

## **Human Rights Defenders Policy**

*(Updated February 2026)*

### ***Purpose:***

Wilmar International Limited (Wilmar) defines “Human Rights Defenders” (HRDs) as individuals or organisations acting peacefully to promote or protect human rights<sup>1</sup>. They include land, environmental and indigenous community defenders; women’s rights and LGBTI activists; unionists and anti-corruption advocates. HRDs may also include local and indigenous communities, non-governmental organisations, inter-governmental organisations, government, legal professionals, journalists, academics, researchers and the private sector.

For Wilmar, this also includes whistleblowers, complainants, community spokespersons and environmental HRDs<sup>2</sup>. Some HRDs may face additional and heightened risks based on their ethnic origin, gender, national origin, age, social class, religion, sexual orientation, gender identity, union membership, political affiliation or disability, which may vary depending on the context in which they operate (e.g. women in indigenous communities, ethnic minority human rights defenders, etc.).

We recognise that the rule of law and civic freedoms such as freedom of speech, freedom of association and freedom to organise are enabling factors for Wilmar to deliver on our human rights commitments. We acknowledge the crucial contribution of HRDs to a healthy civic space in the countries we operate in and therefore support the protection of HRDs acting in good faith in their exercise and defense of fundamental human rights.

We also recognise the important role that HRDs can play in our due diligence and in the monitoring efforts of our supply base as key informants, providing information about adverse impacts on the rights of people which may be affected by our operations or activities of our business relationships, and in the monitoring of the effectiveness of our actions to address human rights risks and issues. We are committed to the peaceful resolution of conflicts and upholding the inherent dignity of all individuals in the conduct of our business operations.

This policy outlines our commitment to respect the rights of HRDs, and to prevent and mitigate associated human rights risks in our business operations and supply chain that would adversely impact such rights.

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<sup>1</sup> We recognise that not all individuals or organisations that fit this description will identify themselves as HRDs.

<sup>2</sup> This is aligned with the RSPO Policy on the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons.

### **Principles:**

This policy follows the principles of the United Nations (UN) Declaration on Human Rights Defenders, Universal Declaration of Human Rights, International Covenant on Civil and Political Rights<sup>3</sup> (ICCPR), International Covenant on Economic, Social and Cultural Rights (ICESCR), UN Declaration on the Rights of Indigenous Peoples (UNDRIP), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, as well as applicable national legislations and regulations. It is also guided by the UN Guiding Principles on Business and Human Rights (UNGPs), Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct and the Roundtable on Sustainable Palm Oil (RSPO) Policy on the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons.

### **Scope:**

The scope of this policy covers Wilmar's global operations, including refineries, mills or plantations we own, manage or invest in, regardless of stake, our subsidiaries, partners (associates and joint ventures), as well as third-party suppliers (at group level), where we expect all our third-party suppliers to uphold the principles and commitments laid out in this policy in their business operations.

### **Our Commitment:**

We do not tolerate threats, harassment, intimidation, the use of violence, retaliation against or interference with the activities of anyone who raises a concern, lodges a complaint, participates in an investigation or whistle blows on activities in our business operations and supply chain, in good faith. This includes, for example, threats and attacks against HRDs, their family group, their communities and organisations, their properties, and their working conditions in any of our global operations and supply chain. These threats and attacks can be physical, psychological, legal (with the intent to silence and intimidate critics), economic and social<sup>4</sup>.

These commitments align with our [No Deforestation, No Peat, No Exploitation \(NDPE\) Policy](#) and human-rights-related policies, and are applicable across our supply chains. Our Human Rights Due Diligence (HRDD) Framework and Grievance Procedures ensure that we can respond and act on parties within our supply chain, found to have abused the rights of HRDs. We further strive to use our voice, individually or collectively, when HRDs are at risk.

Acknowledging that indigenous peoples are among the most vulnerable groups, Wilmar is committed to respecting the demonstrable<sup>5</sup> legal, communal or customary rights of indigenous and local communities as outlined in our NDPE Policy.

Wilmar is committed to strengthening gender equality in our own operations and across our supply chain. As such, we recognise that HRDs who are women or from sexual and/or gender minorities can face greater risks of gender-specific threats and violence.

Wilmar is committed to actively engaging in collaborative efforts to enhance the respect of HRDs' rights across the whole sector. For example, Wilmar contributed to the development of the RSPO's guidance on the Protection of Human Rights Defenders as a member of the RSPO Human Rights Defenders Task Force.

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<sup>3</sup> With reference to Article 19 on the protection of whistleblowing as an aspect of freedom of expression.

<sup>4</sup> Such as but not limited to stigmatisation and defamation, legal harassment (including the use of Strategic Lawsuits Against Public Participation), digital attacks, murders, sexual violence, forced displacement and confinement, surveillance, dismissal.

<sup>5</sup> Indigenous peoples and local communities may have informal or customary rights that are not registered or recognised by the government or national laws. As defined in the RSPO P&C 2018, demonstrable rights are distinguished from spurious claims by direct engagement with local communities, so they have adequate opportunities to justify their claims and are best ascertained through participatory mapping with the involvement of neighbouring communities.

**Implementation:**

Wilmar integrates the protection of HRDs' rights into our HRDD Framework, management and monitoring processes to identify, prevent, mitigate and remediate adverse human rights impacts in our operations and supply chains. We commit to proactive and constructive engagement with HRDs acting in good faith throughout our HRDD processes and in relation to responding to specific grievances raised.

We are committed to the safeguarding of individual identities and confidential information shared by the parties. Where HRDs request for anonymity, such requests shall be respected. Our [Whistleblowing Policy](#)<sup>6</sup> and [Grievance Procedure](#)<sup>7</sup> provide a secure and anonymous channel for raising concerns related to human rights against Wilmar, our subsidiaries, partners or suppliers, ensuring their protection and a thorough investigation of such issues. This ensures that any grievances involving HRDs, whistleblowers and related parties are handled with confidentiality and diligence.

In 2020, we published the No Exploitation Protocol<sup>8</sup> as an addendum to the Grievance Procedure. The protocol clearly outlines our expectations for suppliers to address and resolve grievances related to HRDs, whistleblowers, complainants or community spokespersons, including remediation, corrective actions and group-level systemic change. Non-compliance with this policy will be investigated under the Grievance Procedure.

Wilmar works with a broad range of stakeholders to effectively implement this policy within our operations as well as our external supply chains.

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<sup>6</sup> Allows for internal and external personnel to raise concerns about possible corporate improprieties in confidence and establishes a framework for independent investigations.

<sup>7</sup> The procedure manages grievances raised by any stakeholder with respect to the implementation of Wilmar's NDPE Policy.

<sup>8</sup> [https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-no-exploitation-protocol.pdf?sfvrsn=e2b8c921\\_2](https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-no-exploitation-protocol.pdf?sfvrsn=e2b8c921_2)