



# NDPE IRF ACTION PLAN (2024-2025)

The No Deforestation, No Peat, No Exploitation Implementation Reporting Framework (NDPE IRF) is a tool that provides palm oil companies with an industry-wide approach to measure progress on NDPE commitments across the entire production base connected to their supply chain. As companies implement activities to deliver on these commitments, the NDPE IRF provides a way to systematically capture all these different activities, assess how they contribute to improving sustainability performance and highlight remaining gaps.

Wilmar has been an active member of the **NDPE IRF** initiative since 2019. It has been a highly effective tool in helping us assess performance across our whole production base. It is also a platform that supports discussions to align considerations on key issues and identify areas for collaborative action.

## OBJECTIVE

Wilmar recognises the importance of advocating and committing to climate action beyond our own operations. Following COP27, we worked closely with our peers to develop the **Palm Oil Sectoral Roadmap** which serves as a blueprint for the industry to collectively achieve emission reduction goals and enhance supply chain actions consistent with a 1.5-degree Celsius pathway. In line with this commitment, Wilmar is working to shift all suppliers' palm oil volumes into the "Delivering" category of the NDPE IRF by 2025.

Further, this NDPE IRF Action Plan should be read in conjunction with Wilmar's **2024-2025 Timebound Action Plan**.

## SCOPE

Covers Wilmar's global operations including our joint ventures (JVs).

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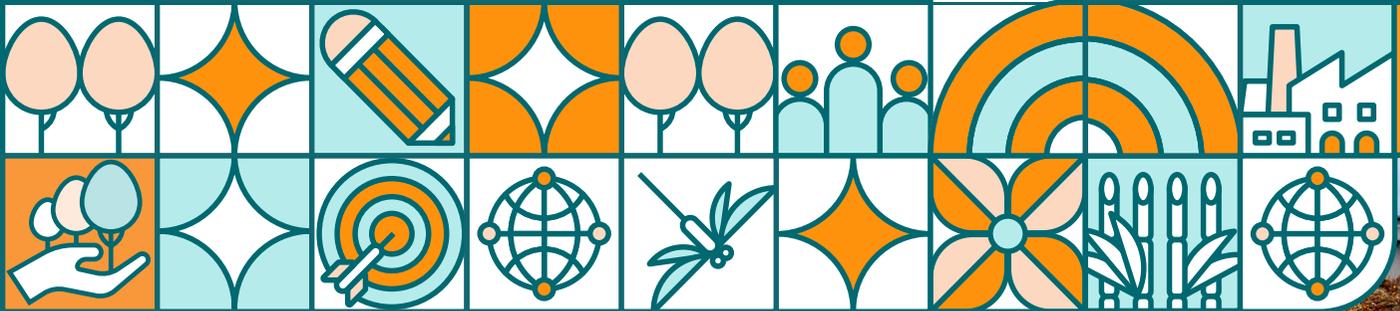


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**PALM OIL  
SECTORAL  
ROADMAP**

AND HERE TO VIEW

**2024-2025  
TIMEBOUND  
ACTION PLAN**



## ROLES AND RESPONSIBILITY

### BOARD OF DIRECTORS

Wilmar's approach to sustainability is overseen by the Chairman and Chief Executive Officer and the Board of Directors, with the support of the Board Sustainability Committee (BSC). The BSC sets strategic goals for sustainability and considers sustainability issues in the formulation of business strategies and corporate policies of the Group. This includes approving material topics and impacts identified through the materiality assessment and stakeholder engagement process. The Board is kept abreast of the BSC's decisions and proceedings.

### BOARD SUSTAINABILITY COMMITTEE

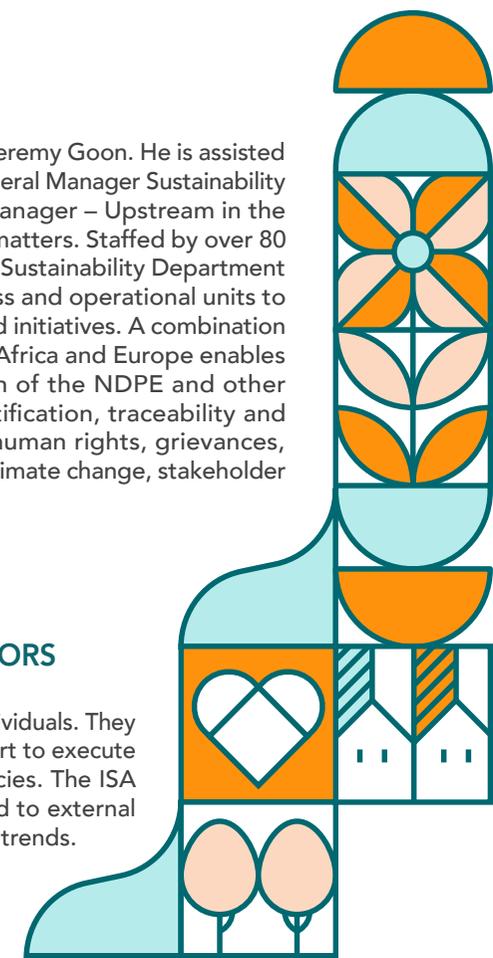
The BSC plays a crucial role in ensuring the effective integration and implementation of sustainability initiatives across the Group. Its primary responsibilities include overseeing Wilmar's sustainability strategy and impact, identifying environmental, social, and governance (ESG)-related risks and opportunities, evaluating ESG targets and performance as well as monitoring the implementation of ESG-related policies and practices. The BSC meets quarterly to review sustainability matters and receives periodic reports and advisories from the Sustainability Management Team (SMT) with support from the Independent Sustainability Advisors (ISA). The BSC provides input to the Board on ESG issues as well as Wilmar's sustainability performance and governance, including identifying and addressing relevant sustainability risks and concerns.

### SUSTAINABILITY MANAGEMENT TEAM AND SUSTAINABILITY DEPARTMENT

The SMT is led by the Chief Sustainability Officer, Jeremy Goon. He is assisted by the General Manager – Group Sustainability, General Manager Sustainability - External Engagement and Assistant General Manager – Upstream in the day-to-day management of sustainability-related matters. Staffed by over 80 employees across our global offices and sites, the Sustainability Department supports the SMT in collaborating with all business and operational units to implement the Group's sustainability strategies and initiatives. A combination of local and technical expertise throughout Asia, Africa and Europe enables the department to oversee the implementation of the NDPE and other sustainability-related policies, sustainability certification, traceability and supply chain monitoring, supplier compliance, human rights, grievances, conservation efforts, research and development, climate change, stakeholder engagement and reporting.

### INDEPENDENT SUSTAINABILITY ADVISORS

The ISA comprises external experts and eminent individuals. They work with the SMT to provide on-the-ground support to execute and evaluate the implementation of our ESG policies. The ISA also provides advice and recommendations related to external stakeholder expectations and global sustainability trends.



## TARGETS AND MILESTONES

DESCRIPTION	TARGET	ACTIVITY	MILESTONES	STATUS	NOTES
<p><b>WILMAR'S OWN MILLS</b></p> <p>Wilmar operates 45 palm oil mills located across Malaysia, Indonesia, Ghana and Nigeria. Nine mills in Indonesia are independent operations that purchase fresh fruit bunches exclusively from third-party suppliers. For the remaining mills, only one is supplied by our own plantations while the other 35 mills source from both our own and third-party suppliers.</p>	<p>100% "DELIVERING" BY 2023</p>	<p>Continued engagement with mills in 2023 to ensure good progress was maintained.</p>	<p>As of December 2023, all 45 Wilmar-owned palm oil mills are under "Delivering" category.</p>	<p> Achieved</p>	<p>In 2022, nine independent mills in Indonesia were under the "Commitment and Starting Action" category. Direct engagement with the mills throughout 2022 and 2023 resulted in a positive improvement.</p>
<p><b>THIRD-PARTY MILLS</b></p> <p>Over 875 mills directly supply Wilmar refineries in Malaysia/Indonesia alone, with each refinery typically having between 50 and 100 mills in its supply network.</p>	<ul style="list-style-type: none"> <li>• 100% OF VOLUMES IN "COMMITMENT AND STARTING ACTION" OR HIGHER CATEGORY WHICH INCLUDES 60% OF VOLUMES IN "PROGRESSING" OR HIGHER CATEGORY BY 2023</li> <li>• 80% OF VOLUMES IN "DELIVERING" BY 2024</li> <li>• 100% "DELIVERING" BY 2025</li> </ul>	<p>Improved cross-functional and inter-regional data collection and processing effort, supported by systems such as our Supplier Reporting Tool (SRT), Supplier Group Compliance Programme (SGCP) and Grievance Procedure, among others.</p>	<p>In 2023, of the total volumes sourced by our Origin Refineries in Indonesia and Malaysia, 91.4% originated from mills delivering on No Deforestation commitments. This correlated to 91.4% of volumes from supplying mills in the "Delivering" NDPE IRF category. Of the remaining volumes sourced, 8.1% originated from mills that have committed or have taken action to ensure their volumes comply with our No Deforestation commitments. Of the total volumes sourced by our Destination Refineries, 81.5% were from supplying mills that are delivering on NDPE commitments.</p> <p><b>OVERALL PROGRESS</b></p> <p>As of December 2023, 88.4% across our global supply chain were from suppliers that are delivering on No Deforestation requirements.</p> <p>In comparison, as of December 2022, 45.5% across our global supply chain were from suppliers that are delivering on No Deforestation requirements.</p> <p>This represents an increase of 43.6% in the highest NDPE IRF category for No Deforestation.</p>	<p> In progress</p>	<p>In 2023, less than 0.4% of volumes sourced by our origin refineries in Malaysia/Indonesia originated from third-party mills that are in "Awareness" or "Known" categories.</p> <p>Wilmar has taken a number of steps to enhance the identification and closing of gaps on implementing NDPE, particularly with regard to third-party supply to mills in 2023. These include improving our approach to collecting data on TtP, updating our satellite monitoring methodology and promoting the adoption of NDPE IRF through meetings and trainings.</p>

## TARGETS AND MILESTONES *(continued)*

DESCRIPTION	TARGET	ACTIVITY	MILESTONES	STATUS	NOTES
<p><b>THIRD-PARTY REFINERIES/ TRADERS/BULKERS</b></p> <p>Wilmar’s refineries procure palm products globally from third-party refineries/traders and bulkers. Where this is the case, we request for information (TtM/TtP/NDPE IRF) for volumes received. Wilmar’s sustainability team then continuously monitors the lists obtained from suppliers to ensure that there is no breach of our NDPE policy.</p>	<p>100% “DELIVERING” BY 2025</p>	<p>From 2024 to 2025, we aim to ramp up efforts by engaging with <b>ALL our direct third-party refinery/trader/bulker suppliers</b> to gather information on their sourcing. This includes encouraging voluntary disclosure of IRF profiles through self-assessment tools where we buy directly.</p>	<p>As of December 2023, we received from around 381 third-party refineries/traders/bulkers globally. Of this, NDPE IRF profiles of 181 suppliers were available either through requests made on a B2B basis or have been published on company sustainability dashboards. Further, approximately 29.4% of the profiles have been verified per the NDPE IRF verification protocol.</p>	<p> In progress</p>	<p>While good progress was noted in 2023 due to improved data collection processes, shifting volumes away from the “Unknown” category remains a challenge as many suppliers are still reluctant to provide detailed information on traceability. NDPE IRF reporting also remains low for small and medium enterprises (SMEs) as compared to large companies and not all companies publish profiles for their entire scope of operation.</p>

## REPORTING

Wilmar’s NDPE IRF profiles have been independently verified by Control Union Certifications for all our global operations. As such, data collected across our 70 global facilities through our SRT, Traceability and SGCP, among others, have been externally verified.

While we appreciate the efforts of those who have published their NDPE IRF profiles, more engagement and support are needed to encourage the participation of SMEs and other small suppliers in order to progress more significantly on NDPE commitments.

