

Policy on Human Rights Defenders (HRDs)

10 December 2021

Purpose:

Wilmar International Limited (Wilmar), understands “Human Rights Defenders” (HRDs) as people who, individually or with others, act peacefully to promote or protect human rights¹. HRDs may include individuals or organisations working on civil, political, economic, social and cultural rights. They include land, environmental, and indigenous community defenders; women's rights and LGBTI activists; unionists and anti-corruption advocates. HRDs may include local and indigenous communities, non-governmental organisations, intergovernmental organisations, government, legal professionals, journalists, academics, researchers and the private sector. For Wilmar, this also includes whistleblowers, complainants, community spokespersons, and Environmental Human Rights Defenders². Some HRDs may face additional and heightened risks based on their identity, gender, religion and ethnicity which would vary depending on the contexts in which they operate (e.g., women indigenous peoples, 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 its human rights commitments. We acknowledge the crucial contribution of HRDs to a healthy civic space in the countries we operate and therefore support the protection of HRDs acting in good faith to exercise and defend fundamental human rights. We also recognise the important role that HRDs can play in our due diligence and 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.

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.

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 Rights³ (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

¹ We recognise that not all individuals or organisations that fall into this category will self-identify as Human Rights Defenders (HRDs).

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

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

Scope:

The scope of this policy covers Wilmar's global operations, including our subsidiaries, joint-ventures, and third-party suppliers. This means that we expect all our third-party suppliers and joint venture partners 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 or participates in an investigation or whistle blows on activities in our business operations and supply chain, in good faith. This could include 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 social⁴.

Commitments described in this policy, which are in line with our No Deforestation, No Peat, No Exploitation (NDPE⁵) Policy and Human Rights policies are applicable across our supply chain. Our human rights due diligence (HRDD) and grievance processes ensure that we are able to respond and take action on parties within our supply chain, found to have abused the rights of HRDs. We further strive to use our voice, alone or with others, when HRDs are at risk.

Acknowledging that indigenous peoples are among the most vulnerable groups, Wilmar is committed to respecting the demonstrable⁶ legal, communal or customary rights of indigenous and local communities as outlined in our NDPE policy.

Wilmar is committed to strengthening gender equality in its own operations and across its supply chain. As such, we recognise that HRDs who are women or sexual and 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 Protection of Human Rights Defenders as a member of the RSPO Human Rights Defenders Task Force.

Implementation:

We will take steps to incorporate the protection of HRDs' rights into our HRDD mechanisms, management and monitoring processes to identify, prevent, mitigate and remediate adverse human rights impacts in our operations and supply chain. 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.

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

⁵ https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-ndpe-policy---2019.pdf?sfvrsn=7870af13_2

⁶ 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.

Wilmar also operates a [Whistleblowing Policy](#)⁷ and a [Grievance Procedure](#)⁸, whereby any individual or party can raise a concern and lodge a formal complaint against Wilmar, its subsidiaries, joint venture partners or its suppliers under condition of anonymity and without fear of reprisal. In 2020, we published a No Exploitation Protocol⁹ 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 to this policy will be investigated under the grievance procedure.

To ensure effective implementation of this policy, contents of this policy will be shared to all those in scope, and for Wilmar employees, relevant training will be provided.



Kuok Khoon Hong
Chairman and Chief Executive Officer
Wilmar International Limited
10 December 2021

⁷ Allows for internal and external personnel to raise concerns about possible corporate improprieties in confidence and establishes a framework for independent investigations.

⁸ The procedure manages grievances raised by any stakeholder with respect to the implementation of Wilmar's NDPE policy.

⁹ https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-no-exploitation-protocol.pdf?sfvrsn=e2b8c921_2