



NDPE IRF ACTION PLAN (2025-2026)



The No Deforestation, No Peat, No Exploitation Implementation Reporting Framework (NDPE IRF) is a comprehensive tool used by palm oil companies to assess and track their progress on NDPE commitments across their supply chains. It systematically captures activities related to fulfilling these commitments, evaluates sustainability impacts and identifies areas where further progress is needed.

Since 2019, Wilmar has been actively involved in the [NDPE IRF](#) initiative, contributing to industry discussions and collaborative actions to address key sustainability issues. In addition, Wilmar uses this framework to track our progress towards achieving our deforestation- and conversion-free commitments.

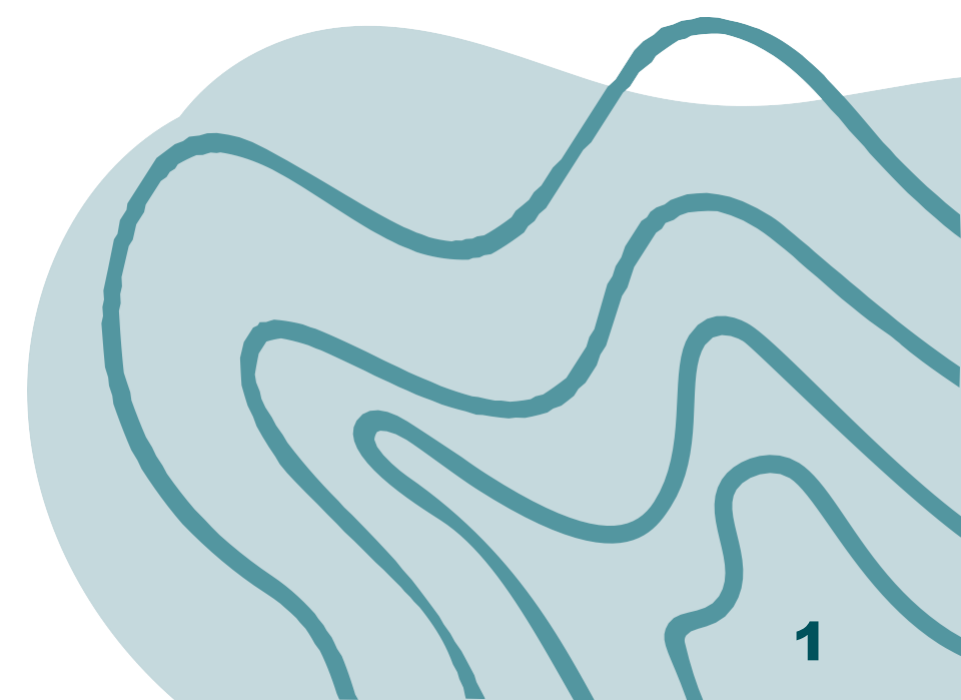
OBJECTIVE

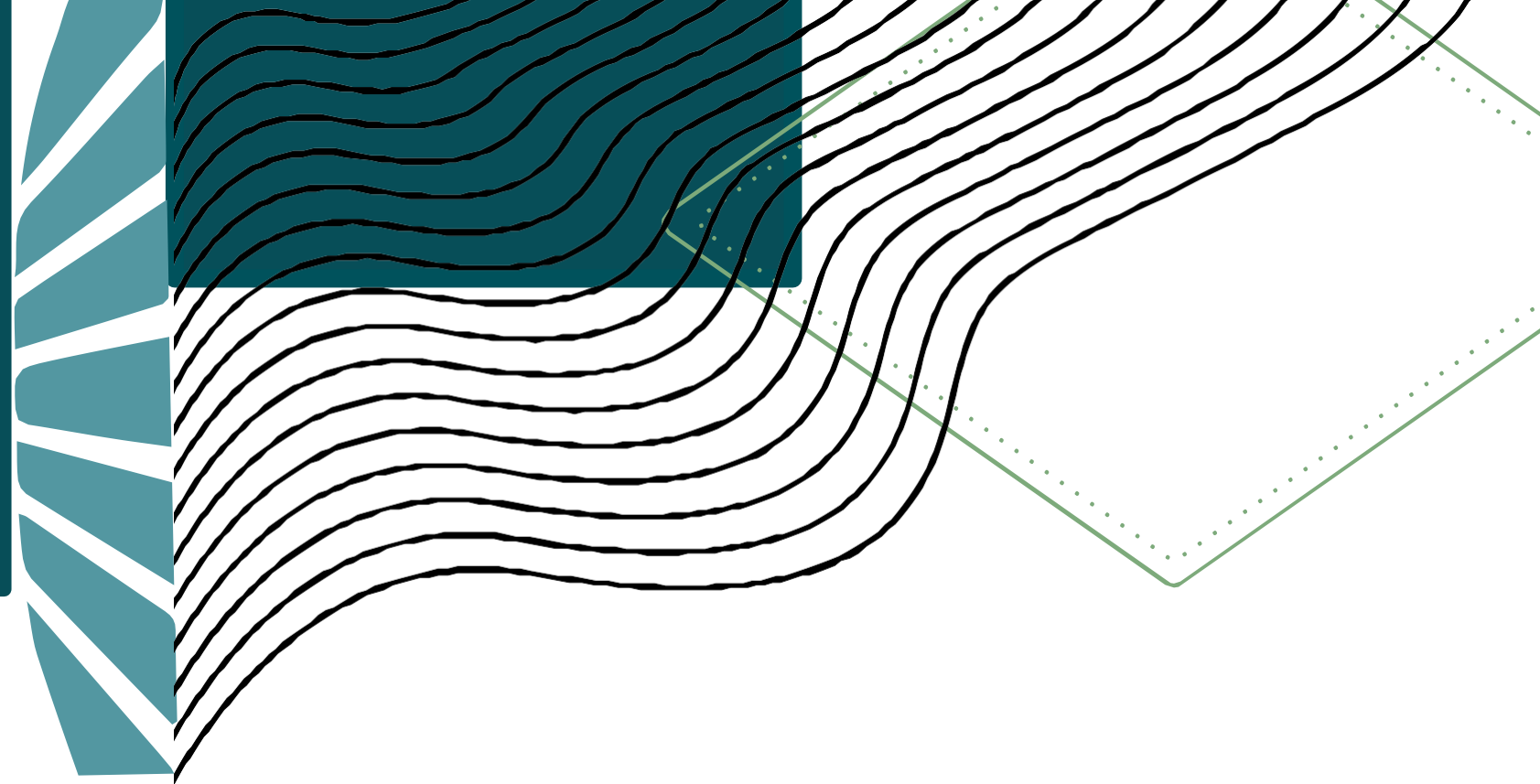
Wilmar remains committed to achieving 100% “**Delivering**” status for its palm oil volumes. As part of this effort, we are currently aligning and revising our reporting data to meet the requirements of the updated NDPE IRF framework (**version 6.0**).

Further, this NDPE IRF Action Plan should be read in conjunction with [Wilmar's 2025-2026 timebound action plan](#).

SCOPE

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





ROLES AND RESPONSIBILITIES

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 sustainability goals and incorporates sustainability considerations into the Group's business strategies and corporate policies. The Board is informed of the BSC's decisions and activities through regular engagements.

BOARD SUSTAINABILITY COMMITTEE

The BSC plays a pivotal role in overseeing Wilmar's sustainability strategy, ensuring the effective integration of environmental, social and governance (ESG) initiatives across the Group. Its responsibilities include identifying and evaluating ESG risks and opportunities, monitoring policy implementation and assessing performance against ESG targets. Climate and nature-related impacts, risks and opportunities are considered as part of this oversight, in alignment with relevant international standards and guidelines as well as our governance framework.

The BSC holds quarterly meetings to review sustainability matters and reports outcomes from these discussions to the Board. It receives periodic updates and advisories from the Sustainability Management Team (SMT) supported by Independent Sustainability Advisors (ISA). The BSC provides the Board with regular input on ESG issues, sustainability performance and governance.


SUSTAINABILITY MANAGEMENT TEAM AND SUSTAINABILITY DEPARTMENT

Wilmar's Chief Sustainability Officer, Jeremy Goon, leads the SMT. He is supported by the General Manager – Group Sustainability and Assistant General Manager – Upstream in the daily management of sustainability-related matters. The Sustainability Department, staffed with over 90 employees across global offices and sites, works in close association with all business and operational units to implement the Group's sustainability strategies and initiatives. With a blend of local and technical expertise across Asia, Africa and Europe, it manages the implementation of our NDPE and other sustainability policies. The department is also responsible for sustainability certification, traceability and supply chain monitoring, supplier compliance, human rights, grievance handling, conservation efforts, research and development, climate change initiatives, stakeholder engagement and reporting.



INDEPENDENT SUSTAINABILITY ADVISORS

Wilmar also consults our ISA, comprising external experts and eminent individuals, to provide on-the-ground support to execute and evaluate our ESG policies by collaborating closely with the SMT. In addition, the ISA offers valuable advice and recommendations on aligning with external stakeholder expectations and navigating global sustainability trends.


TARGETS AND MILESTONES

| DESCRIPTION | TARGET | ACTIVITY | MILESTONES | STATUS | NOTES |
|---|----------------------------------|--|---|---|-------|
| <p>WILMAR'S OWN MILLS</p> <p>Wilmar operates 44 palm oil mills located across East Malaysia, Indonesia, Ghana and Nigeria. Seven mills in Indonesia are independent operations that purchase fresh fruit bunches exclusively from third-party suppliers. For the remaining mills, six are supplied by our own plantations while the other 31 mills source from both our own and third-party suppliers.</p> | <p>100% "DELIVERING" BY 2023</p> | <p>Continued engagement with mills throughout 2024 to ensure good progress was maintained.</p> | <p>Since 2023 and continuing into 2024, all 44 Wilmar-owned palm oil mills are under "Delivering" category.</p> | <p> ACHIEVED</p> | |

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| <p>THIRD-PARTY MILLS</p> <p>Wilmar refineries are directly supplied by over 870 mills, with 821 of them located in Malaysia and Indonesia. Each refinery typically sources from a supply network of 50 to 100 mills.</p> | <ul style="list-style-type: none"> • 80% OF VOLUMES “DELIVERING” BY 2024 • 100% “DELIVERING” BY 2025 | <p>Continued to improve cross-functional and inter-regional data collection and processing efforts, which was supported by systems such as our Supplier Reporting Tool (SRT), traceability programme, Supplier Group Compliance Programme (SGCP) and Grievance Procedure, among others.</p> | <p>As of December 2024, 99.9%* of the total volumes sourced by our Origin Refineries in Indonesia and Malaysia were from mills delivering on No Deforestation commitments. This correlates to 99.9%* of volumes from supplying mills in the “Delivering” NDPE IRF category. Of the total volumes sourced by our Destination Refineries, 87.8%* were from supplying mills that are delivering on NDPE commitments.</p> <p>OVERALL PROGRESS</p> <p>As of December 2024, 95.9%* across our global supply chain were from suppliers that are delivering on No Deforestation requirements.</p> <p>In comparison, as of December 2023, 88.4% across our global supply chain were from suppliers that are delivering on No Deforestation requirements.</p> <p>This represents an increase of 7.5% in the highest NDPE IRF category for No Deforestation.</p> | <p> ACHIEVED</p> <p> IN PROGRESS FOR 2025</p> | <p>In 2024, less than 0.1% volumes sourced by our Origin Refineries in Malaysia/Indonesia originated from third-party mills that are in the “Known” category.</p> <p>In 2024, Wilmar focused on enhancing data collection for Traceability to Plantation (TtP) and improving satellite monitoring procedures. Furthermore, training sessions and meetings were organised to promote the adoption and understanding of the NDPE IRF among suppliers, especially third-party refiners and traders. These efforts not only enhanced suppliers’ NDPE progress and reporting capabilities but also supported Wilmar in achieving our sustainability and reporting objectives.</p> |

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| <p>THIRD-PARTY REFINERIES/TRADERS/BULKERS</p> <p>Wilmar’s refineries also procure palm products from third-party refineries/traders and bulkers globally. Where this is the case, we request for information (Traceability to Mill /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>In 2025, we aim to ramp up efforts by engaging with ALL our direct third-party refinery/trader/bulker suppliers 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 2024, we received from around 572 third-party refineries/traders/bulkers globally. Of this, NDPE IRF profile of 281 suppliers were available either through requests made on a B2B basis or have been published on company sustainability dashboards.</p> <p>Further, approximately 25.5% of the profiles have been verified per the NDPE IRF verification protocol.</p> | <p> IN PROGRESS</p> | <p>Despite notable progress made through improved data collection processes, shifting volumes out of the “Unknown” category remains a challenge. Many suppliers are still reluctant to provide detailed traceability information. NDPE IRF reporting is also less prevalent among small and medium enterprises (SMEs) compared to larger companies. SMEs face significant hurdles in NDPE IRF reporting mainly due to limited resources and a reluctance to disclose detailed information.</p> |

REPORTING

Wilmar’s NDPE IRF profiles have been independently verified by Control Union Certifications for all our global operations. Data collected across our 72 global facilities through our SRT, traceability programme and SCGP, among others, have all undergone external verification.

While we commend those who have shared their NDPE IRF profiles, Wilmar recognises the need for increased engagement and targeted support to help suppliers of all sizes participate in reporting, which is essential for driving broader progress towards NDPE goals.





WILMAR INTERNATIONAL LIMITED

CO. REG. NO. 199904785Z

28 Biopolis Road
Singapore 138568
T. (65) 6216 0244

<https://www.wilmar-international.com/>

