



## **SUMMARY OF PROGRESS**



MONITORING

>23.1\* MILLION

**HECTARES (HA)** of land covered by satellite monitoring in Indonesia, Malaysia and other palm-producing countries1

1,018\*

**GROUPS** MONITORED 7,921\*

**PLANTATION** UNITS MONITORED



917 (100%)

SUPPLIERS ASSESSED

906\* (98.8%)

SUPPLIERS ASSESSED **AS LOW-PRIORITY** MILLS

11\* (1.2%)

**SUPPLIERS** HIGH-PRIORITY MILLS

high-priority mills engaged (e.g. field visit, improvement plan follow-up, meeting, email correspondence, etc.)

1,047 SUPPLIERS TRAINED ON NOPE IMPLEMENTATION SINCE 2015



APPROACH TO **SUPPLIER** NON-COMPLIANCE

SUPPLIER GROUPS 34 SUSPENDED SINCE 2015

10 **SUPPLIER GROUPS** REMAIN **ON OUR** SUSPENSION

LIST

(covering 1.3

million ha of oil palm plantations)

**GROUPS** (covering 1.3 million ha of oil palm plantations) met Wilmar's re-

entry criteria

12

SUPPLIER GROUPS

have been suspended since the approach effective 2019

2.6

SUPPLIER

24

introduction of our "suspend first"

oil palm plantations removed from our supply chain due to suspension since 2015

Limited assurance conducted by CU.

Other palm producing countries include Brazil, Cameroon, Colombia, Costa Rica, Democratic Republic of the Congo, India, Ghana, Guatemala, Honduras, Ivory Coast, Liberia, Mexico, Nicaragua, Nigeria, Papua New Guinea, Sao Tome and Principe, Sierra Leone, Solomon Islands, Sri Lanka and Thailand.







**DELIVERING ON NDPE IMPLEMENTATION** REPORTING FRAMEWORK (NDPE IRF) 95.9%\*

OF PALM AND LAURIC PRODUCT VOLUMES **ACROSS WILMAR'S GLOBAL SUPPLY CHAIN** 



have achieved "Delivering" status for both No Deforestation and No Peat requirements using the NDPE IRF

Limited assurance conducted by CU.

## INTRODUCTION



## **Global Context**

Palm oil is a highly versatile and efficient oil crop, capable of producing more oil per hectare (ha) than alternative oilseeds almost all year round. This helps meet the ever-growing global demand for food, personal care products, biofuels and more. Beyond its commercial value, palm oil is a vital source of income for millions of farmers, workers and communities worldwide.

At the same time, we recognise the environmental and social challenges associated with palm oil production such as deforestation, biodiversity loss and exploitation risks. However, these issues can be effectively managed with responsible practices.

Sustainability is at the core of our operations, guided by our No Deforestation, No Peat, No Exploitation (NDPE) commitment since 2013. We continuously strengthen our efforts in addressing potential challenges, invest in traceability, work with farmers on sustainable practices as well as champion human and labour rights. At Wilmar, our mission is to produce palm oil responsibly, balancing the needs of people and nature.

# Commitment to No Deforestation, No Peat, No Exploitation

Our NDPE Policy has been a cornerstone of our sustainability approach since 2013. Wilmar was the first in the industry to adopt a NDPE commitment that extended beyond our own operations to include joint ventures, regardless of shareholding, and third-party suppliers. Over the years, we have strengthened our commitment, refining policies and procedures to address emerging challenges and lead the development of best NDPE practices in the industry.

Our goal is to achieve a supply chain free of deforestation, peatland degradation and social exploitation. Achieving this requires transparency, accountability and collaboration across all levels. 2024 marked the 11th year of implementing NDPE, reinforcing our long-term dedication to responsible palm oil production.

We continue to closely monitor and manage our suppliers on their compliance with our NDPE Policy, actively engaging them through training and raising awareness on our NDPE expectations. Existing suppliers undergo assessments where relevant and necessary, while all new suppliers are subjected to a rigorous due diligence process. This allows us to incrementally transform our supply chain to improve traceability and alignment with our sustainability goals.

Traceability remains a key focus, serving as an important first step in mapping our supply to specific palm oil mills and eventually to plantations, enabling us to evaluate suppliers' performance against our NDPE Policy.

Beyond continually bolstering our supplier monitoring, we proactively identify and assess high-risk suppliers and work with them to improve their operations. When compliance issues arise, we take decisive action which may include removing noncompliant suppliers from our supply chain.

Industry-wide efforts such as the Agriculture Sector Roadmap to 1.5-degree Celsius, launched at COP27 in 2022, have demonstrated the value of collective action in reducing deforestation and mitigating climate impacts. Studies have also highlighted tangible benefits from NDPE commitments, such as a significant slowdown in deforestation in key regions and the preservation of millions of hectares of forestland.

## The European Union Deforestation Regulation

As part of our commitment to deforestation-free practices, we closely monitor our operations and third-party suppliers at the group level<sup>2</sup> using satellite monitoring. Verified cases of deforestation or new peatland development result in immediate group-level suspension, in line with our "suspend first" approach. This aligns with our broader NDPE Policy and extends to conserving biodiversity across our operations and supply chain.

We welcome and support the EUDR as a crucial step in encouraging the consumption of deforestation-free products and addressing global deforestation and forest degradation.

Throughout 2024, we actively engaged with European Union authorities and industry associations to share our knowledge, experiences, challenges, concerns, and recommendations on the implementation of the regulation. This engagement allowed us to contribute valuable insights and have our perspectives considered in the regulatory process.

In addition, we actively engaged with our suppliers, who play a crucial role in making sustainable agriculture and food production a reality. By working closely with them, we aim to promote sustainable practices, improve transparency and support the collective goal of building a more sustainable and responsible supply chain.

2 Wilmar has adopted the RSPO's definition of "group".

## **About This Report**

Wilmar adopts a data-driven approach, consistently aiming to deliver the highest levels of clarity, accuracy, and transparency in the data and information we disclose.

This Report provides up-to-date progress relating to certification, conservation, supply chain monitoring, NDPE compliance, grievances and traceability. It contains data and information from the financial year from 1 January 2024 to 31 December 2024 and may reference events in previous years, where relevant.

This Report should be read together with our Annual Report 2024 and Sustainability Report 2024 as an integrated suite of reporting materials. More information can also be found on our Sustainability Dashboard.

Material palm disclosures such as traceability to mill and plantation data, satellite monitoring efforts and the NDPE IRF disclosures, amongst others, have been assured by Control Union Certifications (CU). Other material ESG disclosures have been externally assured by Ernst and Young (EY). For details on the assurance from CU, please refer to pages 30 to 31 of this Report. For details on external assurance from EY, please refer to pages 164 to 165 of our Sustainability Report 2024.

In line with SGX's sustainability reporting requirements, Wilmar's external assurance covers all key aspects of Wilmar's sustainability disclosures. Based on this approach, no further internal review has been conducted, as determined by Wilmar's internal assessment.

## NDPE IMPLEMENTATION

## **Traceability**

The palm oil supply chain is complex, spanning millions of smallholders to large corporations. Today, more than seven million smallholders<sup>3</sup> around the world make a living from oil palm and contribute about 35.0% to 40.0% of global palm oil supply. In major producing countries such as Indonesia, the supply chain consists of a network of small-scale growers and intermediaries. While each plays a crucial role, they contribute to the industry's fragmented nature. Tracking the journey of palm oil from these smallholders to global markets is particularly challenging due to the complex network of growers, agents, and intermediaries.

As Wilmar sources over 90.0% of our palm oil from third-party suppliers, traceability goes beyond being a logistical requirement—it is a crucial step towards enhanced sustainability. Mapping the supply chain back to the mills and eventually to plantations ensures the enforcement of vital policies like our NDPE Policy. Beyond compliance, traceability also enables us to provide targeted support to smallholders to improve their practices and yields while safeguarding the environment and communities.

As the world's largest palm oil trader, Wilmar recognises that supply chain transformation presents both a significant challenge and an immense opportunity to driving meaningful change.

## Traceability to Mill

To manage risks in our supply chain, understanding the origin of our raw materials is essential. Wilmar is committed to achieving a fully traceable and transparent supply chain, initially setting the goal of 100% traceability to mill (TtM) for all volumes handled by our refineries by 2015.

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. As of December 2024, we have achieved 98.5%\* TtM for crude palm oil (CPO) and palm kernel oil (PKO), representing approximately

26.0\* million MT of palm and lauric products traceable to mill across our global operations.

Closing the gap to 100% TtM requires close collaboration with our suppliers and the implementation of robust processes to address systemic challenges. We remain firmly committed to achieving this goal and have revised our target of full traceability to palm oil mill by 2025.

Our approach to full traceability involves requesting detailed traceability information for volumes received from third-party refiners, traders and bulkers. Wilmar's Sustainability Department then consistently monitors supplier data to ensure compliance with our NDPE Policy. In addition, our procurement practices prioritise sourcing from suppliers who provide clear visibility into the origin of their products, reinforcing responsible sourcing across our entire supply chain.

\* Limited assurance conducted by CU.





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## **Traceability to Plantation**

Traceability to plantation (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. These mills often face difficulty in engaging suppliers and collecting information about their supply base, compared to integrated mills that source from their own or affiliated plantations.

Both independent and integrated mills face systemic issues, such as inaccurate maps, unclear land titles and fragmented sourcing from smallholders and dealers, which further complicate efforts to achieve full TtP.

To address unique challenges faced by each mill, we have established specific **traceability criteria** for each type of category 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, and we are dedicated to reaching 100% TtP by 2025.

To accelerate progress, we are encouraging our suppliers to voluntarily disclose concession maps, assess deforestation risks associated with smallholder fresh fruit bunches (FFB) and collect data from traders and refiners from whom we make direct purchases using self-assessment tools.



Please refer to our 2024-2025 Timebound Action Plan for more details on our progress in building a traceable and transparent supply chain.

As of December 2024, we have achieved 91.0%\* TtP across our global operations, equivalent to about 24.0\* million MT of palm and lauric products, with 91.8% of third-party mill supplies also traceable to plantation level.<sup>4</sup> This keeps us on track to achieving our 2025 targets.

Wilmar's supply base

921 MILLS

877
THIRD-PARTY
MILLS

FFB SUPPLY TO MILLS	% OF THIRD-PARTY MILLS	% OF THIRD-PARTY VOLUMES, MILL BASIS
Own plantations	7.3%	5.8%
Third-party plantations	21.7%	24.3%
Own and third-party plantations	53.9%	63.9%
TOTAL	82.9%	94.0%

- Limited assurance conducted by CU.
- 4 While Wilmar does not publish nor share plantation data of third-party supplying mills, we have been reporting TtP percentages on a per refinery basis on our Sustainability Dashboard since 2015.

## Our Key Programmes in Ensuring Supplier Compliance

Successful implementation of our NDPE Policy requires active collaboration with our suppliers. To effectively monitor compliance and track progress across our entire supply chain, we adopt a three-pronged approach that includes:



## **Satellite Monitoring**

Satellite and drone technologies are effective tools that Wilmar and the broader palm oil industry leverage to monitor compliance with NDPE commitments. Advancements in satellite technology such as increasingly high-resolution image capture capabilities and improved sensors, as well as complementary technologies such as radar and laser provide more detailed and accurate information. Through satellite monitoring, we proactively monitor our 31,842 ha of set-aside conservation areas and our supplier operations.

In 2013, Wilmar launched the Supplier Group Compliance Programme (SGCP) with support from Earthqualizer to proactively detect deforestation and peatland development at the supplier group level. The SGCP monitors approximately 23.1 million ha across countries including Indonesia, Malaysia, Papua New Guinea, Brazil, Cameroon, Colombia, Costa Rica, Democratic Republic of the Congo, India, Ghana, Guatemala, Honduras, Ivory Coast, Liberia, Mexico, Nicaragua, Nigeria, Sao Tome and Principe, Sierra Leone, Solomon Islands, Sri Lanka and Thailand.

The programme tracks deforestation, peatland development and fire activity, providing alerts linked to specific concessions and responsible parties. When alerts are triggered, our grievance mechanism is activated to promptly investigate and address any non-compliance.

The SGCP forms part of our supplier compliance verification framework and is complemented by our **Supplier Reporting Tool (SRT)**, grievance mechanism and our collaboration with **Satelligence**. Since 2020, our work with Satelligence has enhanced the monitoring of deforestation and peatland development in both our own and suppliers' operations through providing notifications, historical and current deforestation risk analysis and updates on our progress towards sustainability goals.

In support of the broader industry, Wilmar joined nine other palm oil producers and buyers in 2019 to support and fund the development of Radar Alerts for Detecting Deforestation (RADD)<sup>5</sup> and verification protocols for when RADD alerts are triggered. RADD uses radar-based monitoring to capture forest changes across 44 countries in high resolution, enabling the early detection of deforestation and response action. RADD alerts are publicly available on World Resources Institute's Global Forest Watch (GFW) map platform.

 $5 \quad https://www.wri.org/news/release-palm-oil-industry-jointly-develop-radar-monitoring-technology-detect-deforestation$ 

## **Supplier Compliance and Due Diligence**

Our NDPE Policy applies to all third-party suppliers at the group level, with no exceptions. We were the first in the industry to publicly disclose a complete list of our supplying mills on our **Sustainability Dashboard**. To date, we have completed formal engagements with 100% of our group-level palm oil suppliers. Our procurement practices are regularly reviewed to ensure alignment with our NDPE policy and Supplier Guidelines. Internal engagements and trainings with Sustainability and Sourcing teams are also conducted to ensure effective communication with suppliers.

## **Due Diligence on Potential New Suppliers**

Wilmar conducts thorough due diligence on all potential new suppliers to ensure their alignment with NDPE standards before they are eligible to enter our supply chain. This due diligence process covers various environmental and social criteria and requires the collation of information, including but not limited to:



LOCATION AND PROXIMITY TO FOREST AND PEAT LANDSCAPE RISKS THROUGH CONCESSION MAPS OR SUPPLY CHAIN SOURCING INFORMATION



HIGH CONSERVATION VALUE (HCV) AND HIGH CARBON STOCK APPROACH (HCSA) ASSESSMENT, WHERE APPLICABLE



**LEGAL COMPLIANCE** 



TRACEABILITY DATA



PUBLIC INFORMATION ON POTENTIAL NON-COMPLIANCE OR GRIEVANCE

This process plays an important role in mitigating the risk of potential breaches to our NDPE Policy. Where allegations of non-compliance arise, we actively seek clarifications. If the allegations are verified, the supplier must resolve the issue or agree to a corrective action plan before being eligible to enter Wilmar's supply chain. Written confirmation of compliance with our NDPE Policy is also mandatory unless the supplier has publicly adopted our Policy in their operations.

## **Assessing Existing Suppliers Through Supplier Reporting Tool**

We assess our suppliers' progress and implementation of our NDPE Policy through our SRT. The SRT covers the following core NDPE elements and country-specific risks such as:

- · Access to grievance mechanisms
- Women's rights
- Child protection
- Environmental and biodiversity impact management including HCV, High Carbon Stock (HCS), fire and peat management and no burning
- Labour rights and standards including but not limited to forced labour and human trafficking, freedom of association and collective bargaining, non-discrimination, equal opportunities and fair living wages
- · Recruitment fees
- Legality
- Legal and customary (or traditional) land rights
- Commitment to protecting and respecting Human Rights Defenders
- · Occupational health and safety
- Traceability
- Sourcing practices

The SRT is an online self-reporting tool implemented annually to assess 100% of Wilmar's direct supplying mills, including our own mills and their associated estates. Results from the SRT form the basis of our **Human Rights Due Diligence (HRDD)** approach and enable us to identify potential environmental and social risks as well as potential negative impacts across the supply chain.

More information is available in our Sustainability Brief.



Wilmar employees from our operations in Uganda, Africa.

## **SRT PROCESS**



## 01 QUESTIONNAIRE REVIEW

Wilmar's Supplier Compliance team reviews and updates the questionnaire annually. The revised questionnaire is reviewed by relevant teams, including ESG, Grievance, Traceability, Conservation, Human Rights and Trading, across the business to ensure we effectively monitor and assess NDPE progress.



## 02 QUESTIONNAIRE LAUNCH

The questionnaire is disseminated to all Wilmar's supplying mills annually. To support our suppliers in completing the questionnaire, we follow up regularly through emails, physical and virtual meetings, phone calls and messages.



## 03 DATA COLLECTION AND ANALYSIS

Upon completion of the questionnaire, improvement plans and recommendations are generated for every direct supplying mill to address gaps. To ensure improvement plans are properly implemented, the Supplier Compliance team follows up regularly to support suppliers throughout the process.



## **04 RISK ASSESSMENTS**

To identify potential risks and negative impacts, our risk assessments are informed by SRT responses, mill certification status, NDPE commitment, TtP, SCGP data, grievances raised and GFW commodity risk geospatial analysis. Mills identified as high-priority are subjected to site assessments and/or direct engagement as part of our NDPE Policy implementation programme.

#### a) Site assessments

Site assessments are conducted at high-priority mills and plantations to validate SRT responses and obtain further insights into identified gaps. Site assessments are primarily conducted by Wilmar teams. However, third-party organisations or subject matter experts may be engaged, depending on the nature of the identified gaps.

The following activities are undertaken during site assessments:

- Opening meeting which includes a refresher on Wilmar's NDPE Policy
- Documentation reviews
- Observations of practices and conditions at the mills and plantations, including workplaces and housing/ living quarters
- Interviews with mill/plantation management staff
- Confidential interviews with mill/plantation workers (without the presence of management staff)
- Closing meeting which includes an initial summary of findings, feedback and guidance

To ensure that suppliers receive assessment results and feedback with minimal delay, a digital mobile audit tool is used to generate reports with improvement plans and recommendations.

#### b) Improvement plans

Improvement plans are developed to address identified issues following each site assessment. Suppliers are required to review and clarify findings as well as sign off on the proposed improvement plans. Progress is monitored annually through the SRT and bi-annually through on-the-ground investigations and satellite imagery. Issues that cannot be resolved satisfactorily are escalated to Wilmar's Grievance team for further action.

## **Ongoing Engagement with Suppliers**

Continuous supplier engagement is a key aspect of our strategy to ensure alignment with our NDPE Policy. Through our engagement process, we hold suppliers accountable for meeting milestones required to fulfil their NDPE commitments.



#### **Supplier Engagement in 2024 Number of** supplier mills **Total direct suppliers** 917\* 100\* Suppliers assessed as low-priority mills 906\* 98.8\* (Denominator: Total direct suppliers) Suppliers assessed as high-priority mills 11\* 1.2\* (Denominator: Total direct suppliers) Engagement with high-priority mills<sup>6</sup> 11\* 100\* (Denominator: Suppliers assessed as high-priority mills)

A deeper understanding and genuine buy-in of our NDPE principles are crucial for fostering sustainable, long-term alignment among our suppliers. To achieve this, we conduct programmes covering a range of critical topics including child protection, forced labour and ethical recruitment, conservation and peat management, occupational health and safety and traceability. Depending on the subject matter, sessions are delivered either virtually or in person and are led by Wilmar's teams or external experts with specialised knowledge.

Supplier capacity building on NDPE						
In 2024	Since the implementation of Wilmar's NDPE Policy					
31	111					
705 suppliers	1,047 suppliers					
	31 705					

- \* Limited assurance conducted by CU.
- 6 Examples of engagement include field verification or direct communication with suppliers on SRT improvement plans, among others.

## **Grievance Mechanism**

A robust grievance mechanism is an integral part of an effective sustainability approach. As a structured feedback process, it fosters transparency and accountability, creating opportunities to address concerns effectively and strengthen Wilmar's NDPE our operations and supply chain. implementation.

Wilmar introduced its 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

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



## **IMMEDIATE SUSPENSION** AT THE 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



## **COMMITMENT TO PROTECT HUMAN RIGHTS**

including human rights defenders, whistleblowers, complainants and community spokespersons, while ensuring a provision for anonymity



## **INTRODUCTION OF RE-ENTRY CRITERIA**

to allow suppliers to re-enter Wilmar's supply chain following a suspension due to non-compliance on deforestation and peat development. This includes a commitment to recovery plans for past non-compliances from a cut-off date of 31 December 2015



## **A STANDALONE HUMAN RIGHTS DEFENDERS**

policy published in 2021



## **LAUNCH OF THE NO EXPLOITATION PROTOCOL**

to address the "No Exploitation of People and Local Communities" aspect of our NDPE Policy



## A GUIDANCE ON DEVELOPMENT **OF RECOVERY PLAN**

released in 2023

To ensure that the grievance mechanism remain effective, we engaged key stakeholders in the design, review and improvement of our No Exploitation Protocol. This involved also partnered with labour rights and land rights specialist organisations like Dignity In Work For ALL (formerly Verité its continued effectiveness. Southeast Asia), Landesa and Earthworm Foundation in developing the protocol.

As part of our commitment to transparency, we publicly disclose a complete list of grievances and provide regular updates on the actions taken to address them. All investigations and findings multi-stakeholder consultations with local and international non- from valid cases are published on our Sustainability Dashboard, governmental organisations (NGOs) and human rights experts. which is updated on an ongoing basis. Furthermore, we conduct Through the Consortium of Resource Experts (CORE), Wilmar regular reviews of case studies to identify lessons learned, using this knowledge to refine our grievance mechanism and ensure

We aim to achieve a 100% response rate for all grievances raised and resolve open cases in a timely and transparent manner. In 2024, our response rate was 100%.



A harvester in Wilmar's plantation in Indonesia.



# IMPLEMENTATION OF "NO DEFORESTATION" AND "NO PEAT"

## NDPE Implementation Reporting Framework (NDPE IRF)

The 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.

## **Reporting on Progress Using the NDPE IRF**

The NDPE IRF outlines clear steps for implementation, enabling companies to monitor progress from policy development and initial engagement to on-the-ground actions. By tracking these activities, the framework highlights both achievements and areas requiring improvement.

Wilmar has set a goal of classifying 100% of our palm oil volumes as "Delivering" by 2025, in line with industry efforts to eliminate greenhouse gas emissions from land-use changes and deforestation. This objective aligns with global sustainability targets, including the Agriculture Sector Roadmap to 1.5-degree Celsius at COP27.

In 2024, Wilmar focused on enhancing data collection for 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.

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.

As of December 2024, 95.9%\* across our global supply chain were from suppliers that are delivering on No Deforestation requirements.

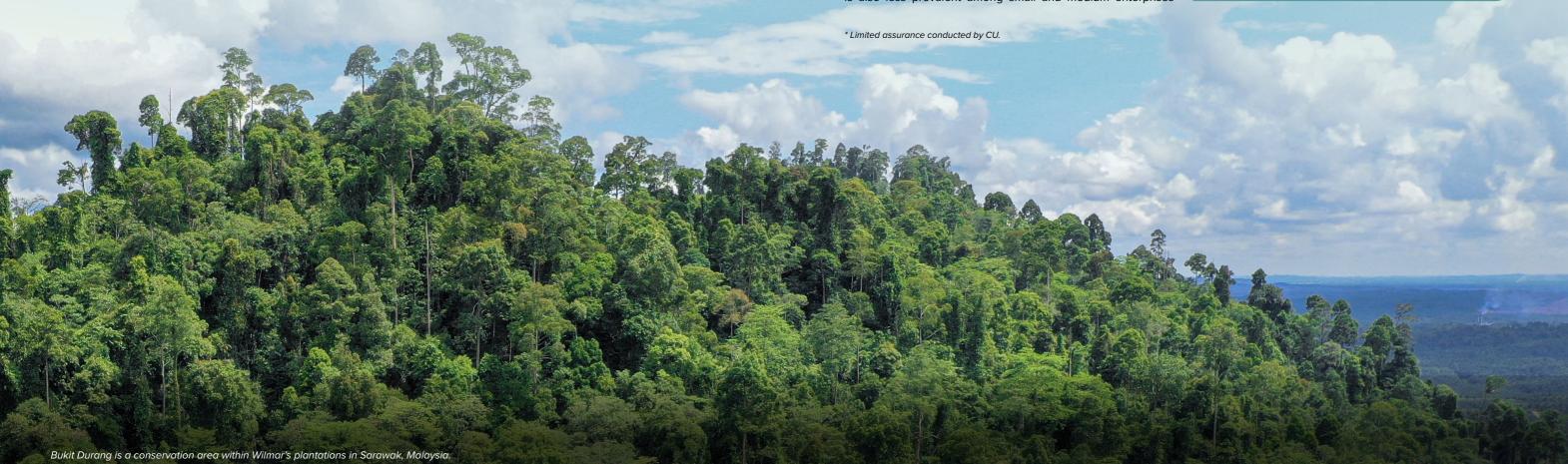
Despite notable progress made through improved data collection processes, shifting volumes out of the "Unknown" category remains a challenge. Many suppliers are still reluctant to provide detailed traceability information. NDPE IRF reporting is also less prevalent among small and medium enterprises

(SMEs) compared to larger companies. SMEs, in particular, face significant hurdles in NDPE IRF reporting mainly due to limited resources and a reluctance to disclose detailed information. 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's NDPE IRF profiles have been independently verified by CU 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.



For more information, please see Wilmar's NDPE IRF Action Plan 2024-2025.



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## Progress of deforestation-free by volumes\* based on NDPE IRF reporting categories

## No deforestation progress at production level (%)^

Origin Refineries<sup>7</sup> 2024\* 99.9 87.8 Delivering 914 45.4 81.5 4.8 0.0 4.3 1.2 0.3 5.7 4.6 **Progressing** Commitments and starting actions 45.2 0.7 3.2 0.0 3.8 35.0 0.0 **Awareness** 0.0 0.0 0.7 0.0 0.4 Known 0.1 0.4 7.5 6.8 5.8 9.7 Unknown 0.0 0.0 0.0 4.4 3.7 4.5

## No peat progress at production level (%)^

at production level (70)						
	Origin Refineries <sup>7</sup>		Destination Refineries <sup>8</sup>			
	2024*	2023	2022	2024*	2023	2022
Delivering	99.9	91.5	45.4	87.7	81.0	45.8
Progressing	0.0	4.3	0.5	0.3	5.7	0.5
Commitments and starting actions	0.0	3.8	45.9	0.6	3.4	39.4
Awareness	0.0	0.0	0.7	0.0	0.0	0.3
Known	0.1	0.4	7.5	7.0	6.2	9.5
Unknown	0.0	0.0	0.0	4.4	3.7	4.5

#### Overall Progress<sup>9</sup>

Overall Progress						
, and the second	No deforestation progress at production level (%)			No peat progress at production level (%)		
	2024*	2023	2022	2024*	2023	2022
Delivering	95.9	88.4	45.5	95.9	88.2	45.5
Progressing	0.1	4.7	2.2	0.1	4.7	0.5
Commitments and starting actions	0.2	3.6	42.1	0.2	3.6	43.9
Awareness	0.0	0.0	0.6	0.0	0.0	0.6
Known	2.3	2.1	2.1	2.3	2.2	8.1
Unknown	1.5	1.2	1.2	1.5	1.1	1.3

- 7 Origin Refineries refer to refineries and kernel crushing plants that are in palm oil producing countries, such as Malaysia and Indonesia.
- 8 Destination Refineries refer to refineries that import crude or refined palm/lauric oil from other regions to meet local demand for palm products. Examples of destination refineries include those in China, Europe, the United States, etc.
- 9 Consolidated data of Origin and Destination.
- Limited assurance conducted by CU.
- Where TtP information was unavailable, a village-level approach with a 50-kilometre radius approach was employed for satellite monitoring.

## Improving Understanding and Protection of HCV-HCS Areas

HCV and HCS areas are rich in biodiversity, support vital ecosystem services and play a role in carbon sequestration. Adopting a responsible approach to identifying and protecting HCV-HCS areas is critical to sustainable palm oil.

## **Providing Technical Guidance to Suppliers**

Wilmar prioritises biodiversity conservation across our operations and supply chain by offering technical guidance to suppliers to integrate conservation principles into their practices.

To facilitate effective conservation efforts, Wilmar has developed and published a series of Best Management Practices (BMPs) Guidelines. These guidelines support the implementation of conservation actions on the ground and provide guidance for monitoring HCV and HCS areas. Resources such as the BMPs Manual for Growers on Forest Conservation and Community Collaboration are available in multiple languages, including English and Bahasa Indonesia, to ensure accessibility for diverse stakeholders. In addition, a Practical Guidance on Conservation Areas Monitoring is available in both Bahasa Indonesia and Bahasa Melayu, with an English version published in 2024 to support suppliers, including those in West Africa.

## **Training Initiatives to Strengthen Conservation Practices**

Between 2021 and 2023, Wilmar collaborated with Proforest to deliver four BMPs training workshops for third-party suppliers in Malaysia. These workshops covered crucial topics such as riparian management, biodiversity monitoring and HCV-HCS identification and management. Through interactive sessions, case studies and practical field exercises, over 250 participants

gained valuable knowledge and skills to implement effective conservation practices. Conservation topics focusing on riparian management and conservation monitoring were incorporated into supplier trainings on SRT and NDPE to further strengthen the integration of biodiversity conservation in our supply chain.

Our commitment to managing HCV and HCS areas extends beyond our supply chain through partnerships with external organisations and multi-stakeholder initiatives. For example, through the South East Asia Rainforest Research Partnership (SEARRP), Wilmar supported research-led programmes that promote BMPs within plantation landscapes. These initiatives help bridge the gap between scientific research and practical application, fostering sustainable management within the

Wilmar is also actively involved in several Roundtable on Sustainable Palm Oil (RSPO) working groups, such as the RSPO Biodiversity and High Conservation Values Working Group, RSPO Remediation and Compensation Procedure, Compensation Task Force 2 and the Compensation Panel. Through these platforms, Wilmar provides strategic and technical support to the implementation of RSPO's HCV approach and the review of remediation and compensation plans.



For more information on our HCV-HCS initiatives. please refer to the **Biodiversity and Conservation** section of our Sustainability Report 2024.

## **Minimising Risk of Fires in Plantations**

Fires and haze are complex issues involving many factors beyond a company's direct control such as traditional agricultural practices, peatland management, weather patterns and natural causes. Proper management requires multifaceted mitigating efforts including increasing public awareness of responsible land management, strengthening law enforcement against unauthorised burning, addressing challenges in remote or inaccessible areas through early detection and specialised firefighting teams and adapting to prolonged dry seasons exacerbated by climate change.

Wilmar has a No Burning policy for land preparation or development. To mitigate fire risks, we employ satellite imagery to detect fire hotspots across our plantation operations. These systems provide 24/7 continuous surveillance, up to five kilometres beyond concession boundaries. We further strengthen our efforts with on-the-ground monitoring, enabling the early identification and suppression of fires before they escalate. Our daily monitoring process utilises the Visible Infrared Imaging Radiometer Suite and NASA satellite imagery

to identify hotspot alerts. Once fires are confirmed, Wilmar dispatches on-site response teams stationed at all concessions.

To further support fire prevention and control in Indonesia and Southeast Asia, Wilmar has been a voluntary member of the Fire Free Alliance (FFA) since 2016. This multi-stakeholder initiative aims to prevent, detect, suppress and report fires, with a focus on engaging local communities and raising awareness. The Fire Free Community initiative empowers local communities through education on sustainable agricultural practices. Since joining the FFA, Wilmar has carried out fire-free socialisation programmes in 147 villages, including 77 located around existing management concessions in 2024.



For more information on our fire prevention and management initiatives, please refer to the **Biodiversity and Conservation** section of our Sustainability Report 2024.

## Landscape and Jurisdictional Approaches

## **Facilitating Landscape Approaches**

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 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.

We believe that this approach is integral to Wilmar's ongoing efforts to facilitate sector-wide change and transformation. As such, we support and contribute to collaborative groups, including but not limited to:

• Palm Oil Collaboration Group (POCG) including Production and Protection Beyond Concessions (PPBC) Working Group

- Sabah Jurisdictional Certification Steering Committee
- Private Sector Coalition for Green Siak

We also promote sustainable community-based forest management in Telaga Village Forest in Kalimantan, Indonesia, in collaboration with the Community Forest Ecosystem

In Malaysia, Wilmar supports the Sekar Imej Conservation Area Project in the Sugut region of Sabah, focusing on conserving forest landscapes while fostering sustainable practices.

In 2024, we continued to support various landscape-level initiatives in Indonesia, namely the Siak-Palalawan Landscape Programme in Riau Province, Sumatra, particularly focusing on sustainable palm oil production, environmental conservation and community development. We also support the Jurisdictional Certification initiative by the Seruyan Regency of Central Kalimantan by actively engaging with the local government on its implementation to align local government policies with sustainability goals. These initiatives are part of Wilmar's commitment to addressing deforestation, biodiversity loss, and social issues linked to palm oil cultivation.

## **Approaches**



Wilmar collaborates with our customers, industry peers, government agencies, NGOs and other stakeholders to promote sustainable practices at a landscape level. This involves working across large areas that encompass multiple land uses such as agriculture, forests and community lands.

We collaborate with independent organisations such as Proforest and Daemeter to monitor implementation.



We work with local communities to improve livelihoods through programmes that promote sustainable agriculture, provide education and support smallholder farmers.



Our initiatives include supporting smallholders to achieve mandatory Indonesian Sustainable Palm Oil (ISPO) certification, ensuring compliance with government regulations.



We support independent smallholders in mapping their plots and monitoring supply chains to ensure transparency and traceability.

These landscape-level initiatives demonstrate our commitment to sustainable palm oil production, environmental protection as well as balancing economic development with ecological conservation and social equity.

## **Facilitating Landscape Approaches**

In 2015, Sabah became the first region globally to initiate a jurisdictional certification approach for sustainable palm oil. Sabah is a key player in the global palm oil market, accounting for 10.0% of the world's annual trade. While the industry supports the livelihoods of countless smallholders, it also presents complex environmental and social challenges.<sup>10</sup>

The Sabah Jurisdictional Approach for Sustainable Palm Oil Initiative represents a state-level commitment to achieving 100% RSPO certification for oil palm across Sabah. Its goal is to transform the palm oil production and supply chain by halting deforestation, restoring ecosystems and securing livelihoods.

Recognising the significance of the palm oil industry in Sabah. Wilmar actively contributes to the Sabah Jurisdictional Approach as a key collaborator and stakeholder. Being part of the Sabah Jurisdictional Certification Steering Committee, we support Sabah in its overall strategy and approach towards priority actions such as:

- Achieve no loss of HCV and HCS forests
- Enable zero-conflict in production landscapes
- Strengthen smallholder sustainability
- Uplift livelihoods

As an industry leader, we are in a unique position to contribute our expertise and knowledge of the palm oil sector, sustainability practices and supply chain management to support informed decision-making at the state level. We also collaborate with government agencies, industry peers and civil society organisations to advance the jurisdictional approach.



Read more about the Sabah Jurisdictional Approach

10 https://rspo.org/wp-content/uploads/Sustainable-Palm-Oil-Europes-Business-Report\_SEP2022.pdf

## Agriculture Sector Roadmap to 1.5-degree Celsius

line with a 1.5-degree Celsius pathway.

Since the introduction of the Agriculture Sector Roadmap to a 1.5-degree Celsius pathway. **1.5-degree Celsius** at COP27 in 2022, Wilmar has continued to work both individually and collaboratively to advance Further details on progress and future actions are available its goals. We partner with key stakeholders, including the in our Palm Oil Sectoral Roadmap Commitment Index POCG, to drive sector-wide efforts that align supply chains which outlines our progress to date and steps we will take with the roadmap's objectives.

In the same year, Wilmar joined the Science Based Target **here**. initiative (SBTi), committing to set both near-term and net-

At the 26th United Nations Climate Change Conference of zero targets. We have since updated our FY2022 base year the Parties (COP26) in Glasgow, Wilmar, along with 13 other emissions to better align with the categorisation from SBTi major agricultural commodity companies, committed to and have split out our emissions (including land use change) delivering a shared roadmap for accelerated action within related to Forest, Land and Agriculture (FLAG) across all the supply chain to halt commodity-linked deforestation in Scope 1, 2 and 3. Our submitted targets, including Scope 3 targets for FLAG and Energy/Industry) were validated by SBTi in early 2025, further affirming our approach towards

latest progress update from all signatories can be accessed

## **Production and Protection Beyond Concessions**<sup>11</sup>

by Proforest, a global non-profit organisation.

companies to work with other stakeholders including local particularly in Indonesia and Malaysia. governments, communities and civil society organisations

Wilmar plays an active role in the PPBC Action Group, a to plan and implement longer-term forest and livelihood coalition of 12 companies and technical groups coordinated positive actions that proactively, holistically and inclusively address deforestation outside their concessions.

Various monitoring systems today issue regular The PPBC Action Group was formed to scale up action deforestation alerts. While alerts within known supply chains for responsible production and forest protection beyond allow companies to engage directly with suppliers, those concessions through proactive interventions, action occurring outside company concessions pose significant protocols and targeted monitoring. Key activities include challenges. These encompass issues such as illegal identifying priority locations through geospatial analysis, encroachment, community or smallholder land ownership engaging stakeholders and aligning with relevant initiatives. conflicts and the lack of direct commercial leverage. The goal is to collectively agree on and implement robust with these smallholders. Therefore, there is a need for monitoring and action protocols for critical oil palm areas,

## Supporting Palm Oil Smallholders in Indonesia Towards Sustainability

practices like slash-and-burn farming or deforestation.

in adopting sustainable practices and aligning with our NDPE deforestation data from remote sensing. commitments, especially those related to no deforestation and no conversion. Our smallholder certification roadmap In 2024, Wilmar supported 902 independent smallholders outlines initiatives to improve livelihoods through training in Jambi Province in obtaining RSPO certification. As of on deforestation-free practices, traceability, organisational December 2024, Wilmar has supported 3,700 smallholders management and obtaining ISPO certification. We also supplying our mills in obtaining ISPO certification. help smallholders access financial assistance through government programmes and the Indonesian Oil Palm Plantation Fund Management Agency.

Smallholders are a vital part of the palm oil sector but often To further strengthen supply chain sustainability and lack adequate support and face barriers such as limited traceability, Wilmar collaborates with NGOs and industry access to quality seeds, fertilisers, training and markets, peers in high-priority areas. In 2019, we introduced a particularly when they are involved in unsustainable traceability tracking tool (WT3) to assist smallholders, mills and cooperatives in monitoring and measuring the deforestation-free status of their FFB supply. WT3 can be Since 2017, Wilmar has implemented programmes to support integrated with Wilmar's geographic information system to independent smallholders in Riau, Jambi and North Sumatra grant users access to the combination of geolocation and

## Malaysian Sustainable Palm Oil

The Malaysian Sustainable Palm Oil (MSPO) is a national has actively contributed to the revision of the MSPO legal framework for sustainable palm oil production. peers and relevant agencies. Designed to promote environmentally responsible, socially beneficial and economically viable practices, the MSPO The updated MSPO Standards were launched in 2022, Malaysia, including smallholders.

certification scheme which forms the basis of mandatory Standards as part of a working group alongside industry

certification is mandatory for all palm oil operators in reflecting enhanced industry knowledge and a stronger practices. The MSPO, formally the Malaysian Palm Oil Working groups provide input and recommendations to the Certification Council, and owner of the MSPO scheme, MSPO Standards to ensure the relevance and effectiveness has stipulated a transition period from 1 August 2023 to 31 of the scheme in meeting sustainability objectives. Wilmar December 2024 for organisations to ensure compliance.

# **IMPLEMENTATION OF "NO EXPLOITATION"**

## **No Exploitation Protocol**

Wilmar's No Exploitation Protocol was created to uphold the "No Exploitation of People and Local Communities" principle outlined in our NDPE Policy, safeguarding the most vulnerable groups within our supply chain. This protocol introduces additional measures and oversight mechanisms to address noncompliance beyond those covered by our Grievance Procedure. It also establishes a framework for suppliers to implement corrective actions, undertake remediation, drive systemic change and report their progress. Key principles addressed by the protocol include:

Tackling exploitation is inherently complex and requires tailored actions and heightened vigilance to avoid adversely impacting the rights of those involved. To strengthen the safeguards offered by our policies, Wilmar collaborated with CORE to form a specialised technical working group with input from Dignity In Work For ALL (formerly Verité Southeast Asia), Landesa and the Earthworm Foundation. Two rounds of consultations with a broad range of stakeholders, including local and international NGOs and human rights experts, played a vital role in shaping the protocol.



PROTECTING WORKERS' RIGHTS



UPHOLDING THE RIGHTS OF HUMAN RIGHTS DEFENDERS

Wilmar is committed to exhausting every possible alternative before considering supplier suspension, recognising the potential consequences for affected workers and communities to access remedies and reparation. Our approach aligns with global principles of responsible disengagement, including the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights (UNGPs).



RESPECTING INDIGENOUS PEOPLES, COMMUNITY RIGHTS AND LAND RIGHTS



## **Our Human Rights Due Diligence Approach**

The agriculture sector, including the palm oil industry, has the potential to improve human rights by prioritising better working conditions, fair wages and stronger labour protections for workers. By ensuring safe environments and safeguarding the rights of all workers, including migrant workers, the sector can create more equitable opportunities while upholding child protection. In addition, promoting secure land rights for smallholders and adopting sustainable farming practices can positively impact local communities and indigenous populations.

At Wilmar, we adopt a comprehensive HRDD approach to ensure we proactively address any risk that could contribute to human rights abuses, preventing harm before it occurs. Our HRDD

process provides a structured approach for respecting human rights and aligning with Wilmar's Human Rights Framework and related policies. We focus on eight critical areas relating to human rights within our business:

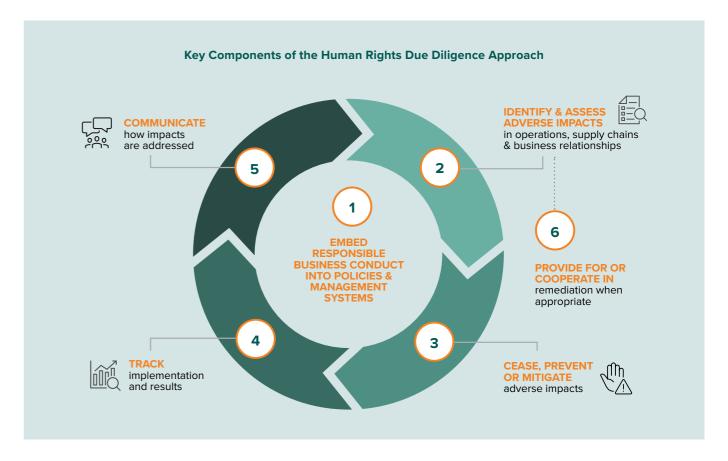
- Women's rights
- Child protection
- No forced or bonded labour
- Supporting smallholders
- Community development, land and indigenous rights
- Occupational health and safety
- Freedom of association
- · Non-discrimination and equal opportunities

Our HRDD approach is aligned with the UNGPs on Business and Human Rights, and includes the following elements:

- · Policy commitment
- Assessment of actual and potential human rights impacts
- · Integration of findings
- Tracking performance

- Communication about how we address impacts
- Implementing processes for remediation, when appropriate

The diagram<sup>12</sup> below outlines the key components of our HRDD framework, which include but are not limited to the following activities:



28 Wilmar International Limited

HRDD is a continuous process that requires regular reviews of our strategies and programmes which we conduct diligently. In the implementation of the HRDD process, we regularly engage external stakeholders to gain insights into ground-level issues and identify effective mitigation measures. A notable example is the development of our No Exploitation Protocol, which was shaped in collaboration with local and international stakeholders such as NGOs, trade unions and workers unions. This protocol offers clear guidance for addressing, mitigating and resolving grievances related to human rights.

In addition, we leverage tools such as our SRT and Grievance Procedure to monitor suppliers' progress, ensure adherence to our NDPE Policy and identify any concerns involving Wilmar or third-party suppliers that require timely action.

Raising awareness and capacity building are key pillars of our HRDD approach. Insights from stakeholder engagements and SRT assessments have highlighted ethical recruitment as a critical area of focus for suppliers in Malaysia. To address this, we organised training workshops aimed at tackling challenges related to forced labour and ethical recruitment while creating a platform for participants to engage with experts and address concerns. These sessions explored key topics, including updates to the Employment Act and detailed interpretations of its provisions.

## **Living Wage**

Wilmar is committed to ensuring that all employees and contractors within our palm operations are paid a living wage, based on available living wage frameworks in the countries where we operate by following the RSPO Living Wage Benchmark. In regions or countries where living wage standards are not established, we prioritise ensuring that employees and contractors are paid at least the statutory minimum wage.

In 2024, we assessed 100% of our employees and contractors to ensure they are paid a living wage.

Using our SRT, we also assess our suppliers on key elements of living wage, including the provision of:

- Food
- Water
- Accommodation
- Healthcare
- Transportation
- EducationDaycare

## **Partnerships and Platforms**

To drive our No Exploitation commitment forward, Wilmar actively engages in multi-stakeholder initiatives and partnerships that promote human rights protection.

## **Social Issues Working Group**

Going beyond financial contributions, Wilmar also participates and contributes to the POCG, including its **Social Issues Working Group**. The working group is a collective of 32 companies collaborating on issues such as responsible recruitment in Malaysia, HRDD systems and protecting the rights of indigenous peoples and local communities. The aim is to address human rights issues within the sector.

## **RSPO Living Wage Task Force**

Wilmar stepped down from its role as co-chair of the RSPO Living Wage Task Force in 2023 but remains an active and committed member. We continue to collaborate with stakeholders to refine and implement living wage benchmarks across RSPO-certified regions. These benchmarks align with the RSPO Guidance for Implementing a Living Wage, a framework published in 2020 with input from Wilmar. The task force submitted key recommendations for the RSPO P&C standards review in 2023.

## **Smallholders**

In Indonesia, the world's largest palm oil producer, independent smallholders are projected to manage 60.0% of the nation's plantation area by 2030.<sup>13</sup> This speaks to the importance of smallholders and the critical need to include them in sustainable palm oil production and supply chains.

In 2024, we received 130,352 MT of FFB from more than 27,500 scheme smallholders and 246,148 MT of FFB from over 11,600 independent smallholders, representing 1.7% and 3.1% of our overall supply respectively.

## **Smallholder Programmes**

To support the inclusion of smallholders in sustainable supply chains, we collaborate with external partners to design programmes that enhance agricultural practices in line with international standards.

Wilmar is dedicated to ensuring that 100% of our scheme and independent smallholders who are covered by our programmes benefit from access to expertise and best practices that can help them achieve NDPE compliance.

Our scheme smallholder programmes are designed to equip farmers with training and resources to adopt sustainable farming techniques and practices, enhance FFB yields and attain certifications such as RSPO and applicable national standards. For independent smallholders, we develop location-specific initiatives tailored to the unique challenges faced in their respective regions. While certification is not the primary objective of our programmes, we also help interested independent smallholders work towards achieving it.



For more information on our smallholder programmes, please refer to the section on **Economic and Community Contribution** of our Sustainability Report 2024.

## **APPENDIX**

## **External Assurance from Control Union Certifications**

#### **Independent Assurance Statement**

Control Union Certifications was commissioned by Wilmar to conduct an independent assurance of the following disclosures: Traceability to Mill (TtM), Traceability to Plantation (TtP), NDPE Implementation Reporting Framework (NDPE IRF), Satellite Monitoring, Supplier Engagement, Certifications and Biodiversity and Conservation of Peat. The scope of this assurance covers palm oil and lauric.

The information provided for verification in both the Sustainability Report 2024 and the Palm NDPE Implementation Annual Report 2024 is the exclusive responsibility of Wilmar. Control Union Certifications was not involved in the preparation of any materials included in this Report.

The responsibility of Control Union Certifications is to express an opinion concerning the statements included in the Report regarding TtM, TtP, NDPE IRF, Satellite Monitoring, Supplier Engagement, Certifications and Biodiversity and Conservation of Peat disclosures, within the assurance scope mentioned below, with the purpose to inform all the interested parties.

### **Assurance Scope**

The assurance engagement has been planned and performed in accordance with AA1000AS v3. The assurance process involves verification of the following aspects:

#### Inclusivity

Engagement with stakeholders in the Report development process and their involvement in organisational decision makina

Wilmar employs various ways of engaging their stakeholders depending on stakeholder category and stakeholder location. The ways in which the different categories of stakeholders are engaged includes regular meetings, memberships and partnerships with associations, whistleblowing mechanisms and grievance processes.

#### Materiality

Identification of issues in the Report that are relevant and significant to the organisation's stakeholders, the presence of and the extent to which these material issues are disclosed in the Report

The disclosures stated in this Report are a prerequisite to implement sustainability programmes within the supply chain. Thus, within the scope of this review they have been identified as relevant material topics. As a result, Wilmar has a policy in place that addresses traceability; NDPE compliance such as satellite monitoring and supplier engagements; grievance

mechanism processes; and obtaining relevant sector-related certifications.

#### Responsiveness

Acting on stakeholder issues and provision of feedback through decisions, actions, performance and communication

Wilmar runs an annual supplier programme to assess suppliers' progress and their implementation of the No Deforestation, No Peat, No Exploitation (NDPE) Policy. Based on the outcome of this programme, action plans are generated to assist suppliers in resolving NDPE related issues at their mills and associated estates. In addition, Wilmar also has grievance processes and whistleblowing mechanisms through which stakeholders can provide feedback.

#### Impact

Monitoring, measuring and providing accountability for how the actions of the organisation affect the economy, environment, society, stakeholders or the organisation itself

For 2024, Wilmar's progress against their commitments and targets are categorised below according to the disclosures within the scope of this assurance statement.

## Table 1: TtM and TtP

98.5% which translates to approximately 26.0 million MT of palm and lauric products is traceable to mill level

91.0% which translates to approximately 24.0 million MT of palm and lauric products is traceable to plantation level

#### Table 2: NDPE IRF

NDPE IRF profiles are published for 72 facilities globally

99.9% of palm oil and lauric product volumes to Wilmar's Origin Refineries in Malaysia and Indonesia and 95.9% across Wilmar's global supply chain have achieved "Delivering" status for both No Deforestation and No Peat requirements using the NDPE IRF

#### **Table 3: Supplier Engagement**

917 (100%) suppliers assessed

906 (98.8%) suppliers assessed as low-priority mills

11 (1.2%) suppliers assessed as high-priority mills

11 (100%) high-priority mills engaged (e.g. field visit, action plan follow-up, meeting, email correspondence, etc)

#### **Table 4: Certifications**

For operations in Malaysia, Indonesia, Ghana and Nigeria:

- · 29 mills are RSPO-certified (82.9%)
- 252,487 ha of oil palm plantations are RSPO-certified (82.1%)

For operations in Indonesia:

- 25 mills are ISPO-certified (73.5%)
- 7 independent palm oil mills completed ISPO certification audits (63.6%)

For operations in Malaysia:

- 8 mills are MSPO-certified (100%)
- 20 oil palm plantations are MSPO-certified (100%)

#### Table 5: Satellite Monitoring

>23.1 million ha of land covered by satellite monitoring across Wilmar's global operations and supply base<sup>1</sup>

1.018 supplier groups and 7.921 plantation units monitored

## Table 6: Biodiversity and Conservation (Peat Area)

Total peat area and total planted on peat in Wilmar's concession areas in Malaysia and Indonesia were verified

	Sabah	Sarawak	West Kalimantan	Sumatra	TOTAL
Planted peat area (Ha)	10	84	14	1,593	1,701

Approximately 1,701 ha of the total planted area in Wilmar's oil palm plantations across Indonesia and Malaysia, is classified as peat.

#### **Level of Assurance**

The level of assurance is used to determine the depth of detail that an assurance provider uses to identify if there are material errors, omissions, or misstatements. The level of assurance for this Report is moderate.

### Methodology

- REVIEW of internal and external documentary evidence presented by Wilmar
- VERIFICATION of data presented in the Report including a detailed review of sample data
- INTERVIEWS of personnel within relevant divisions responsible for management of the programmes presented within the scope of this statement i.e. TtM, TtP, NDPE IRF, Satellite Monitoring, Supplier Engagement, Certifications and Biodiversity and Conservation of Peat

## **Independence and Quality Control**

Control Union Certifications is accredited according to ISO 17021-1:2015/ISO 17065:2012 covering our global scope and operations. This includes the need to maintain a comprehensive system of quality control including documented policies and procedures on compliance to ethical and legal requirements as well as objectivity throughout our operations. The auditors

performing the data check were selected appropriately based on our internal qualifications, training, and experience. It is also reviewed by management to ensure that the applied approach and assurance are strictly followed and operated transparently.

## Conclusions

Based on our moderate process, nothing has come to our attention that causes us to believe that the scope (subject matter) as detailed above and presented in the Report is not presented fairly in accordance with the criteria.

Hence, our work confirms that the information included in the Report is reliable and objective and is presented clearly and understandably.



Zulkarnain Ishak Manager Sustainability Assurance 24th April 2025



1 Indonesia, Malaysia, Papua New Guinea, Brazil, Cameroon, Colombia, Costa Rica, Democratic Republic of the Congo, India, Ghana, Guatemala, Honduras, Ivory Coast, Liberia, Mexico, Nicaragua, Nigeria, Sao Tome and Principe, Sierra Leone, Solomon Islands, Sri Lanka and Thailand.

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# Agriculture Sectoral Roadmap to 1.5-Degree Celsius: Palm Oil Sectoral Roadmap Commitment Index

AGRI SECTOR PILLARS	PALM OIL SECTOR IMPLEMENTATION	2024 UPDATES	SOURCES
PILLAR 1 Accelerate supply chain action to reduce emissions from land use change	All palm oil volumes are in the "Delivering" category of the NDPE IRF by 2025	Refer to our NDPE IRF profile here	PALM NDPE IMPLEMENTATION ANNUAL REPORT 2024:  • NDPE IRF, pages 18 to 20 • Reporting on Progress using the NDPE IRF, pages 18 to 20
PILLAR 2 Drive transformation of commodity producing landscapes	Companies will aim to scale up forest positive action for production and forest protection in priority landscapes through proactive interventions, action protocols and targeted monitoring, with a particular focus on independent smallholders in palm oil supply chains	Wilmar actively participates in partnerships and collaborations to promote transformation at the landscape level, including but not limited to, the PPBC Working Group, government-led jurisdictional approach, and RSPO and MSPO working groups      Wilmar has also partnered with L'Oreal and Nestlé to support smallholders in Sumatra, Indonesia to achieve ISPO certification	PALM NDPE IMPLEMENTATION ANNUAL REPORT 2024:  • Landscape and Jurisdictional Approaches, pages 22 to 25  SUSTAINABILITY REPORT 2024:  • Partnerships and Multistakeholder Initiatives, page 16

AGRI SECTOR PILLARS	PALM OIL SECTOR IMPLEMENTATION	2024 UPDATES	SOURCES
PILLAR 3 Support forest positive sector transformation	Engage with industry peers and other supply chain actors to mainstream ISPO and MSPO to ensure that supply chain targets are met by the entire sector  Engage with key governments to strengthen the enabling environment for forest positive production by accelerating the uptake and recognition of ISPO and MSPO	<ul> <li>We work with partner organisations to develop programmes aimed at facilitating the inclusion of smallholders into sustainable supply chains and ultimately achieve certification under applicable national and voluntary certification schemes (ISPO, MSPO and RSPO)</li> <li>Wilmar has been an active member of the NDPE IRF initiative, supporting discussions to help align thinking on key issues and identifying areas for collaborative action</li> <li>We work with SEARPP and are an active member of ISPO and RSPO task forces, working groups and/or focus groups</li> </ul>	SUSTAINABILITY REPORT 2024:  Partnerships and Multistakeholder Initiatives, page 16  Supporting Smallholders, page 117  Biodiversity and Conservation, pages 24 to 29  PALM NDPE IMPLEMENTATION ANNUAL REPORT 2024:  NDPE IRF, pages 18 to 20  Smallholder Programmes, page 29  Improving Understanding and Protection of HCV-HCS Areas, page 21

