

## Human Rights Due Diligence Framework

*(Updated February 2026)*

### 1. Introduction

**Purpose:** Wilmar International Limited (Wilmar) is committed to upholding and respecting internationally recognised human rights across all its operations and supply chains. This Human Rights Due Diligence (HRDD) Framework aims to identify, prevent, mitigate and account for actual and potential adverse human rights impacts that may arise from our business activities. By integrating human rights considerations into the decision-making process, we strive to ensure our operations contribute positively to the communities and environments in which we operate.

**Scope:** This framework covers Wilmar's global operations, including refineries, mills and plantations that we own, manage or invest in, regardless of stake; our subsidiaries, partners (associates and joint ventures) and third-party suppliers (at group level). It is guided by international human rights standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labour Organization's (ILO) Core Conventions, Organisation for Economic Co-operation and Development (OECD) for Responsible Business Conduct, and United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It also aligns with national legislations and industry best practices to ensure a comprehensive human rights due diligence approach that strengthens risk mitigation and stakeholder trust.

### 2. Commitment to Human Rights.

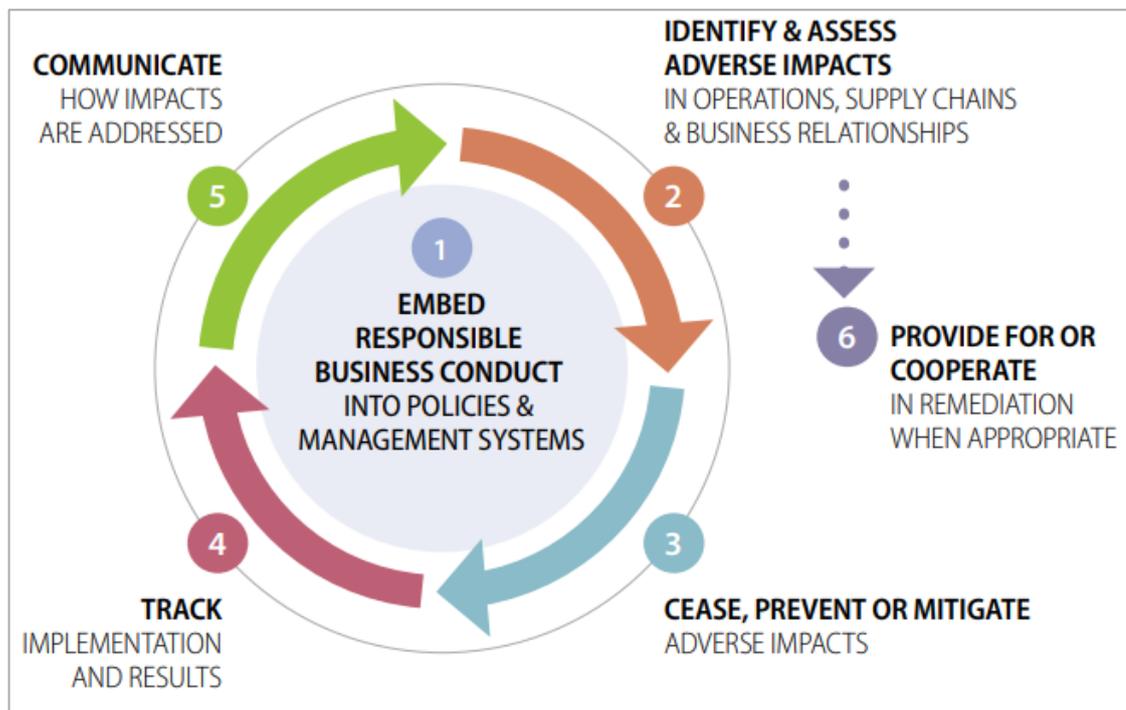
Wilmar is dedicated to upholding the fundamental human rights of individuals detailed in this framework and outlined in our Human Rights Policy. We will work with a broad range of stakeholders to implement this framework within our operations and external supply chains.

This framework is supported by the following:

- Our policies and statements on key human rights aspects, notably:
  - No Deforestation, No Peat, No Exploitation (NDPE) Policy
  - Human Rights Policy
  - Human Rights Defenders Policy
  - Equal Opportunity Policy
  - Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy
  - Child Protection Policy
  - Women's Charter
  - Grievance Procedure
  - Whistleblowing Policy
  - Occupational Health and Safety Policy

A structured HRDD mechanism to identify, prevent, mitigate and account for human rights impacts is based on the OECD six-step approach<sup>1</sup>:

- Step 1: Embed responsible business conduct into policies and management systems
- Step 2: Identify and assess adverse impacts in operations, supply chains and business relationships
- Step 3: Cease, prevent or mitigate adverse impacts
- Step 4: Track implementation and results
- Step 5: Communicate how impacts are addressed
- Step 6: Provide for or cooperate in remediation when appropriate



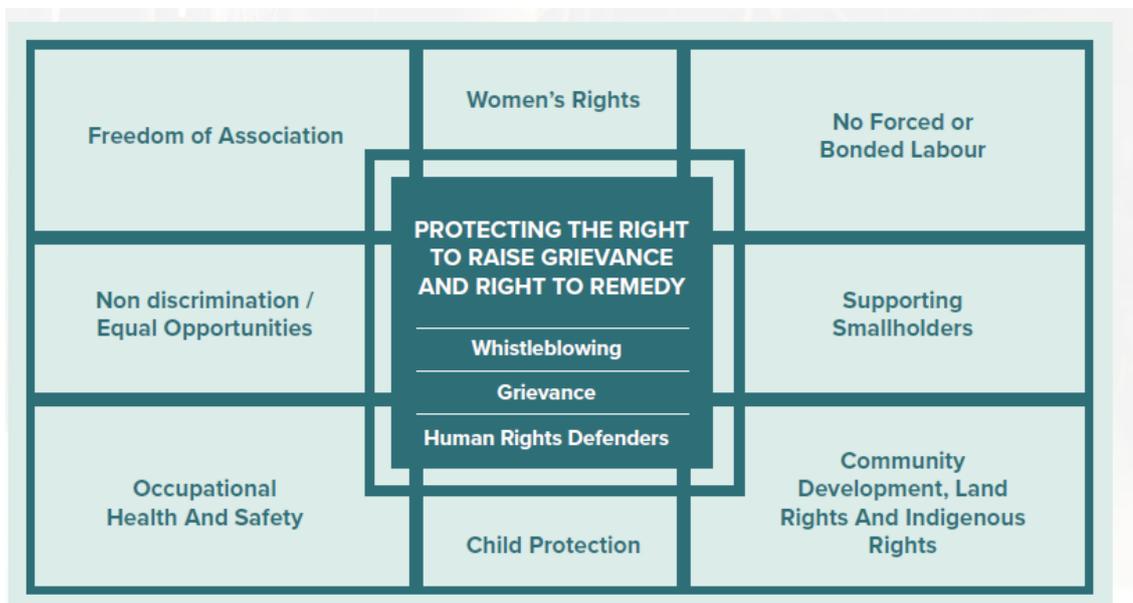
**Figure 1: Due Diligence Process and Supporting Measures**

HRDD is a continuous process and we regularly review our strategies and programmes, including the risk mapping of potential issues, to ensure the effectiveness of our approach. We also regularly engage with external stakeholders, including human rights experts and civil society organisations, to gain a comprehensive understanding of the challenges on the ground and mitigation strategies. In addition, Wilmar also actively participates in joint partnerships and various multi-stakeholder platforms to promote, respect and provide support for human rights.

<sup>1</sup> [https://www.oecd.org/content/dam/oecd/en/publications/reports/2018/02/oecd-due-diligence-guidance-for-responsible-business-conduct\\_c669bd57/15f5f4b3-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2018/02/oecd-due-diligence-guidance-for-responsible-business-conduct_c669bd57/15f5f4b3-en.pdf)

## Key Human Rights Focus Areas

By proactively identifying, assessing and addressing human rights risks, we aim to prevent negative impacts on vulnerable groups such as workers, local communities and indigenous people. Wilmar has identified eight key focus areas for human rights:



**Figure 2: Eight Key Human Rights Focus Areas**

- **No Forced or Bonded Labour**  
We prohibit all forms of forced, trafficked or bonded labour within our operations and supply chain. We are committed to upholding best practices for fair working conditions, including the payment of wages that meet or exceed legal requirements while taking into account reasonable production targets and working hours. Our commitment also extends to key areas such as workplace accident insurance, documented employment contracts, confidentiality, adequate accommodation and access to effective remedies, referenced in the Annex to this framework.
- **Women's Rights**  
Recognising that palm oil operations have traditionally been male-dominated, we are committed to fostering a fair and inclusive workplace for women, acknowledging their valuable contributions and supporting their professional development.  
Through our Women's Charter, we focus on five core areas: protection from harassment and violence, equal opportunities, female health, continuous education and family life balance. Launched in 2019, the Charter underscores our commitment to respecting women's rights and supporting their welfare across all our operations, including plantations, mills and offices.
- **Child Protection**  
Wilmar has zero tolerance for any form of child labour, exploitation or abuse and is committed to protecting and safeguarding the rights and safety of children. In 2017, we launched our Child Protection Policy to further strengthen our commitment and efforts to safeguard the welfare of children living in oil palm plantations with their families. The policy superseded the longstanding No Child Labour Policy, which had been in place since the company's inception.

- *Freedom of Association*

We respect the rights of personnel to form and join trade unions of their choice, and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, parallel means of independent and free association and bargaining should be made available to all such personnel.

- *Occupational Health and Safety*

Wilmar commits to providing a safe and healthy environment for its employees, contractors, clients and visitors in all aspects of its operations.

- *Non-Discrimination and Equal Opportunities*

We actively promote diversity, equity and inclusion (DEI) to cultivate a thriving and inclusive workplace. By embracing both similarities and differences, we empower all employees to reach their full potential. Committed to providing equal opportunities, we ensure non-discrimination in hiring, promotion, retirement, and actively promote employment equality to maintain a diverse and representative workforce.

- *Supporting Smallholders*

We are committed to facilitating the inclusion of smallholders in our supply chain by providing technical assistance, training and resources to help them adopt sustainable practices and boost productivity. Recognising the vital role smallholders play in our value chain, we go beyond transactional relationships by investing in their long-term growth. This includes supporting farmers to enhance yields, access financial aid, pursue industry certifications and ensuring market access for their produce. These efforts are aligned with our broader NDPE commitments and contribute to the sustainable development of smallholders and their communities.

- *Community Development, Land and Indigenous Rights*

Wilmar respects tenure rights and recognises the long-term customary and individual rights of indigenous and local communities. The engagement of international stakeholders and local communities is critical to ensuring that Free, Prior Informed Consent (FPIC) processes are correctly implemented and continuously improved. The development of the local community, particularly smallholders, is important to ensure that there are shared benefits and value in the areas where we operate while ensuring sustainability. As a member of Roundtable on Sustainable Palm Oil (RSPO) and its Human Rights Defenders Task Force that developed the RSPO guidance on Protection of Human Rights Defenders, Wilmar is committed to the protection of human rights defenders.

## **Protecting the Right to Raise Grievance and Remedy**

We recognise the vital role of stakeholder feedback in promoting transparency and evaluating our ongoing commitments. Wilmar is committed to preventing the use of violence and ensuring that those impacted by our operations have access to remedy. We provide clear avenues for whistleblowing, assuring protection from reprisals for those who raise concerns in good faith. Our grievance procedure prioritises open and inclusive dialogue, allowing any external party, including individuals and organisations, to voice concerns regarding our NDPE Policy implementation. We are dedicated to addressing grievances effectively and ensuring all parties have a fair opportunity to be heard.

Wilmar's grievance mechanism is detailed in our [Grievance Procedure](#), which aligns with the UNGPs' effectiveness criteria. The procedure applies to Wilmar's operations, subsidiaries and third-party suppliers at the group level, covering grievances related to the implementation of Wilmar's NDPE Policy. It includes provisions for logging, verifying, addressing and publicly reporting grievances in a transparent and timely manner. Through regular reviews and stakeholder consultations, we continuously enhance our grievance mechanism to ensure its effectiveness in addressing human rights concerns.

## Supplier Compliance

Our flagship policy, the NDPE Policy, extends to our suppliers. We expect full adherence to the core principles of the NDPE Policy, including those specifically relating to Human Rights.

To ensure our supplier's continuous compliance, we have put in place several monitoring mechanisms designed to identify non-compliance or areas for improvement. This will enable Wilmar to provide necessary support and expertise to assist suppliers in achieving compliance. These are:

- Annual supplier self-reporting via the Supplier Reporting Tool (SRT) online platform
- Supplier site assessments
- Corrective action and remediation process
- Supplier support and trainings
- Supplier second-party audits (e.g. carried out by Wilmar's customers)

When issues or instances of non-compliance are identified within our suppliers' operations, the supplier is required to implement appropriate action to address the issues raised and provide remediation where necessary. Failure to do so may result in suspension. Further commitments and approach are detailed in Wilmar's [Supplier Guidelines](#) and Wilmar's [No Exploitation Protocol](#).

## Ensuring Effectiveness

To maintain the effectiveness and drive continuous improvement of our strategies, approaches and actions, Wilmar commits to the following:

- Reporting human rights-specific Key Performance Indicators (KPIs) in our annual Sustainability Report.
- Regularly review our Human Rights Policy, NDPE Policy and other relevant policies to ensure alignment with international standards and evolving best practices. This includes incorporating feedback from engagement with civil society organisations, affected stakeholders and other relevant experts.
- Conduct regular internal audits and evaluations of human rights and labour practices, both within our operations and those of our suppliers. These audits are critical for ensuring compliance with our policies, identifying areas for improvement and strengthening our practices and controls.
- Participation in multi-stakeholder collaborations to promote and pursue key human rights principles.
- Engage in pre-competitive collaboration with peers to continuously improve industry best practices.
- Communicate how human rights impacts are identified, managed and addressed through various channels, including our website, Sustainability Briefs, NDPE Implementation Reports, and public grievance listing. These platforms provide regular updates on progress, specific cases and the measures taken to address identified impacts.

### **3. Governance and Accountability**

Wilmar's governance and accountability framework ensures effective oversight and management of sustainability matters, including human rights and human rights due diligence, through day-to-day management. The Board of Directors oversees Wilmar's approach to sustainability, considering and approving material topics and impacts. The Board Sustainability Committee supports the Board in ensuring the effective integration and implementation of our sustainability strategy, impacts, risks, performance, targets, policies and practices. The Sustainability Management Team (SMT) manages daily sustainability-related operations, supported by Independent Sustainability Advisors, who offer external advice and on-the-ground support to execute ESG policies. Please visit our [Sustainability Dashboard](#) for more details on our Sustainability Governance.

This framework is subject to regular reviews and updates to ensure its continued relevance and effectiveness. Updates shall be made when gaps, discrepancies or changes in legal requirements, industry standards and organisational priorities are identified. Any revision to our HRDD Framework will be publicly communicated to ensure transparency and compliance.

## Annex on Working Conditions

Wilmar is committed to best practices in terms of fair working conditions, consistent with the principles set out in [Free and Fair Labor in Palm Oil Production: Principles and Implementation Guidance](#), developed by a multi-stakeholder forum of experts. Specifically, Wilmar commits to the following standards for its own operations and expects similar compliance from its suppliers and contractors:

- i. **Employment Contracts:** Wilmar and its suppliers/contractors shall ensure that workers are given in writing and in a language that they understand, the details of their working conditions, including but not limited to, the nature of the work to be undertaken, rate of pay and pay arrangements, working hours, vacation and other leave entitlements, as well as all other benefits of employment.
- ii. **Collective Bargaining and Freedom of Association:** Wilmar and its suppliers/contractors shall respect the rights of personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, parallel means of independent and free association and bargaining should be made available to all such personnel.
- iii. **Wages:** Wilmar and its suppliers/contractors shall ensure all workers are paid a wage equal to or exceeding the legal minimum wage and that wages are paid on time. Illegal deduction and financial penalties are not permitted.
- iv. **Working Hours:** Wilmar and its suppliers/contractors shall ensure that workers are not working more than sixty (60) hours per week as part of their standard or contracted working hours; that any overtime hours are worked on a voluntary basis and compensated at a rate consistent with national law; and that workers are not required to work on public holidays or are compensated in accordance with the local laws or regulations if they choose to work that day, and have at least one day off per seven days and at least one day off after six consecutive workdays. Where local laws or regulations provide greater protection or stricter limits on working hours, rest periods, or holiday entitlements, such requirements shall prevail.
- v. **Recordkeeping:** Wilmar and its suppliers/contractors shall maintain a transparent and reliable record of working hours and wages for all workers.
- vi. **Respect for Diversity:** Wilmar and its suppliers/contractors shall ensure that workers are protected from any discrimination that would constitute a violation of their human rights; shall establish working practices that safeguard against any unlawful or unethical discrimination; and shall endeavour to ensure that migrant workers are treated no less favourably than other workers performing similar task.
- vii. **Harassment and Abuse:** Wilmar and its suppliers/contractors shall ensure the implementation of policies to prevent and remediate harassment and abuse, including sexual harassment and abuse, including undue disciplinary measures.
- viii. **Access to Remedy:** Wilmar and its suppliers/contractors shall ensure there is no fear of recrimination or dismissal in the access to judicial remedy and credible grievance mechanisms. Wilmar and its suppliers/contractors have a role to play in protecting the right to defend human rights.
- ix. **Data Protection:** Wilmar and its suppliers/contractors shall ensure confidentiality in all their dealings and ensure that permission has been given and documented before disclosing, displaying, submitting or seeking confidential or personal information or data obtained in connection with the recruitment or employment of workers.
- x. **Accommodations:** When housing accommodations are provided, Wilmar and its suppliers/contractors with whom they are engaged in long-term contracts shall ensure that such accommodations:
  - a. are safe, adequate and compliant with applicable national regulations;
  - b. provide workers with safety measures to ensure the security of their belongings; and
  - c. do not restrict workers' right to freedom of movement.