



**Wilmar's No Deforestation, No Peat, No Exploitation Policy
Fourth Quarter Update Report: 1 October – 31 December 2015**

Introduction

The fourth quarter (Q4) of 2015 has seen good progress across all areas as Wilmar pushes towards the end-2015 implementation deadline for our No Deforestation, No Peat, No Exploitation Policy (Integrated Policy).

This report summarises Wilmar's efforts and progress in the five areas below. Key highlights include:

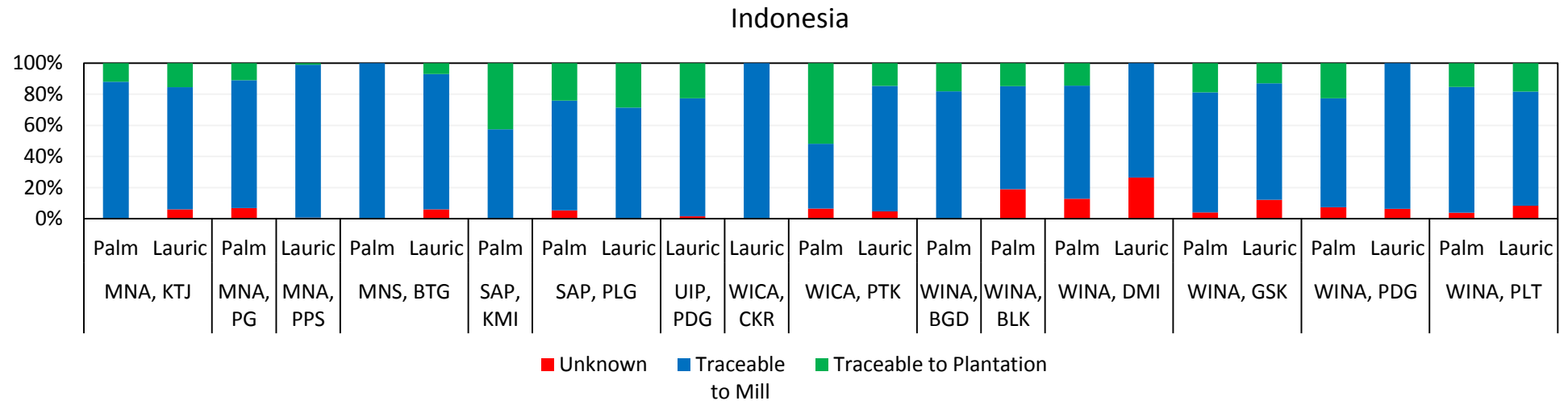
1. **Supply chain mapping and traceability** – traceability improvements across almost all our global operations.
2. **Smallholder support programmes** – projects aimed at incentivising sustainable practices and support programmes to improve productivity were launched.
3. **High Conservation Value (HCV) and High Carbon Stock (HCS) Forest conservation** – extension of successful orangutan conservation partnership and progress in research partnership to improve management of conservation areas.
4. **Stakeholder engagement** – Multi-stakeholder workshop in China to boost the import of sustainably produced commodities and bilateral meetings with prominent international NGOs.
5. **Policy compliance and grievance procedure** – progress on Aggregator Refinery Transformation approach and socialisation of grievance procedure with NGOs.

1. Supply chain mapping

Traceability analysis and summary data continue to be measured across Wilmar's global operations: Indonesia, Malaysia, India, Bangladesh, Sri Lanka, China, Nigeria, Ghana, South Africa, Vietnam, United States of America, Ukraine and Europe. Data for Wilmar Oleochemicals B.V., Rozenburg has been added to the analysis this quarter.

Traceability data has been updated to include the most recent four quarters, replacing Q3 2014 supplies with Q3 2015 supplies. The data below for all facilities relates to data on supplies and shipments for the year from October 2014 – September 2015. Change in traceability % across our global operations is almost negligible in comparison to the previous quarter reporting, with an exception of an eight percent increase in palm traceability for China-Specialty Fats.

Indonesia



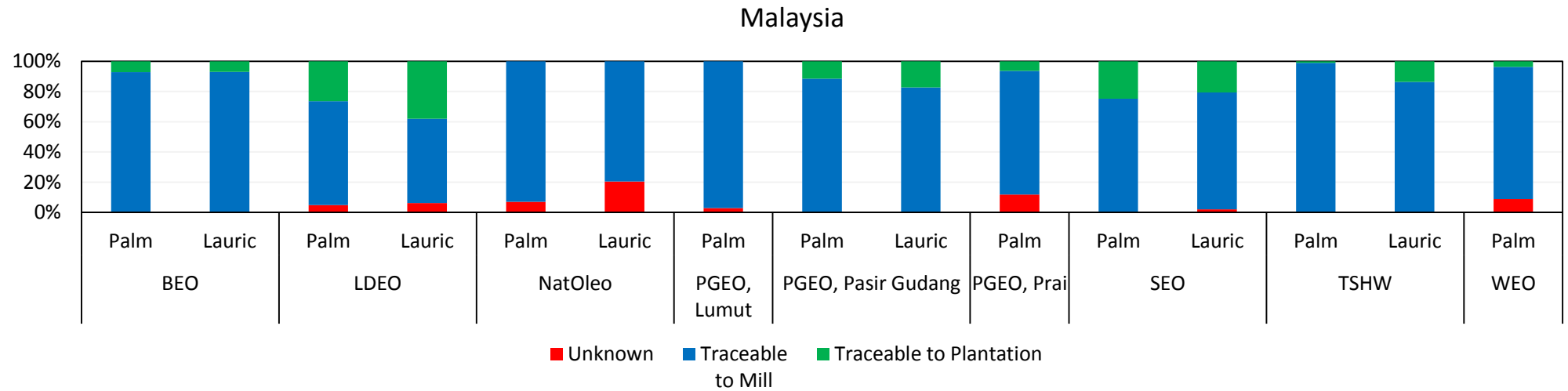
LEGEND

Refinery	Code
PT Multimas Nabati Asahan, Kuala Tanjung	MNA, KTJ
PT Multimas Nabati Asahan, Pulo Gadung	MNA, PG
PT Multimas Nabati Asahan, Paya Pasir	MNA, PPS
PT Multimas Nabati Sulawesi, Bitung	MNS, BTG
PT Sinar Alam Permai, Kumai	SAP, KMI
PT Sinar Alam Permai, Palembang	SAP, PLG
PT Usaha Inti Padang, Padang	UIP, PDG
PT Wilmar Cahaya Kalbar, Cikarang	WICA, CKR

Refinery	Code
PT Wilmar Cahaya Kalbar, Pontianak	WICA, PTK
PT Wilmar Nabati Indonesia, Bagendang	WINA, BGD
PT Wilmar Nabati Indonesia, Balikpapan	WINA, BLK
PT Wilmar Nabati Indonesia, Dumai	WINA, DMI
PT Wilmar Nabati Indonesia, Gresik	WINA, GSK
PT Wilmar Nabati Indonesia, Padang	WINA, PDG
PT Wilmar Nabati Indonesia, Pelintung	WINA, PLT

In total there are 9.15 million metric tonnes (mt) of crude palm oil (CPO) and 1.22 million mt of palm kernel oil (PKO) from its Indonesian refineries that are traceable at least to mills.

Malaysia



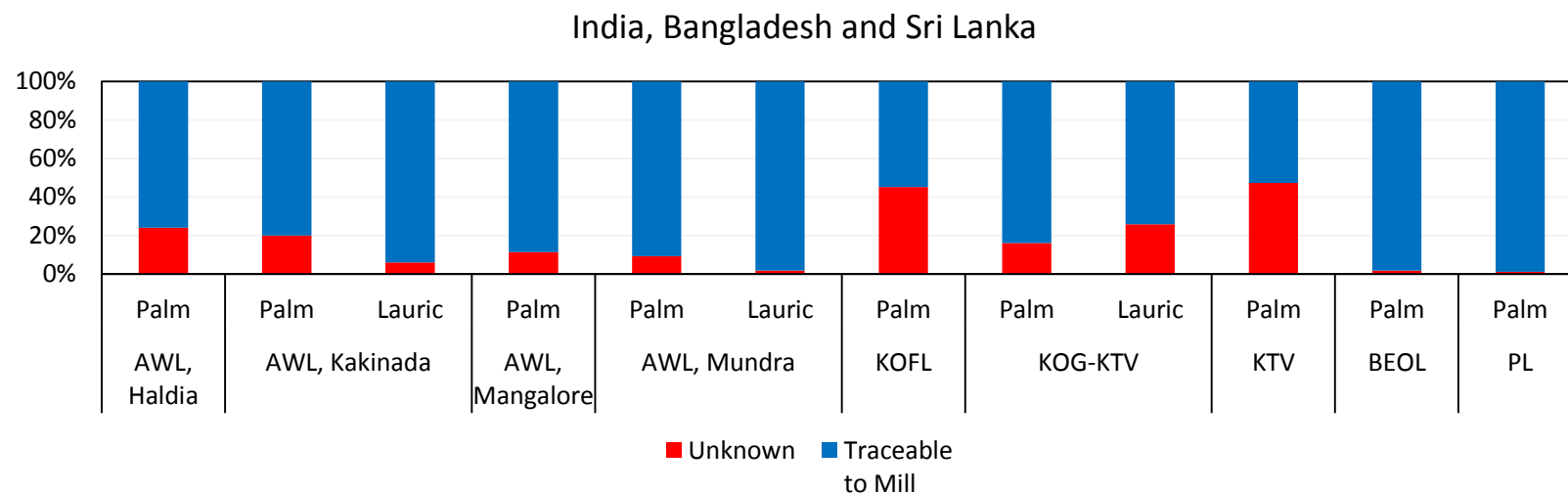
LEGEND

Refinery	Code
Bintulu Edible Oils Sdn Bhd, Bintulu	BEO
Lahad Datu Edible Oils Sdn Bhd, Lahad Datu	LDEO
Natural Oleochemicals Sdn Bhd, Pasir Gudang	NatOleo
PGEO (Lumut Division)Edible Oils Sdn Bhd, Lumut	PGEO, Lumut
PGEO Edible Oils Sdn Bhd, Pasir Gudang	PGEO, Pasir Gudang

Refinery	Code
PGEO (Prai Division)Edible Oils Sdn Bhd, Prai	PGEO, Prai
Sandakan Edible Oils Sdn Bhd, Sandakan	SEO
TSH-Wilmar Sdn Bhd, Kunak	TSHW
Wilmar Edible Oils Sdn Bhd, Butterworth	WEO

In total, there are 5.91 million mt of CPO and 0.63 million mt of PKO from its Malaysian refineries that are traceable at least to mills..

India, Bangladesh and Sri Lanka



LEGEND

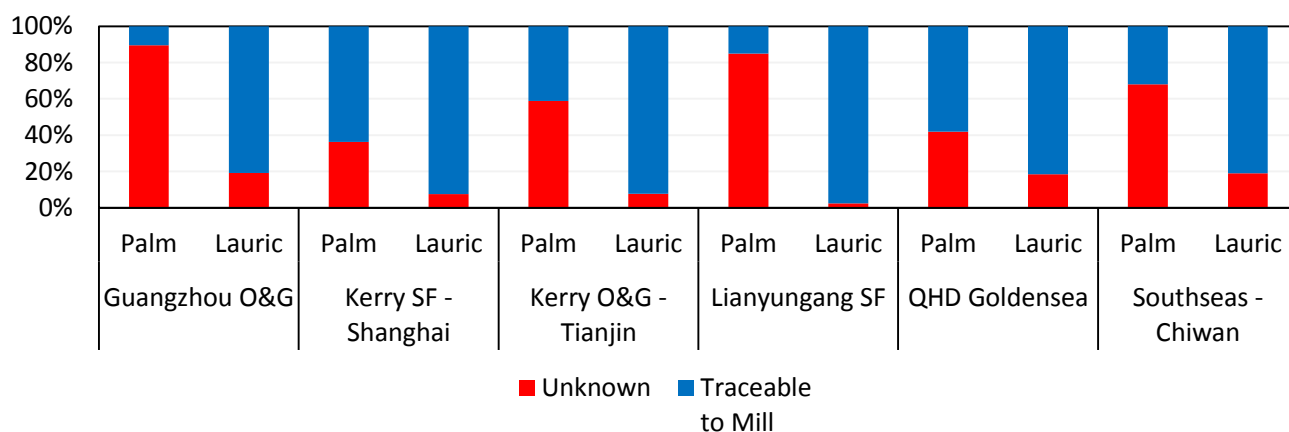
Refinery	Code
Adani Wilmar Limited, Haldia	AWL, Haldia
Adani Wilmar Limited, Kakinada	AWL, Kakinada
Adani Wilmar Limited, Mangalore	AWL, Mangalore
Adani Wilmar Limited, Mundra	AWL, Mundra
Krishnapatnam Oils and Fats Pvt Ltd , Nellore	KOFL

Refinery	Code
KOG - KTV Foodstuffs (I) Pvt Ltd, Tuticorin	KOG-KTV
KTV Health Food Pvt Ltd, Chennai	KTV
Bangladesh Edible Oil Limited	BEOL
Pyramid Lanka (Private) Limited	PL

In total, there are 0.81 million tonnes of palm products and 0.06 million tonnes of lauric products entering the above refineries that are traceable at least to mills.

China

China - Specialty Fats

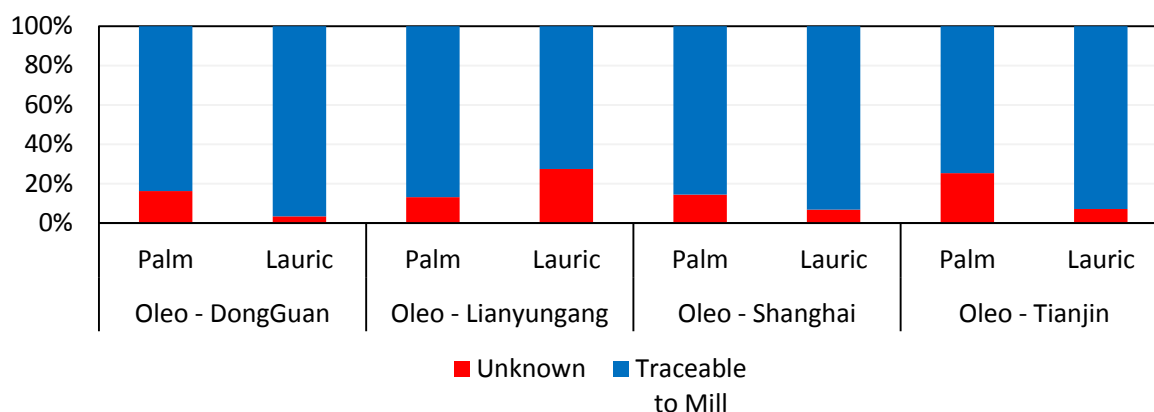


LEGEND

Refinery	Code
Yihai (Guangzhou) Oils & Grains Industries Co Ltd	Guangzhou O&G
Kerry Speciality Fats (Shanghai) Ltd	Kerry SF - Shanghai
Kerry Oils & Grains (Tianjin) Ltd	Kerry O&G - Tianjin
Yihai (Lianyungang) Speciality Fats Industries Co.Ltd	Lianyungang SF
Qinhuangdao Goldensea Foodstuff Industries Co Ltd	QHD Goldensea
Southseas Oils & Fats Industrial (Chiwan) Ltd	Southseas - Chiwan

In total, there are 0.33 million mt of palm products and 0.13 million mt of lauric products entering the above refineries in China that are traceable at least to mills.

China - Oleochemicals



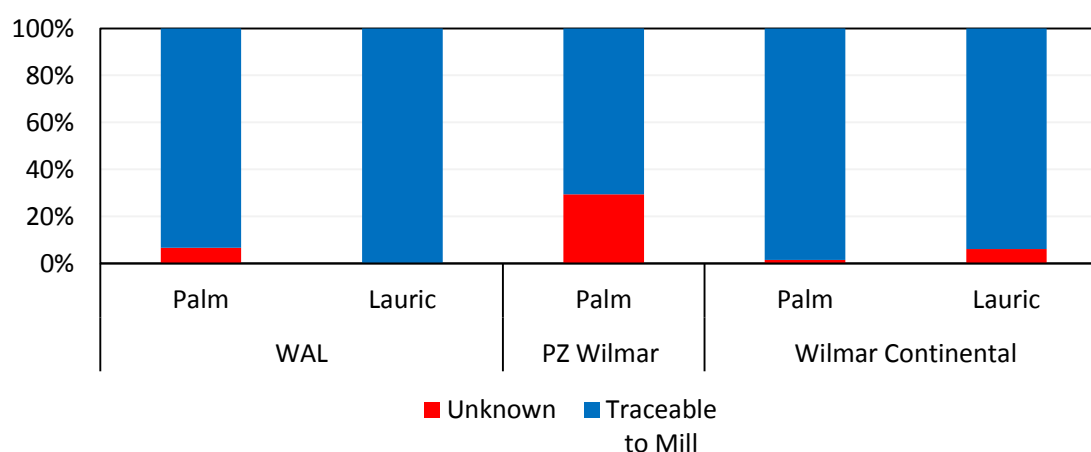
LEGEND

Refinery	Code
Wilmar Oleochemical (Dongguan) Co., Ltd	Oleo - Dongguan
Wilmar Oleochemical (Lianyungang) Co., Ltd & Sasol Yihai (Lianyungang) Alcohol Industries Co., Ltd	Oleo - Lianyungang
Wilmar Oleochemical (Shanghai) Co., Ltd	Oleo - Shanghai
Wilmar Oleochemical (Tianjin) Co., Ltd	Oleo - Tianjin

In total, there are 0.36 million mt of palm products and 0.11 million mt of lauric products entering the above refineries in China that are traceable at least to mills.

Africa

Ghana, Nigeria and South Africa

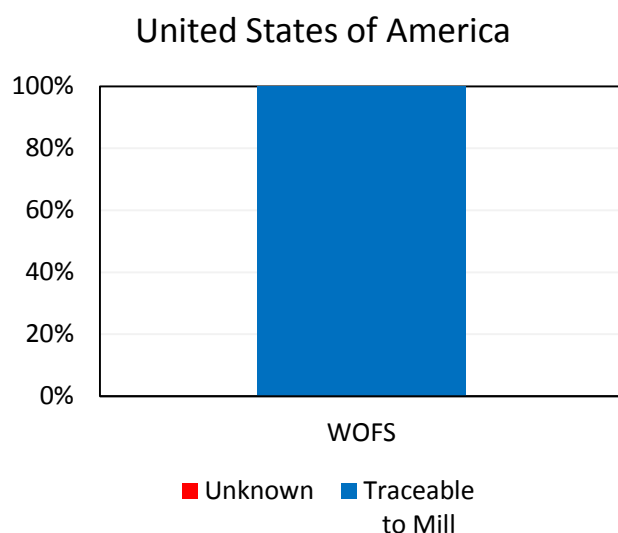


LEGEND

Refinery	Code
Wilmar Africa Limited	WAL
PZ Wilmar Ltd	PZ Wilmar
Wilmar Continental Edible Oils & Fats (Pty) Limited	Wilmar Continental

In total, there are 0.57 million tonnes of palm products and 0.02 million tonnes of lauric products entering the above refineries in Africa that are traceable at least to mills.

United States of America

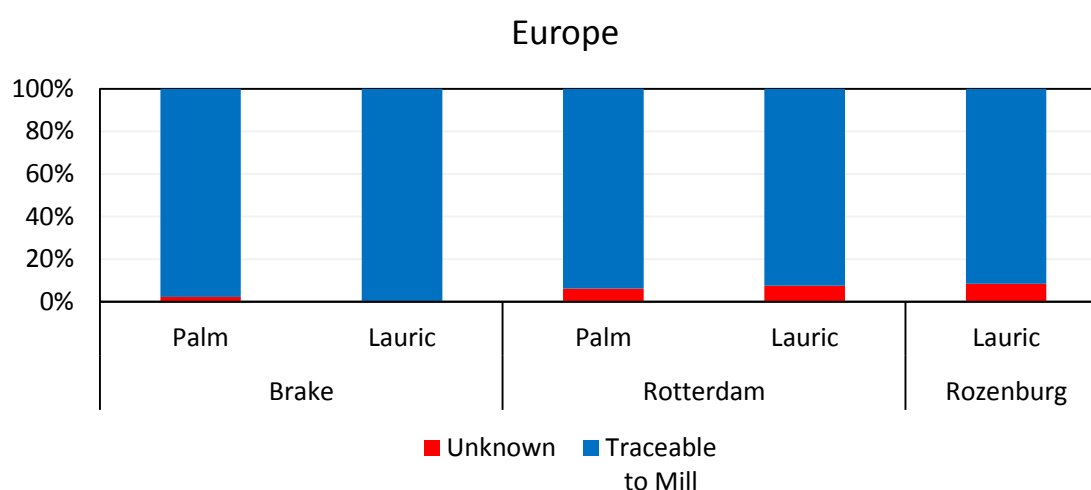


LEGEND

Refinery	Code
Wilmar Oils & Fats (Stockton) LLC	WOFS

In total, there are 0.03 million mt of palm products entering the above refinery in United States of America that are traceable at least to mills.

Europe

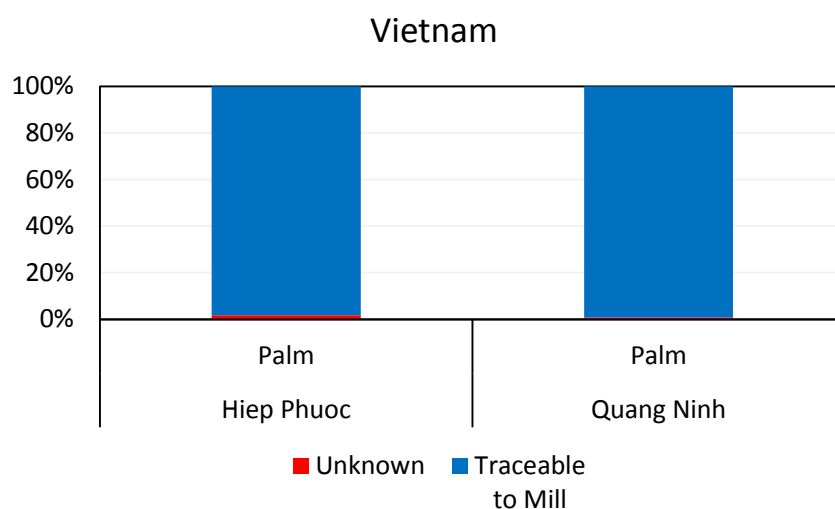


LEGEND

Refinery	Code
Wilmar Edible Oils GmbH	Brake
Wilmar Edible Oils BV	Rotterdam
Wilmar Oleochemicals BV	Rozenburg

In total, there are 0.75 million mt of palm products and 0.12 million mt of lauric products entering the above refineries in Europe that are traceable at least to mills.

Vietnam

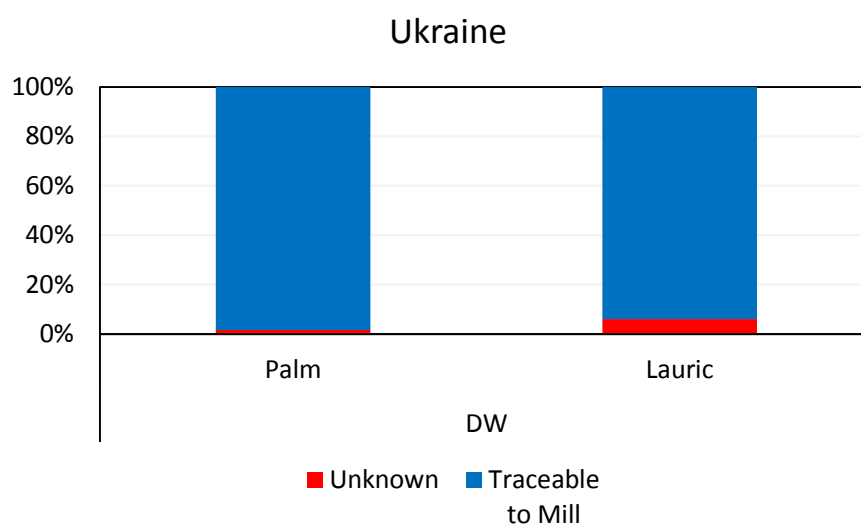


LEGEND

Refinery	Code
Calofic Hiep Phuoc	Hiep Phuoc
Calofic Quang Ninh	Quang Ninh

In total, there are 0.31 million mt of palm products entering the above refineries in Vietnam that are traceable at least to mills.

Ukraine*



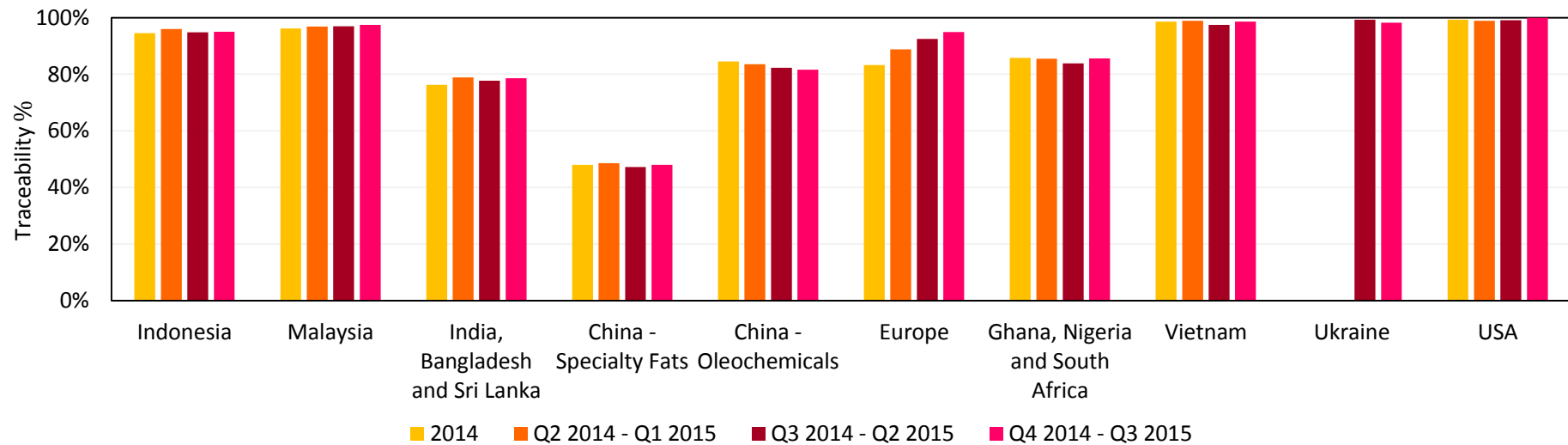
*Data based on shipment volumes received from January 2015 to September 2015

LEGEND

Refinery	Code
Delta Wilmar CIS Ltd	DW

In total, there are 0.14 million mt of palm products and 0.006 million mt of lauric products entering the above refineries in Ukraine that are traceable at least to mills.

The following graph represents our progress from the time we started our traceability reporting back to mills in 2014.



2. Smallholder Support Programmes

Incentivising Sustainability for Smallholders

The Sustainable Palm Oil and Traceability with Sabah small producers (SPOTS) project was launched in RSPO RT13 meeting in November 2015. A collaboration between Wild Asia, L'oreal, Clariant and Wilmar, SPOTS is an expansion of an existing partnership between Wilmar and Wild Asia in the Beluran district of Sabah, to certify smallholder farmers via a group certification scheme. Smallholders will be incentivised to participate through premiums for sustainably produced Fresh Fruit Bunches (FFB), as well as support in the form of agronomic advice and extension services to improve productivity.

This project targets approximately 500 smallholders for RSPO certification, and will produce about 70,000MT of FFB by 2020. As of September 2015, 198 smallholders and three smallgrowers have been RSPO certified.

Indonesian Palm Oil Platform (InPOP)

InPOP was set up by the Indonesian Ministry of Agriculture to promote sustainability in the national palm oil supply chain. One of InPOP's objectives is to enhance smallholder capacity in areas such as best agricultural practices, access to quality inputs and credit, and understanding about the legality of land use etc. InPOP participants include government agencies, NGOs, businesses and international organisations. Wilmar is one of a handful of InPOP private sector partners.

In November 2015, Wilmar visited smallholder suppliers for our PT Sinar Siak Dian Permai mill in Riau together with our InPOP partners, the United Nations Development Programme (UNDP) and the Indonesian Sustainable Palm Oil (ISPO) secretariat. One of the key challenges faced by these smallholders is in meeting land tenure and legality requirements in the province. The resolution of this issue will require coordination among the multiple government agencies involved. Wilmar is committed to facilitating this process and helping our smallholder suppliers overcome legality issues through our participation in InPOP.

Fertiliser Credit Scheme

In December 2015, Wilmar's Reka Halus mill in Sabah, East Malaysia, piloted a fertiliser credit scheme to provide its smallholder suppliers with access to fertiliser at wholesale prices, with application advice and monitoring.

In this scheme, the mill supplies fertilisers to smallholders on credit, and deducts a sum from the smallholders' sales for three consecutive months. This leaves smallholders with a considerably good income in the first three months, and would be financially beneficial in the long run due to productivity improvements.

Leveraging on our experience in Reka Halus, Wilmar will be looking to expanding and roll out the fertiliser credit scheme in our other mills in 2016 and beyond.

3. High Conservation Value (HCV) and High Carbon Stock (HCS) Forest Conservation

Wilmar has approximately 30,000 ha of conservation areas across our operations in Indonesia, Malaysia and Africa. These conservation areas are continuously being managed and maintained.

Conservation of Orangutans through Tripartite Partnership

Orangutan habitats were identified in parts of our concessions in Central Kalimantan; these areas were earmarked as High Conservation Value (HCV) to be set aside. Wilmar collaborated with the provincial government of Central Kalimantan and the Borneo Orangutan Survival Foundation (BOSF), to better safeguard these HCV areas and ensure that orangutan populations are able to thrive. Best Management Practices (BMP) for orangutan conservation were developed, and used as a guide for stakeholders.

On 25 November 2015, a signing ceremony was conducted to extend the existing tripartite partnership. With this extension, we will continue the process of engagement with neighbouring villages to reach an agreement on the cooperative management of the HCV area. Wilmar will also lead the development of similar BMPs for other plantation companies in Central Kalimantan.

Southeast Asia Rainforest Research Partnership (SEARRP)

Wilmar has been working with SEARRP to study the impacts of oil palm plantation development on forest biodiversity and the value of keeping conservation areas in plantations. In November 2015, we hosted a field trip to the conservation areas around our plantation in Sabah, Malaysia, to illustrate findings of the research. SEARRP and Wilmar management also discussed ways to integrate these findings into plantation management.

We are encouraged by the success of this partnership, and will participate in more projects with SEARRP on the assessment and maintenance of conservation values and ecosystem functioning in agricultural landscapes, and the sustainable management of oil palm plantations and their embedded forest patches and riparian reserves.

4. Stakeholder Engagement

Multi-stakeholder Platforms

Wilmar has been an active participant in a variety of multi-stakeholder platforms, such as the Indonesian Palm Oil Pledge and the Tropical Forest Alliance 2020, which seeks to advance the sustainability agenda.

In November 2015, Wilmar's Executive Vice-Chairman – China gave an opening address at the Banking and Environment Initiative's Greening the Finance of China's Commodity Imports workshop. The purpose of this workshop was to help the China Banking Regulatory Commission (CBRC), China Banking Association (CBA) and banks offering trade finance services in China identify measures that would incentivise the import of sustainably produced commodities into China. Wilmar's Chief Operating Officer also graced the event, and engaged with officials from China's Ministry of Commerce, senior representatives from CBRC, CBA, international NGOs, etc. Wilmar is committed to work with the Chinese

government and banks to expedite the “greening” of China’s commodity imports, which fits well into China’s long term plans.

NGO Engagement

During the RSPO RT13 in November 2015, Wilmar held a series of bilateral meetings with prominent international NGOs to update them on the implementation progress of our Integrated Policy and seek their feedback on areas for improvements. The meetings were also useful in aligning expectations for 2016 and beyond, and helped surface up-and-coming issues that the NGOs would be focusing on.

5. Policy Compliance and Grievance Procedure

Aggregator Refinery Transformation (ART) Approach in Indonesia and Malaysia

Wilmar implements the ART approach developed with TFT to improve supplier compliance. ART involves consolidating the results of regional mill assessments into a wider generalised report that is shared to all Wilmar suppliers in the region. Its objective is to provide a collaborative framework of solutions and shared best practices to common issues faced by mills and growers in a region.

In Q4 2015, we completed the final mill assessments to the 10% sample of mills supplying our Pasir Gudang refinery in Malaysia (eight visited in total), and completed the final visits to the sample of 13 mills supplying our Gresik refinery in Indonesia. We also completed the final visits to the sample of 15 mills supplying our Paya Pasir and Kuala Tanjung refineries. Two further supplier meetings took place with suppliers to our Sabah refineries, the full mill visits for which were conducted in 2014. The focus for 2016 will be on following the progress of the visited entities as well as sharing the findings from the visits with the unvisited mills in the refinery supply bases, in order to bring about transformation. Desktop assessments are in progress for other Wilmar refineries, and field visits will follow in 2016.

Progress in Africa

TFT returned to PZ Wilmar plantation operations in Nigeria to evaluate progress on the action plan and help accelerate its implementation. Discussions with local communities in Ibiae estate continued and an MoU between Wilmar and the communities was signed. The compensation agreed in Calaro with the communities was reviewed to ensure proper implementation and HCS maps were verified on the ground. The buffer zone between the Oban concession and Cross River National Park was visited for validation and final recommendations were made.

In Uganda, another visit to Oil Palm Uganda Limited’s (OPUL) operations was conducted in order to monitor the implementation of improvements. The new Community Liaison Officer was briefed on the Wilmar policy and work plan. The smallholder assessment report, including results from the interviews with 161 farmers, has been shared with stakeholders.

Socialisation of Grievance Procedure with NGOs

Wilmar has continued socialising our grievance procedure with local and international NGOs in Malaysia and Indonesia. Three separate engagement sessions were carried out, in Kota

Kinabalu, East Malaysia (20 October 2015), Kuala Lumpur, Malaysia (18 November 2015), and Balikpapan, Indonesia (8 December 2015). These meetings were to explain our grievance procedure to NGOs, and seek their support in using it to facilitate the monitoring of our supply base.

Grievance Cases

Four new grievance cases were logged in Q4. We have started our engagement process with the companies involved, and have so far received good cooperation from our suppliers in our mutual objective of resolving these cases quickly and transparently. 19 cases were registered since the launch of our Grievance Procedure. Stakeholders can view our full list of grievance cases, and follow the latest developments in our handling of these cases via our sustainability dashboard.

Since December 2015, we also started publishing a list of complaints cases related to our operations or those of our suppliers, which are being handled by the RSPO Complaints System, on our dashboard. This is part of our efforts to increase transparency and facilitate monitoring of all RSPO complaints cases pertaining to Wilmar and our suppliers by stakeholders.

Wilmar will review the Grievance Procedure in Q1 2016, to incorporate lessons learnt since its launch in 2015.

Capacity Building

Free, Prior and Informed Consent (FPIC) is a key component of our Integrated Policy. In November and December 2015, together with TFT, we conducted in depth trainings on the FPIC process for our employees in Sumatra and Jakarta, Indonesia. This is part of our ongoing efforts to familiarise our employees with our policy commitments and equip them with skills and knowledge in handling issues related to FPIC.

6. Recognition and Awards

In recognition of our sustainability efforts in 2015, Wilmar received a Sustainable Business Award at the Singapore Sustainability Awards 2015, organised by the Singapore Business Federation. This is in addition to the Special Recognition Award, in the large organisations category, we received at the Singapore Apex CSR Awards 2015.