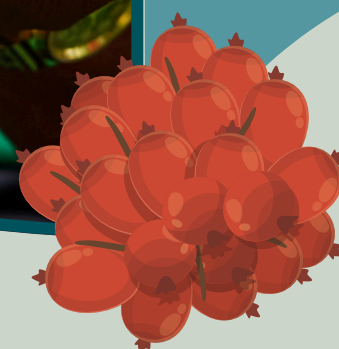
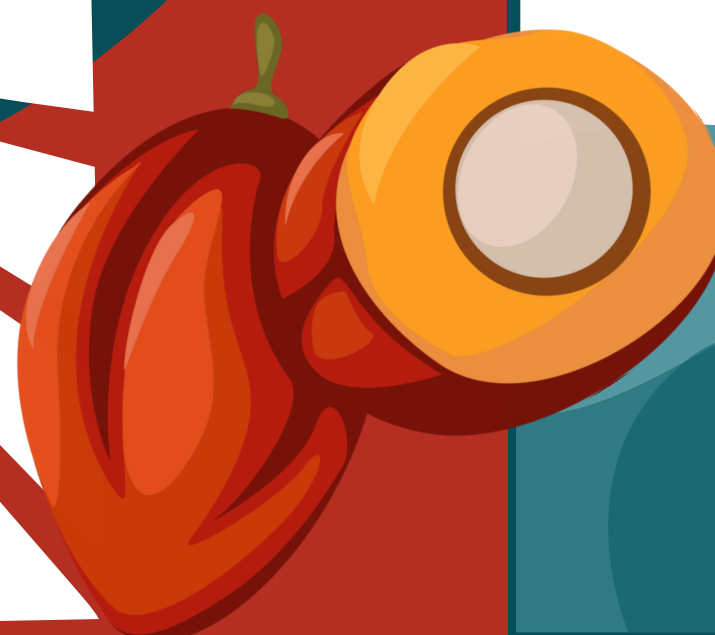




2025-2026 UPDATE

# TIMEBOUND ACTION PLAN





# OUR PROGRESS

Sustainability is at the heart of our business and shapes every aspect of our strategy, operations, and decision-making. Our commitment to creating positive change is driven by four key priorities:

- Environmental protection
- Supporting people and communities
- Delivering high-quality products
- Transforming our supply chain

This commitment is embedded throughout our organisation from strategic oversight by our Board of Directors to daily operational practices and responsible sourcing initiatives. Guided by our philosophy of maximising stakeholder value while minimising environmental impact, we align our practices to globally recognised environmental and social standards.

Our No Deforestation, No Peat, No Exploitation (**NDPE**) Policy underpins our global operations and supply chain management. By collaborating with industry peers, consumer goods companies, and non-governmental organisations (NGOs), we work to ensure our supply chain contributes to lasting, positive change. We view sustainability as a core business imperative and adopt a holistic approach to building resilient livelihoods in the rural communities where we operate. This includes upholding human rights, advancing climate change mitigation efforts, and maintaining deforestation-free supply chains.

In today's complex and interconnected world, ethical leadership and robust sustainability values are more vital than ever. At Wilmar, we stand firmly committed to transparency, accountability, and responsible business practices as the foundation long-term success.





# INTRODUCTION

Our 2025-2026 timebound plan is aligned with the Transforming Our Supply Chain chapter in Wilmar's **Sustainability Report 2024** and the **Palm NDPE Implementation Annual Report 2024**. This plan should be read in conjunction with both reports.

Wilmar's timebound plan is anchored on three key principles:



## GOVERNANCE

Establishing an appropriate governance structure, controls and oversight of our business is essential to safeguard the interest of all our stakeholders.



## RESPONSIBLE SOURCING & SUPPLY CHAIN TRANSFORMATION

Ensuring responsible sourcing activities by creating a traceable and transparent supply chain is vital to promote inclusiveness. We do this by monitoring and engaging with suppliers to empower them to meet high sustainability standards through capacity building.



## TRANSPARENCY & ACCOUNTABILITY

Monitoring and reporting our progress transparently and regularly demonstrate our commitment to operating a responsible and sustainable business.







## Sustainability Governance

### Material Topic

Approach to sustainability is overseen by the Chairman and Chief Executive Officer (CEO), and the Board of Directors, with the support of the Board Sustainability Committee (BSC).

### Approach

The BSC is responsible for developing Environmental, Social and Governance (ESG) strategies, identifying ESG-related risks, assessing ESG performance and targets, and monitoring the implementation of ESG-related policies and practices.

### Key Actions (2025/2026)

- 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) with the support of Independent Sustainability Advisors (ISA).
- To further our commitment to sustainable value creation for stakeholders, the Group has incorporated relevant ESG targets into the annual performance reviews of Executive Directors and key management personnel. In FY2024, key ESG targets incorporated into performance reviews were related to issues such as Climate Change, Responsible Sourcing and Supply, Health and Safety, Business Ethics and Compliance as well as Talent Retention. These targets align with the broader set of material ESG topics identified by the Group.
- The Board Diversity Policy underscores, in addition to gender diversity, the value of diverse backgrounds in expertise, qualifications and experiences. As of 31 December 2024, 23.1% of our Directors, excluding an Alternate Director, were female.



## Traceability

### Material Topic

Committed to achieving:

- 100% traceability to mill (TtM) by 2025.
- 100% traceability to plantation (TtP) by 2025.

### Approach

To manage risks in our supply chain, understanding the origin of our raw materials is essential. While significant progress has been made over the years, achieving full transparency remains a challenge, especially within the intricate systems of commodity transportation and trade, particularly in markets like China and India.

TtP is a more intricate and granular process than TtM, as it requires comprehensive mapping of supply bases. The challenge is particularly pronounced for independent mills, which often depend on third-party plantations and smallholders. Our approach to TtP is based on a set of **traceability criteria** specific to each type of supplier. Initially, our efforts were centred on achieving full TtP within our mills. Since then, we have expanded our traceability initiatives to include our entire supply chain.

As of December 2024, we achieved 98.5% TtM and 91.0% TtP, representing approximately 26.0 and 24.0 million metric tonnes of palm and lauric products respectively across our global operations. These results keep us firmly on track to meet our 2025 traceability goals.

### Key Actions (2025/2026)

- Prioritise sourcing from suppliers who provide clear visibility into the origin of their products, reinforcing responsible sourcing across our entire supply chain.
- Encourage voluntary disclosure of concession maps by our direct third-party suppliers.
- Engage relevant stakeholders to identify deforestation risks for smallholders' fresh fruit bunches (FFB) supplies.
- Continue to request detailed traceability information for volumes received from third-party refiners, traders and bulkers.
- Consistently monitor supplier data to ensure compliance with our NDPE Policy.



# Grievances

## Material Topic

Achieve a 100% response rate for all grievances.

## Approach

Wilmar introduced our **grievance mechanism** in 2015 to enable stakeholders to raise concerns regarding adherence to our NDPE Policy in both our operations and those of our third-party suppliers. This mechanism has become an essential tool for monitoring compliance with our NDPE commitments throughout our operations and supply chain.

As at December 2024, there were 87 reported grievances of which 84 cases have been closed and three are in progress.

In 2019, Wilmar's **Grievance Procedure** was significantly updated to more succinctly address NDPE non-compliances through the following:

- Immediate suspension at group level for suppliers involved in verified cases of deforestation and/or new development on peatland, effective from 1 January 2019, based on Wilmar's "suspend first" approach
- Introduction of **re-entry criteria** to allow suppliers to re-enter Wilmar's supply chain following a suspension due to non-compliance with deforestation and peat development. This includes a commitment to recovery plans for past non-compliances from a cut-off date of 31 December 2015
- Launch of the **Guidance on Development of Recovery Plans** to guide our supplier on recovery plan development.

## Key Actions (2025/2026)

- Wilmar continuously aims to achieve a 100% response rate for all grievances raised, and to resolve open cases promptly and transparently. In 2024, our response rate was 100%.
- We publish investigations and findings of all validated cases on our **Sustainability Dashboard**, which is updated on an ongoing basis. We also conduct regular reviews of case studies to identify lessons learned and enhance our mechanism.



# Supplier Engagement

## Material Topic

Ensure compliance of all direct and indirect suppliers with our NDPE Policy. Similar and prevalent environmental, land, and labour issues are addressed through landscape programmes and case studies relevant to our supply chain.

\* Please refer to page 13 (subchapter on “Ongoing Engagement with Suppliers”) in our **Palm NDPE Implementation Annual Report** for more information.

## Approach

Wilmar's supplier engagement process outlines how we work with suppliers and hold them accountable to consistently deliver on expected milestones aligned with our NDPE commitments, at both operational and landscape levels. We will continue to engage directly with mills through our annual self-assessment questionnaire via the Supplier Reporting Tool (**SRT**), conduct field assessments on high priority mills and develop continuous improvement plans.

Through a baseline evaluation, we have developed a risk assessment procedure that allows us to prioritise engagement efforts with suppliers.

Progress is monitored annually through the SRT and bi-annually through on-the-ground investigations and satellite imagery. In line with our grievance mechanism and No Exploitation Protocol, issues that cannot be resolved satisfactorily through the regular action plan process are escalated to Wilmar's Grievance team for further action.

## Key Actions (2025/2026)

- Continue to implement SRT and supplier engagement programmes across global operations.
- Continue to conduct supplier training sessions and supplier engagement programmes across global operations where relevant.
- Ensure a thorough due diligence process for potential supplying mills before entering Wilmar's supply chain.
- Adopt a Group-level approach to supply chain transformation, including managing non-compliant suppliers.



# Landscape Projects

## Material Topic

Wilmar continuously seeks new partnerships and opportunities to collaborate with others who can help us deliver on our commitments.

\* Please refer to page 22 (subchapter on “Landscape-level Initiatives”) in our [Palm NDPE Implementation Annual Report](#) for more information.

## Approach

Addressing sustainability challenges within the palm oil industry requires strategies and solutions rooted in the landscape approach—one that considers entire landscapes and jurisdictions where we operate, integrates core NDPE and broader sustainability goals and involves active partnerships and collaborations.

The importance of the landscape and jurisdictional approach lies in its ability to address complex, interconnected challenges that extend beyond the scope of any single company. Deforestation, biodiversity loss and greenhouse gas (GHG) emissions often occur at a scale that demands coordinated action across multiple stakeholders. This approach enables collective impact by uniting industry players, governments and local communities under a shared vision for sustainable development.

## Key Actions (2025/2026)

- Recognising the significance of the palm oil industry in Sabah, Wilmar actively contributes to the Sabah Jurisdictional Approach as a key collaborator and stakeholder.
- Active participant in various Roundtable on Sustainable Palm Oil and Malaysian Sustainable Palm Oil working groups that strive to improve standards and practices, and develop solutions to complex issues through a multi-stakeholder and participatory process.
- Part of the Palm Oil Collaboration Group (POCG) including the Production and Protection Beyond Concessions (PPBC) Working Group.
- Support the Private Sector Coalition for Green Siak and Siak–Palalawan Landscape Programme in Riau Province, Sumatra, focusing on sustainable palm oil production, environmental conservation and community development.
- Wilmar is also a member of initiatives such as Tropical Forest Alliance, United Nations Global Compact, Business for Social Responsibility (BSR), Round Table on Responsible Soy, and Bonsucro.
- In Indonesia, Wilmar promotes sustainable community-based forest management in Telaga Village Forest, Kalimantan, in collaboration with Community Forest Ecosystem Services. While in Malaysia, Wilmar supports the Sekar Imej Conservation Area Project in Sabah’s Sugut region, focusing on forest conservation and sustainable practices.



# Smallholders

## Material Topic

We are committed to ensuring that 100% of our independent smallholders covered by our programmes have access to best practices and expertise to help them achieve NDPE compliance and enhance their livelihoods.

\* Please refer to page 117 (Chapter on “Economic and Community Contribution”) in our **Sustainability Report 2024** for more information.

## Approach

To help smallholders become part of sustainable supply chains, we work with partners to create programmes that improve farming practices based on international standards.

Wilmar is committed to ensuring all scheme and independent smallholders in our programmes have access to expert guidance and best practices to meet our NDPE Policy.

We also support smallholders by offering long-term partnerships and buying their FFB directly. This helps build stable incomes and support their long-term success.

## Key Actions (2025/2026)

- Our scheme smallholder programmes focus on providing training and support for farmers to improve sustainability practices, increase yield per hectare and ultimately achieve certification.
- Our independent smallholder programmes are specific to each country and aim to address the unique challenges faced by farmers in their respective locations.
- In 2024, 100% of our scheme smallholders and 41.1% of our independent smallholders were supported by our capacity building programmes.



# Labour and Human Rights

## Material Topic

We are committed to recognising the inherent dignity of every individual and making continuous efforts to respect and safeguard the rights of all those involved in our value chain. This includes not only our employees and contractors but also temporary and migrant workers, as well as local communities in the areas surrounding our operations.

\* Please refer to page 76 (Chapter on “Human Rights and Labour Standards”) in our **Sustainability Report 2024** for more information.

## Approach

Given our global reach, enhancing labour standards is a key area of focus for us. Our approach to human rights is guided by our **Human Rights Framework** which outlines key policies to identify, prevent and manage our impact. In addition, we regularly carry out due diligence as part of our Human Rights Due Diligence approach.

To better protect vulnerable groups, we collaborate closely with human rights experts and civil society organisations to gather insights and feedback on our approach and progress. We also participate in multi-stakeholder platforms, collaborating with partners from across different sectors and value chains to collectively discuss and explore resolutions to address key challenges within the industry.

## Key Actions (2025/2026)

- Assess our suppliers through the SRT on elements such as the provision of food, water, accommodation, healthcare, transport, education and daycare to ensure all our employees are paid a living wage. In 2024, we assessed 100% of our employees and contractors to ensure that they are paid a living wage.
- Since 2017, we have partnered with Dignity in Work for All (formerly Verité Southeast Asia), a technical partner and labour rights expert, to identify potential root causes of issues such as child labour, the links between work and pay practices and emerging labour challenges.
- Pilot tools on ethical recruitment practices and conduct regular internal audits including evaluations of human rights and labour practices throughout our upstream and downstream operations.
- 100% of our palm oil plantations in Ghana, Indonesia, Malaysia and Nigeria have Women’s Working Groups or Gender Committees.
- In support of our commitment to child protection and addressing children’s rights and safety in the palm oil industry, we partnered with BSR and other consumer brand companies to develop and publish our Child Protection Policy Implementation Manual for Indonesia in 2020, followed by another version for Malaysia in 2023.



# Climate Change

## Material Topic

Taking actions to mitigate the impacts of climate change by reducing GHG emissions and adapting to regulatory and physical climate risks.

\* Please refer to pages 38-47 (Chapter on “Climate Change”) in our **Sustainability Report 2024** for more information.

## Approach

Recognising the potential impacts of climate change on our business and communities, Wilmar seeks to take tangible actions to build resilience and reduce the carbon footprint of our operations and value chain.

Our near- and long-term science-based emissions reduction targets are officially validated by the **Science Based Targets initiative (SBTi)**. These targets, approved under the SBTi Corporate Net-Zero Standard and the SBTi Forest, Land and Agriculture Guidance, commit us to absolute reductions in Scope 1 and 2 emissions, as well as Scope 3 emissions from our supply chain.

## Key Actions (2025/2026)

- Our data and disclosure frameworks are aligned with GHG Protocol and Taskforce on Climate-Related Financial Disclosures.
- We will continue to advocate for the recognition and adoption of the **Palm Oil Sectoral Roadmap** launched at COP27.
- In line with the palm oil sector's ambitious timeline of reducing GHG emissions from land use change by ending deforestation as noted in the Agriculture Sector Roadmap to 1.5-degree-Celcius published at COP27, Wilmar's action plan to shifting 100% of volumes into “Delivering” category using NDPE Implementation Reporting Framework (IRF) by 2025 can be found **here**.



## Reporting

### Material Topic

### Approach

### Key Actions (2025/2026)

Transparent and regular monitoring and reporting are essential in demonstrating our commitment to operating a responsible and sustainable business.

Aside from our Annual Reports and Sustainability Reports, the Wilmar Sustainability Dashboard is consistently updated with information related to certification, conservation, supply chain monitoring and NDPE compliance, grievances, traceability and more.

- Provide full transparency on our approach and progress towards delivering our NDPE commitments across our palm supply chain in our [Palm NDPE Implementation Annual Report 2024](#).
- To enhance stakeholders’ confidence in the data and information, we disclose material palm disclosures such as traceability to mill and plantation data, satellite monitoring and NDPE IRF disclosures amongst others, which have been assured by Control Union Certifications. Additionally, Ernst and Young has provided external assurance for other material ESG disclosures.

Compliance to our NDPE Policy.

Our verification framework is intended to increase transparency in the supply chain and demonstrate accountability to stakeholders. We continue to invest in new technologies to identify and track issues across our supply chain in real-time and provide deforestation alerts and impact data.

We continue to work with ISA comprising of independent sustainability experts and eminent individuals who provide on-the-ground support to execute and evaluate the implementation of our NDPE and other sustainability-related policies.

- WILMAR SHALL PROACTIVELY AND CONTINUALLY monitor our supply chain to ensure compliance to our NDPE policy.
- In line with our deforestation-free commitment, Wilmar proactively monitors all suppliers through multiple third-party satellite monitoring systems.



# WAY FORWARD

The past year has been one of significant transformation and resilience for businesses like Wilmar as we navigate an increasingly complex global landscape. Amid heightened geopolitical shifts, evolving regulatory demands and an escalating urgency for climate action, Wilmar remains steadfast in our commitment to sustainability. We view these challenges as catalysts to strengthen our leadership in sustainability, drive innovation and deepen our partnerships and collaborations.

As a prominent player in the global agrifood industry with a presence across the entire value chain, Wilmar holds a strategic advantage in leveraging our resources and knowledge to deliver positive outcomes for our stakeholders across all areas of operation.

As we look towards 2025 and beyond, we remain focused on building on our progress, strengthening partnerships and driving innovation in sustainable business practices. Our achievements are made possible through the dedication of our management and staff, the support of our valued stakeholders, and the guidance of our Board of Directors. We are deeply grateful for your continued trust as we advance together on our shared sustainability journey.







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