

## Human Rights Framework

Wilmar International ("Wilmar") respects and supports the Universal Declaration of Human Rights and the rights of all workers including contract, temporary and migrant workers. This document is based on the United Nations (UN) Guiding Principles on Business and Human Rights framework, which encompasses the three pillars of "Protect, Respect, and Remedy", plus promotion of human rights. We use this framework to guide the development and implementation of our policies, action plans, and mechanisms.

This framework focuses on the following key areas of (1) Labour Rights, and (2) Indigenous and Local Community Rights, and is supported by the following:

- Our policies and statements on key human rights aspects, notably:
  - No Deforestation, No Peat, and No Exploitation Policy (NDPE)
  - Human Rights Policy
  - Equal Opportunity Policy
  - Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy
  - Child Protection Policy
  - Women's Charter
  - Grievance Procedure
  - Whistleblowing Policy
  - UK Modern Slavery Act Transparency Statement
- Due diligence mechanisms to identify, prevent, mitigate and account for our human rights impacts
- Systems to receive, process, monitor and remediate any adverse human rights impacts.

Wilmar is also actively participating in joint partnerships and various multi-stakeholder platforms to promote, respect and provide support for human rights. This includes involvement in certification standards such as the Roundtable for Sustainable Palm Oil (RSPO) where we are in active leadership positions within the Human Rights Working Group and Labour Task Force, Malaysian Palm Oil Certification Council (MPOCC), and private sector led initiatives such as Decent Rural Living Initiative (DRLI), and Business for Social Responsibility (BSR) labour workshops series for the oil palm industry. Through our own sustainability commitments, we are also committed to promote and ensure protection of human rights within our supply chain.

Finally, we consult and engage with human rights experts and civil society organizations to help provide oversight and to help ensure feedback is received for the continuous improvement of our human rights initiatives.



## Key focus areas for Human Rights



## Respecting Labour Rights

We commit to ensuring that the rights of all people working in any of our operations are respected according to local, national and ratified international laws. We also commit to ensuring international best practices where legal frameworks are not yet in place.

Policy Statement	Our Approach
<p><b>No Exploitation – Forced Labour</b></p> <p>Wilmar and its suppliers and sub-contractors shall not knowingly use or promote the use of forced or bonded labour or human trafficking and shall take appropriate measures to prevent the use of such labour in connection with their activities.</p> <p>The company shall employ remedial actions in the case that such labour or trafficking is uncovered to ensure that victims are referred to the existing services for support and assistance.</p>	<ul style="list-style-type: none"> <li>- Standardized employment contracts</li> <li>- Passports return</li> <li>- Voluntary overtime</li> <li>- Ethical recruitment</li> <li>- Decent living conditions</li> <li>- Freedom of movement</li> <li>- No unlawful deductions</li> <li>- Access to remedy with no reprisals</li> <li>- Post arrival orientation</li> <li>- UK Modern Slavery Act</li> </ul> <p>Transparency Statement Wilmar International</p>



Policy Statement	Our Approach
<p><b>No Exploitation – Freedom of Association</b></p> <p>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.</p>	<ul style="list-style-type: none"> <li>- Alternative representation for operating units where no unions operate</li> <li>- No interference policy and ensuring independence of labour unions</li> <li>- Collective Bargaining Agreements, e.g. SERBUNDO in North Sumatera, CNV Internationaal in Murini Sam Sam etc.</li> <li>- Regular periodic meetings between management and union leaders to discuss any matters pertaining to union members and workers in general</li> </ul>
<p><b>Child Protection</b></p> <p>Wilmar does not tolerate child labour, any forms of child exploitation, and child abuse.</p>	<ul style="list-style-type: none"> <li>- Access to education</li> <li>- Access to childcare facilities</li> <li>- Strict age-verification and other relevant procedures to ensure no underaged workers</li> <li>- Providing guidance to suppliers</li> <li>- Remediation to child labour</li> <li>- Child-friendly and safe environment</li> <li>- Contractors' audit</li> </ul>
<p><b>Occupational Health and Safety</b></p> <p>Wilmar takes moral and legal responsibility for people's health and safety and commits to providing a safe and healthy environment for its employees, contractors, clients and visitors in all aspects of its operations.</p>	<ul style="list-style-type: none"> <li>- Certifications &amp; inspections (e.g. RSPO, Malaysian Sustainable Palm Oil, Indonesian Sustainable Palm Oil)</li> <li>- Assessments (e.g. Hazard Identification, Risk Assessment &amp; Risk Control; Chemical Health Risk Assessment)</li> <li>- Enablon reporting</li> <li>- Workmen compensation insurance</li> <li>- Medical and healthcare</li> <li>- Free Personal Protective Equipment and Health &amp; Safety training</li> <li>- Prevention of accidents</li> <li>- Safe environmental conditions</li> </ul>
<p><b>Non-Discrimination / Equal Opportunity</b></p> <p>We are committed to providing equal opportunity to all employees, we will not discriminate in hiring, promotion or retirement. We ensure a diverse and representative workforce profile through the promotion of employment equality.</p>	<ul style="list-style-type: none"> <li>- Human Resource hiring procedure process based on merit</li> <li>- Training for internal educational improvement for staff</li> <li>- Post arrival orientation</li> <li>- Non-discrimination training</li> <li>- Maternity protection</li> <li>- In Indonesia, increasing number of permanent workers.</li> </ul>

Policy Statement	Our Approach
	<ul style="list-style-type: none"> <li>- Providing female workers more opportunities for permanent work.</li> <li>- In Africa, comprehensive system of care for HIV positive personnel</li> </ul>
<b>Wilmar's Women Charter</b> Policies on Sexual Harassment, Violence and Abuse, and respect for Reproductive Rights <ul style="list-style-type: none"> <li>- To provide conducive working environment that is characterized by equality and mutual respect.</li> <li>- To take all reasonable measures to prevent such incidents and deal promptly and fairly with any reports of sexual harassment in a confidential and discreet manner.</li> </ul>	<ul style="list-style-type: none"> <li>- Trainings for workers and management</li> <li>- Specific and confidential channel for sexual harassment complaints/grievances</li> <li>- Women's Committee</li> <li>- Women's healthcare</li> <li>- Family planning</li> <li>- Childcare services</li> </ul>

### Respect for Community and Indigenous Rights

Wilmar respects tenure rights and recognizes 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 and 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 area in which we operate, whilst ensuring sustainability. As members of the RSPO, Wilmar is also committed to the protection of human rights defenders. Wilmar was a member of the RSPO Human Rights Defenders Task Force that developed the RSPO's guidance on Protection of Human Rights Defenders.

We recognize that we need to work on supporting compliance for smallholders outside of meeting certification requirements. We are currently formulating new approaches in consultation with stakeholders.

Policy Statement	Our Approach
<b>No Exploitation – Community Development, Land Rights and Community Rights</b> <ul style="list-style-type: none"> <li>- Respect <b>Land Tenure Rights</b></li> <li>- Respect the <b>Rights of Indigenous and Local Communities</b> to give or withhold their <b>Free, Prior and Informed Consent (FPIC)</b> to Operations on Lands to Which They Hold Legal, Communal or Customary Rights</li> </ul>	<ul style="list-style-type: none"> <li>- FPIC prior to new development</li> <li>- Land acquisition and land legalizing through due legal process</li> <li>- Due diligence for new acquisition</li> <li>- In Indonesia, plan to review of existing internal operations regarding social conflict between Wilmar and communities</li> <li>- Systematic approach for land claim resolution</li> </ul>



Policy Statement	Our Approach
	<ul style="list-style-type: none"> <li>- Community development opportunities explored with the local communities</li> <li>- Supporting smallholder farmer communities that supply to Wilmar mills, including certification support</li> </ul>
<b>No Exploitation – Supporting Smallholders</b> <ul style="list-style-type: none"> <li>- Facilitate the inclusion of smallholders into the supply chain</li> <li>- Provide technical assistance and support to smallholders</li> </ul>	<ul style="list-style-type: none"> <li>- Support smallholders in achieving nationally mandated sustainable certification including efforts to improve livelihoods, and where viable for the smallholder, RSPO certification</li> <li>- Where smallholders are direct suppliers to Wilmar, support for NDPE compliance is provided</li> </ul>

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

We recognize that feedback and input from stakeholders is valuable because it helps to enhance transparency and provides a means to gauge progress on implementation of our commitments and policies. We encourage feedback on our own implementation as well as that of our suppliers.

Wilmar maintains a clear and strong commitment to non-violence and will do whatever possible, in all contexts, to prevent the use of force or the threat or real application of violence, and to ensure that parties adversely impacted by our operations and practices have access to remedy.

Policy Statement	Our Approach
<b>Whistleblowing, Human Rights Defender Policy</b> <ul style="list-style-type: none"> <li>- Provides proper avenues to raise concerns about actual or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken</li> <li>- Aims to assure all affected parties that such acts will be protected from reprisals or victimization for whistleblowing in good faith</li> </ul>	<ul style="list-style-type: none"> <li>- Receive and act on any reports, with no reprisal</li> <li>- Providing a direct and more immediate means for workers to raise grievances with the option of anonymity</li> <li>- Providing access to remedy with no reprisal</li> </ul>
<b>Grievance Procedure</b> <ul style="list-style-type: none"> <li>- Wilmar commits to handle any grievance from any external parties, including individuals, government organizations and non-governmental organizations (NGOs) concerning the</li> </ul>	<ul style="list-style-type: none"> <li>- Receive and act on any reports</li> <li>- Providing a direct means of raising grievance for any stakeholder, including anonymously</li> <li>- Providing access to remedy with no reprisal for complainants where grievances have been verified as correct</li> </ul>

Policy Statement	Our Approach
implementation of the NDPE Policy. <ul style="list-style-type: none"><li>- The Grievance Procedure favors open and inclusive dialogues with stakeholders over complex administrative processes.</li></ul>	<ul style="list-style-type: none"><li>- Identifying corrective actions and remediation processes for verified issues and grievances within the relevant operations</li></ul>

### Supplier Compliance

Our flagship policy, the NDPE policy, extends to our suppliers. This means that we expect adherence to the core principles of the NDPE policy, including those that specifically cover Human Rights.

- To ensure our supplier's continued compliance, we have put in place several means of checks and reporting so that we can identify when there are non-compliances or areas where improvement is needed. This will enable Wilmar to provide support and know-how to our suppliers to help them with compliance. These are:
  - o Annual supplier self-reporting via the OnConnect Supplier Reporting Tool (SRT)
  - o Supplier 3<sup>rd</sup> party verification assessments
  - o Corrective action and remediation process
  - o Supplier support
  - o Trainings
  - o Supplier 2<sup>nd</sup> party audits (e.g. carried out by Wilmar customers)

Wilmar has a zero-tolerance policy on the following: child labour, bonded and forced labour, restriction of freedom of movement. Where these are found within our suppliers' operations, the supplier will be required to acknowledge the issues, and put in place an immediate corrective action and remediation plan. Failure to do so may result in suspension.

### Ensuring Effectiveness

To ensure the effectiveness and continuous improvement of the strategies, approaches, and actions we have put in place, we will continue to do the following:

- Reporting of Human Rights specific Key Performance Indicators (KPIs) in annual Sustainability Report
- Periodic review of NDPE policy and relevant policies, incorporating feedback and consultation with Human Rights civil societies, NGOs, government, and UN agencies
- Participation in multi-stakeholder collaborations to promote and pursue key human rights principles
- Involvement in pre-competitive collaboration with peers to continuously improve on industry best practice