapid Response Report 34</td>
<td>Mighty Earth</td>
<td>The land clearing happened outside of PT Brahma Binabakti’s concession boundary. For more detail, please refer to Triputra Agro Persada’s official response <a href="#">here</a>.</td>
</tr>
<tr>
<td>87</td>
<td>Bukit Asam Bumi Sawindo Permai</td>
<td></td>
<td>Rapid Response Report 35</td>
<td>Mighty Earth</td>
<td>PT Bumi Sawindo Permai clarified that there was no deforestation taken place as the area was planted with other crops prior converting to palm. Supporting documentation including field verification report and photos had been submitted to prove their claim, where it was found that the vegetation on the ground consists of mixture of other crops, which is mostly rubber and coffee. To ensure that their activities are aligned with the NDPE requirement, the supplier has also agreed to commit to moratorium. Relevant assessments will have to be carried out prior resuming their land clearing to ensure their compliance to NDPE.</td>
</tr>
<tr>
<td>88</td>
<td>Shin Yang</td>
<td>LPF 0019</td>
<td>Rapid Response Report 35</td>
<td>Mighty Earth</td>
<td>Not a supplier to Wilmar. Wilmar does not have direct trading relationship with Shin Yang and their associated company, Sarawak Oil Palms Bhd (SOP).</td>
</tr>
<tr>
<td>89</td>
<td>Ta Ann holdings Bhd</td>
<td>LPF 0010</td>
<td>Rapid Response Report 35</td>
<td>Mighty Earth</td>
<td>The land clearing is not related to oil palm development</td>
</tr>
<tr>
<td>90</td>
<td>Innoprise Plantation Berhad</td>
<td>Innoprise Plantation Berhad</td>
<td>Rapid Response Report 36</td>
<td>Mighty Earth</td>
<td>Wilmars initiated an investigation on the Innoprise case since August 2020, and the investigation concluded that the land development was not related to their oil palm operations. Their land development activities were related to timber tree planting, mainly the timber species Laran (<em>Neolamarckia cadamba</em>). During the course of</td>
</tr>
</tbody>
</table>
Ineligible Grievance
Updated: 13 June 2022

In investigation, Innoprise has submitted comprehensive documents for our review, including:

- Detailed concession maps showing planting blocks, in shapefile format.
- The Sabah Forestry Department (SFD) approved Annual Work Plans (this is a formal document required to be submitted to SFD annually and shows the planned work in relation to both their timber and oil palm operations)
- Innoprise’s field visit reports, including ground and drone photos of random selected points to show condition on the ground

In November 2021, when Malaysian authorities eased its Covid-19 movement control restrictions, Wilmar deployed a technical team, consisting of conservation, GIS and plantation sustainability experts to carry out field verification. Our team has visited the area to verify the condition on the ground. Drones were deployed for photo/video taking where the area is not easily accessible due to lack of roads. The outcome of our field visit is consistent with Innoprise’s clarification where the area was indeed cleared for Laran tree planting.

|------|---------------------------------|---------------------|--------------------------|--------------|

PT Kencana Alam Permai parent’s group, Dharma Satya Nusantara Tbk (DSN) is a member of RSPO since 2008, where all their land development for palm is bound by RSPO Principles and Criteria. DSN has also made public commitment to NDPE policy where their last land clearing activities was in 2015. Specifically on the case on PT Kencana Alam Permai (KAP), we have initiated engagement with Dharma Satya Nusantara Tbk (DSN) since October 2021 to seek clarification on deforestation alert detected through our internal monitoring programme. PT KAP has carried out field investigation and confirmed that the clearance was carried out by five local communities for
farming, including paddy planting. The area in question has not been surrendered to the company as the local communities are not keen to involve in oil palm development. Therefore, PT KAP does not have full control over the said area. The outcome of the investigation has also been shared with the head village and *endorsed* by the head village accordingly. PT KAP’s official response to the case is available [here](#).

<table>
<thead>
<tr>
<th>92.</th>
<th>Sumber Tani Agung</th>
<th>Sawit Sukses Sejati</th>
<th>Rapid Response Report 39</th>
<th>Mighty Earth</th>
</tr>
</thead>
</table>

PT Sawit Sukses Sejati (SSS) used to supply FFB to our supplier, PT Sumber Tani Agung (STA) but they are no longer a consistent supplier to PT STA after they built their own mill in 2022. There were some ad hoc FFB delivery to STA in 2022 when PT SSS’s mill running into operational issues. When the allegation of deforestation on PT SSS was brought to PT STA’s attention, PT STA has immediately shared the Rapid Response report 39 with PT SSS for investigation. In the meantime, PT STA has ceased sourcing from PT SSS.