**Updated: 4 July 2018**

<table>
<thead>
<tr>
<th>Ref. No.</th>
<th>Date Received</th>
<th>Subject Matter</th>
<th>Stakeholder(s)</th>
<th>Progress</th>
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<tr>
<td>N44</td>
<td>30 May 2018</td>
<td>Alleged deforestation by PT Surya Panen Subur II (SPS II). Report can be found here</td>
<td>Rainforest Action Network (RAN)</td>
<td>Wilmar has initiated engagement with PT Surya Panen Subur II (SPS II) when RAN released the report titled <em>The Last Place on Earth</em> in November 2014 (For more information on Wilmar’s effort in protecting the Leuser landscape, please refer to case N06). PT SPS II has been transparent in updating us regularly on their progress in addressing issues raised by RAN. Further, PT SPS II has implemented best management practices on peatland since 2014 and have committed to a moratorium in 2015. Our own internal monitoring over the last years has identified that there are pockets of land clearing in the areas, which is consistent with the pattern of community encroachment. The company themselves have continued to maintain a moratorium on the area. PT SPS II are working closely with one of their major palm oil buyer, Golden Agri Resources (GAR) and The Forest Trust (TFT) in seeking resolution to the conflict. GAR has launched a CFT programme (Collaboration For Transformation) for PT SPS II in 2017, which focuses on conflict resolution to address land tenure issues between PT SPS II and local communities. To deal with the illegal encroachment, PT SPS II has reported the following actions: i. Engagement with surroundings communities ii. Reached out to Government Land Authority requesting for enforcement of PT SPS II’s land use right iii. Conducted land Tenure Study/Participatory mapping iv. Filed police reports on the ongoing illegal encroachment v. Transparently reported the encroachment/illegal occupation issues to the Governor of Aceh With reference to the allegation of using fire on land clearing, the high court has delivered their verdict that, PT SPS II was found not guilty. <a href="http://putusan.mahkamahagung.go.id/putusan/4d2f311f3004e6f5e70a1aff2c47fd98">http://putusan.mahkamahagung.go.id/putusan/4d2f311f3004e6f5e70a1aff2c47fd98</a></td>
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<tr>
<th></th>
<th>13 December 2017</th>
<th>Alleged deforestation by PT Hardaya Inti Plantation (HIP), a subsidiary of Hardaya Plantations Group (HPG).</th>
<th>Greenpeace</th>
<th>In December 2017, Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT Hardaya Inti Plantation (PT HIP), a subsidiary of Hardaya Plantations Group (HPG) was identified to be involved in deforestation. Wilmart had already initiated engagement HPG in September 2017 on the allegations of non-compliance to our NDPE Policy following findings from our internal proactive monitoring. HPG has committed to a moratorium on land clearing, and currently exploring options for various assessment. They are also seeking consultation from AidEnviroment to establish their capacity to comply with NDPE requirements. Their first meeting with AidEnviroment was held in December 2017, and follow up with several regular meetings thereafter, in February and May 2018. Wilmar continues to monitor HPG’s activities on a monthly basis to ensure HPG will uphold their commitment to the moratorium.</th>
</tr>
</thead>
<tbody>
<tr>
<td>N43</td>
<td>13 December 2017</td>
<td>Alleged deforestation by PT Sumber Alam Selaras (SAS), a subsidiary of NPC Resources</td>
<td>Greenpeace</td>
<td>Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT Sumber Alam Selaras (SAS), a subsidiary of NPC Resources was identified to be involved in deforestation. Prior to receiving the report from Greenpeace in December 2017, Wilmar had already initiated engagement with NPC on the allegations of non-compliance to our NDPE Policy following our own internal proactive monitoring. NPC has appointed Aksenta to conduct the relevant assessments at PT Sumber Alam Selaras (SAS) relating to NDPE compliance. Wilmar’s team met with NPC in February 2018 to discuss the scope of Aksenta’s assessment in PT SAS to make sure it covered all components of the NDPE Policy. Aksen completed the assessment in April 2018 and is in the process of preparing the report.</td>
</tr>
</tbody>
</table>
| N41 | 13 December 2017 | Alleged deforestation by PT Prima Bahagia Permai (PBP), a subsidiary of IJM Plantation | Greenpeace | Wilmar continues to monitor PT SAS’s activities on a monthly basis to ensure PT SAS will uphold their commitment to the moratorium. 

Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT Prima Bahagia Permai (PBP), a subsidiary of IJM Plantation was identified to be involved in deforestation. 

Wilmar immediately reached out to IJM in December 2017 when the allegations of non-compliance with Wilmar’s NDPE Policy were brought to our attention. 

First meeting with IJM was conducted on 7 Feb 2018 to discuss the details on NDPE policy compliance, including a HCSA assessment. We understand from IJM that HCV assessment was completed in 2014 and Carbon Stock study at PT Prima Bahagia Permai (PBP) was completed in 2016, both by PT Sonokeling. IJM has shared a copy of the reports with Wilmar for review. IJM immediately committed to a moratorium and Wilmar has also offered support on the HCSA assessment. 

A second meeting with IJM took place on 17 May 2018 to discuss the workplan for HCSA assessment. Terms of reference for the required assessment is being prepared jointly by Wilmar and IJM. 

Wilmar continues to monitor PT PBP’s activities on a monthly basis to ensure PT PBP will uphold their commitment to the moratorium. |

| N40 | 13 December 2017 | Alleged deforestation by PT Lahan Agro Inti Ketapang (PT LAIK), a subsidiary of DTK Opportunity | Greenpeace | Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT Lahan Agro Inti Ketapang (PT LAIK), a subsidiary of DTK Opportunity identified to be involved in deforestation. 

Wilmar identified PT LAIK as a supplier with potential non-compliance to our NDPE Policy in early 2017 through our internal monitoring. Based on our own proactive monitoring, we are aware that PT LAIK has ceased its land clearing activities and are proceeding with relevant assessments, i.e. Soil analysis. 

Soil analysis was completed in June 2017 while HCV assessment was completed two years ago in February 2016. PT LAIK is aware that HCS analysis is needed before they can resume... |
any land clearing activities. PT LAIK is currently seeking consultants to help with their capacity to comply with NDPE requirements.

Wilmar continues to monitor PT LAIK’s activities on a monthly basis to ensure PT LAIK will uphold their commitment to the moratorium.

| N39 | 13 December 2017 | Alleged deforestation by PT Gemilang Sawit Kencana, a subsidiary of Hartono Plantation Indonesia (HPI Agro) | Greenpeace | In December 2017, Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT Gemilang Sawit Kencana (GSK) a subsidiary of Hartono Plantation Indonesia (HPI Agro) was identified to be involved in deforestation.

Wilmar initiated engagement with HPI Agro in December 2017 when the allegations of non-compliance with Wilmar’s NDPE Policy were raised by Greenpeace in December 2017. The supplier responded that they are operating within legal framework and they will commit to Wilmar’s NDPE Policy requirements.

A meeting was held with the supplier in March 2018 to further discuss the details related to HCV and HCS assessments. Moratorium is currently in place while the supplier completes assessments.

Wilmar continues to monitor activities in PT GSK on a monthly basis to ensure PT GSK will uphold their commitment to the moratorium. |

| N38 | 13 December 2017 | Alleged deforestation by PT Agrindo Green Lestari and PT Citra Agro Abadi, subsidiaries of Ciliandry Anky Abadi (CAA) Group | Greenpeace | In December 2017, Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT Agrindo Green Lestari and PT Citra Agro Abadi, subsidiaries of Ciliandry Anky Abadi (CAA) Group were identified to be involved in deforestation. Prior to receiving the report from Greenpeace in 13 December 2017, Wilmar was made aware of CAA’s potential non-compliance to NDPE based on findings from our own internal proactive monitoring in mid-2017.

Engagement was immediately initiated with the supplier and the first meeting was held with CAA in July 2017, where we shared the requirements of our NDPE policy. CAA has also attended Wilmar’s three-day training workshop in Jakarta focussing on the implementation of Wilmar’s NDPE Policy in July 2017. |
Wilmar managed to secure commitment from CAA to adhere to NDPE policy and to halt further land clearing. However, our internal monitoring detected ongoing land clearing activities.

Wilmar’s last purchase from CAA was on March 2018.

| N37 | 13 December 2017 | The following Wilmar’s suppliers were allegedly link to companies with alleged deforestation named under “Ganda Group”: - PT Citra Riau Sarana - PT Ganda Sawit Utama - PT Inecda & PT Gandaerah Hendana - PT Patiware - PT Tritunggal Sentral Buana - PT Wawasan Kebun Nusantara | Greenpeace | In December 2017, Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT GAN, PT APM and PT ACP, which were allegedly owned or associated with ‘GAMA Group’ were identified to be involved in deforestation. [For more details, please refer to case N36]

The case report has also identified six Wilmar’s suppliers with links to the “GAMA Group” allegations. These suppliers are:
- PT Citra Riau Sarana
- PT Ganda Sawit Utama (PT Jatimjaya Perkasa, TH Indo Plantations)
- PT Inecda & PT Gandaerah Hendana
- PT Patiware
- PT Tritunggal Sentral Buana
- PT Wawasan Kebun Nusantara

Wilmar wrote to the above six suppliers individually requesting clarification of the allegations. All the suppliers have responded in writing in early June 2017 that they are not associated with PT GAN, PT APM and PT ACP. In the same letter, the suppliers have also committed to NDPE Policy, specifically on:
- Moratorium on all Land Clearing in our concession.
- No development on High Carbon Stock (HCS) forests.
- No development on High Conservation Value (HCV) areas.
- No new development on Peat areas, regardless of depth

While Wilmar is seeking more clarity on the GAMA’s ownership, we have ceased sourcing from the above six companies. [For more details, please refer to case N36] |

| N36 | 13 December 2017 | Alleged deforestation by the following companies, allegedly owned or | Greenpeace | In December 2017, Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT GAN, PT APM and PT ACP, which were allegedly owned or associated with ‘GAMA Group’ were identified |
associated with ‘GAMA Group’. 

i. PT Graha Agro Nusantara (GAN) 

ii. PT Agrinusa Persada Mulia (APM) 

iii. PT Agriprima Cipta Persada (ACP) 

to be involved in deforestation. There is no clarity as to whether ‘GAMA Group’ exists, however Wilmar has reached out to GAMA Corp as the main contact point in regard to this grievance.

Wilmar does not source from the 3 companies listed in the Greenpeace report, nor does it source from GAMA Corp. Nevertheless, we bridged a meeting between GAMA Corp and AidEnvironment in our Singapore office on 30 April 2018. At that meeting GAMA Corp agreed to continue the dialogue with AidEnvironment, and to establish their capacity to comply with NDPE requirements. A subsequent follow up meeting between AidEnvironment and GAMA took place on 15 May 2018 in Bogor.

Separately, GAMA Corp has also provided written confirmation to Wilmar, dated 8 June 2018, that GAMA Corp will commit to the full extent of the NDPE Policy, with specific emphasis on:

- Moratorium on all Land Clearing in our concession.
- No development on High Carbon Stock (HCS) forests.
- No development on High Conservation Value (HCV) areas.
- No new development on Peat areas, regardless of depth.

GAMA Corp also confirmed in their letter that they are exploring working with a third-party organization and is in the process of putting together their timebound action plan.

On 19 June 2018, Greenpeace shared with Wilmar a more comprehensive list of companies that are allegedly linked to GAMA Corp, Wilmar has decided to cease sourcing from all the suppliers that were on the list, while we continue our engagement with GAMA Corp. These suppliers are:

- PT Citra Riau Sarana
- PT Ganda Sawit Utama (PT Jatimjaya Perkasa, TH Indo Plantations)
- PT Inecda & PT Gandaerah Hendana
- PT Patiware
- PT Tritunggal Sentral Buana
- PT Wawasan Kebun Nusantara
- PT Karya Agung Megah Utama
- PT Perkebunan Anak Negeri Pasaman
- PT Serdang Hulu
- PT Swadaya Indopalma

| associated with ‘GAMA Group’ | to be involved in deforestation. There is no clarity as to whether ‘GAMA Group’ exists, however Wilmar has reached out to GAMA Corp as the main contact point in regard to this grievance. | i. PT Graha Agro Nusantara (GAN) | ii. PT Agrinusa Persada Mulia (APM) | iii. PT Agriprima Cipta Persada (ACP) | to be involved in deforestation. There is no clarity as to whether ‘GAMA Group’ exists, however Wilmar has reached out to GAMA Corp as the main contact point in regard to this grievance. | Wilmar does not source from the 3 companies listed in the Greenpeace report, nor does it source from GAMA Corp. Nevertheless, we bridged a meeting between GAMA Corp and AidEnvironment in our Singapore office on 30 April 2018. At that meeting GAMA Corp agreed to continue the dialogue with AidEnvironment, and to establish their capacity to comply with NDPE requirements. A subsequent follow up meeting between AidEnvironment and GAMA took place on 15 May 2018 in Bogor. | Separately, GAMA Corp has also provided written confirmation to Wilmar, dated 8 June 2018, that GAMA Corp will commit to the full extent of the NDPE Policy, with specific emphasis on:

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- PT Tritunggal Sentral Buana
- PT Wawasan Kebun Nusantara
- PT Karya Agung Megah Utama
- PT Perkebunan Anak Negeri Pasaman
- PT Serdang Hulu
- PT Swadaya Indopalma |
Wilmar takes very seriously Greenpeace’s allegations of complicity by Wilmar with Gama, where Wilmar’s CEO had personally responded to Greenpeace in a letter dated 20 June 2018. On 25 June 2018, Greenpeace released a report titled “Rogue Trader”, which has documented deforestation by companies, allegedly owned or associated with GAMA Corp. Greenpeace has subsequently sent a letter to Wilmar’s CEO on 26 June to raise their concern on Deforestation and Wilmar’s supply chain, where Wilmar’s CEO has responded with reiteration on Wilmar’s supply chain monitoring programme and our next steps. On 29 June 2018, The Forest Trust (TFT), Wilmar’s policy implementation partner has also released a statement on their position and response to the Greenpeace report.

A further meeting with GAMA was scheduled in July 2018, where we will follow up on GAMA Corp’s timebound action plan, as well as additional detail on the scope of the commitment by GAMA Corp. In the meantime, we will monitor their activities to ensure they will uphold their commitment to the moratorium.

| N35 | 17 November 2017 | Alleged deforestation, land conflict, licensing issues and sourcing of non-compliant palm by PT Kahayan Agro Plantation (PT KAP), a subsidiary of Anglo Eastern Plantations. | Mighty Earth | Prior to receiving the report titled “Mighty Earth Rapid Response Report 1” from Mighty Earth, Wilmar has already initiated engagement with Anglo Eastern Plantations (AEP) on the allegations of non-compliance to our NDPE Policy following our monitoring activity.

AEP has shared a letter of clarification and their HCV report on PT KAP with Wilmar for further review. The HCV assessment was conducted by Aksenta in 2011. AEP has also confirmed that they are not sourcing non-complaint palm from PT Guntur Madu Agrotama.

On 17 December 2017, Greenpeace shared with Wilmar information on 16 companies with alleged non-compliance to NDPE requirements. The case report provided some details of deforestation allegations, such as map outlines and names of concessions. PT KAP was also being identified to be involved in deforestation.

Wilmar’s team met with AEP in Medan on 15 December 2017 to discuss the reports and seek PT AEP’s commitment on a moratorium on land clearing while they are exploring options for various assessments.

In March 2018, AEP appointed PT Meganesia Tirta Foresta to conduct HCS assessment at PT KAP. More details are available here: [http://www.angloeastern.co.uk/~media/Files/A/Anglo-Eastern/documents/HCV%20and%20Scarred%20Tribal%20Sites.pdf](http://www.angloeastern.co.uk/~media/Files/A/Anglo-Eastern/documents/HCV%20and%20Scarred%20Tribal%20Sites.pdf)
While waiting for the completion of the HCS assessment report, Wilmar continues to monitor PT KAP’s activities on a monthly basis to ensure PT KAP will uphold their commitment to the moratorium.

<table>
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<tr>
<th>Date</th>
<th>Event Description</th>
<th>Reporting Body/Source</th>
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<tbody>
<tr>
<td>21 July 2017</td>
<td>Non-compliant palm products in and around the Leuser Ecosystem from PT. Agra Bumi Niaga’s (ABN) allegedly enter Wilmar’s supply chain through its supplier, PT Ensem Sawita (ES)</td>
<td>Rainforest Action Network (RAN)</td>
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<tr>
<td></td>
<td>Report can be found here</td>
<td>--------------------------------------------------------------------------------------</td>
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<tr>
<td>12 June 2017</td>
<td>Alleged labour rights issues in PT Murini Sam Sam (MSS), a subsidiary of Wilmar in Riau.</td>
<td>CNV International and Centre for Research on Multinational Corporations (SOMO).</td>
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<tr>
<td></td>
<td>Report is available here</td>
<td>--------------------------------------------------------------------------------------</td>
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Wilmar has mapped all suppliers who operate mills within a 50-km radius of the Leuser Ecosystem, and engaged directly with all these suppliers to ensure that we have clearly communicated our NDPE Policy requirements to all suppliers who may be at risk of sourcing from illegal or protected areas within the Leuser Ecosystem. Most recently in April 2017, we have checked and confirmed that all these suppliers, including PT Ensem Sawita (ES) were not sourcing from PT Agra Bumi Niaga (ABN). Following RAN’s latest report, we contacted PT ES for clarifications and were informed that PT ES was not aware that their FFB supplier PT. Putri Hijau was acquired by PT ABN. Therefore, PT ABN’s FFB may have entered PT ES’s supply chain through PT Putri Hijau.

Wilmar met with PT ES on 28 July 2017, PT ES informed that they have ceased sourcing from PT ABN since early July 2017 when they were alerted that PT ABN’s fruits had entered their supply chain. PT ES decided not to resume purchase from PT ABN until this FFB supplier has been assessed and implemented the necessary corrective actions as per recommended by an independent assessor.

Together with TFT, one of PT ES’s buyers has scheduled a site visit to the operations of PT ES & PT ABN in early August. To avoid duplicating the same assessment, PT ES has agreed to share the assessment report with Wilmar for our deliberation of next course of action. The field assessment report has been shared with Wilmar in October 2017 and we have met with PT ES on 17 November to follow up with them on their progress.

While PT ES is committed to close the gaps identified during the assessment, we continue to monitor their progress, which includes regular physical meetings with PT ES where we will provide support to improve their sourcing practices.

Wilmar was made aware of labour rights concerns in our operations at PT Murini Sam Sam (MSS) in January 2017. We immediately reached out to Konfederasi Serikat Buruh Sejahtera Indonesia - HUKATAN (KSBSI-HUKATAN), a national union affiliated with CNV who organised the meetings for SOMO’s researcher with PT MSS’s workers in January 2017.

Wilmar met with the Chairman and Secretary General of DPP F Hukatan, as well as the Vice President of KSBSI on 13 January 2017, at KSBSI’s office in Jakarta. At the meeting, we sought
to gain more understanding of KSBSI’s field visit and to address any concerns that may have arisen from it. The outcome of the meeting was positive as Wilmar accepted KSBSI’s proposal to support the union in extending their network in our refinery operations, as well as providing them avenue to provide PPE training for Wilmar’s staff in various locations.

On 10 May, Wilmar was given the opportunity to review the draft report from SOMO following their interview with our workers in January. Upon receipt of the draft report content, we immediately conducted an internal field verification on the allegations.

Based on the outcome of the field verification, Wilmar responded to SOMO, and clarified the allegations and provided input to correct several factually wrong information at the draft report.

Please see Wilmar’s detail responses to the draft here.

Wilmar has also met with SOMO in Amsterdam on 4 July 2017 to establish direct engagement with CNV, and their research partner, Centre for Research on Multinational Corporations (SOMO).

In our ongoing engagements with KSBSI - Hukatan, Wilmar has recently accepted their invitation to speak at their training event on Industrial Relations and Worker’s Right, in Riau, from 16-17 July 2017. Wilmar’s Industrial Relations Manager, Mr. Feberianta Ginting, together with the Head of Industrial Relations Supervision Division of the Manpower Office of Bengkalis Regency, the Head of Social Insurance Administration Organization (Badan Penyelenggara Jaminan Sosial, BPJS) Dumai Branch, and the Head of KSBSI-HUKATAN were the speakers at the training event. Representatives from PT MSS also attended the training sessions to gain more insight on provisions of unions, the national health insurance scheme, as well as national regulations applicable in the field of industrial relation. As of end December 2017, Wilmar has carried out three similar co-training sessions on workers’ rights and improving industrial relations.

Wilmar’s ongoing positive engagements with HUKATAN resulted in the establishment of a Collective Labour Agreement (CLA) on 31 October 2017 for our palm oil mill at PT Bumi Pratama Khatulistiwa, where we have adopted the KSBSI-HUKATAN multiple site work agreement template for our workers there.
In early 2018, CNV filmed at PT MSS and speak to our workers on camera. The video produced wholly by CNV is available in [English](#) and [Bahasa Indonesia](#).

In June 2018, Wilmar has published a case Study on how [Collective Action with CNV & HukatanKSBSI Makes Positive Impact in Labour Improvements](#).

Wilmar continues its’s constructive engagement with CNV and had a follow up meeting with CNV on 20 June in Rotterdam to explore further collaboration with the organisation.

| N32 | 7 February 2017 | Alleged deforestation, land grabs and indigenous rights violations by Myanmar Stark Prestige Plantation (MSPP), a subsidiary of the Samling Group in Myanmar. Report can be found [here](#) | A coalition of non-governmental organisations (NGOs) | Wilmar immediately initiated engagement with the Samling Group when allegations of non-compliance with Wilmar’s Sustainability Policy were brought to our attention.

Further meetings were held with Samling Group on 6 March 2017 and 15 May 2017, where they clarified its position on the allegations that are backed with relevant supporting documents about their operation in Myanmar. Moratorium on land clearing activities at their Myanmar operation was imposed since February 2017, and the company has engaged assessor to conduct the relevant assessments to ensure that they are in compliance with the NDPE policy requirements.

Through our own monitoring and due diligence, we have also initiated discussion with Samling on their operation in Indonesia, Malaysia and Papua New Guinea (PNG) since August 2017. We understand that Samling was in the process of divesting their PNG concession in 2017, and the divestment process has officially completed in early 2018.

Samling has also committed to a moratorium on land clearing activities in their Malaysia and Indonesia operation. All the relevant assessments has to be conducted prior resuming their land clearing for palm planting in the future. In order to gain further insights on their operations, it was agreed during a meeting in January that Wilmar’s team will be visiting the site in Sarawak at the end March 2018.

Our last meeting with the supplier was on January 2018.

| N31 | 3 February 2017 | Non-compliant palm products in and around the Leuser Ecosystem allegedly enter Wilmar’s supply chain | Rainforest Action Network (RAN) | Wilmar immediately initiated engagement with Koperasi Prima Jasa (KPJ) when allegations of non-compliance with Wilmar’s Sustainability Policy were brought to our attention.

Wilmar has offered its assistance to KPJ to verify the allegations raised by RAN on PT KPJ’s Fresh Fruit Bunches (FFB) supplier, PT. Agra Bumi Niaga’s (ABN) operation in and around the...
Leuser Ecosystem. KPJ has decided to put on hold purchases from PT ABN. Wilmar’s team conducted a field assessment on PT KPJ during 10 – 11 July 2017, and verified that KPJ has not sourced from PT ABN since February 2017.

After the field assessment, we have provided further support to PT KPJ by developing a Support for Transformation Programme (SFT), focussing in improving KPJ’s sourcing practices. Four site visits over a year-long period are planned in this programme, where first SFT visit was conducted from 16 – 20 October 2017.

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<tr>
<th>Date</th>
<th>Event</th>
<th>Source</th>
<th>Details</th>
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<tbody>
<tr>
<td>N30 19 December 2016</td>
<td>Alleged clearance of forested peatlands by PT Solusi Jaya Perkasa and PT Dinamika Graha Sarina, subsidiaries of PT Tunas Baru Lampung Tbk (TBL) from Sungai Budi Group.</td>
<td>Chain Reaction Research (CRR)</td>
<td>Prior to the release of the CRR report, Wilmar had been made aware of TBL's non-compliance with Wilmar’s Sustainability Policy following the Group’s monitoring activity. Engagement was immediately initiated with the supplier and a further meeting was held with TBL in October 2016, January and May 2017, where we shared the requirements of our NDPE policy. Wilmar managed to secure commitment from TBL to adhere to NDPE policy and to halt further land clearing. However, our internal monitoring detected ongoing land clearing activities. Wilmar’s last purchase from TBL was on February 2018.</td>
</tr>
<tr>
<td>N29 14 December 2016</td>
<td>Non-compliant palm products in and around the Leuser Ecosystem allegedly enter Wilmar’s supply chain through its supplier, PT Raja Marga (RM).</td>
<td>Rainforest Action Network (RAN)</td>
<td>Prior to the report being officially released by RAN on 14 December 2016, Wilmar has issued a statement on 8 December 2016, responding to Australian Broadcasting Corporation’s (ABC News) media query specifically on RAN’s allegations on Wilmar being linked to deforestation in the Leuser Ecosystem. Wilmar’s statement is available <a href="#">here</a>. Through Wilmar’s own monitoring and due diligence, we have put on hold purchases from PT RM in October 2016 when we discovered PT RM supplying non–compliant palm products to Wilmar’s facility. Wilmar will continue its engagement with PT RM to re-emphasise its NDPE Policy and assist the supplier to develop a robust FFB sourcing policy.</td>
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</table>
### Following companies were allegedly involved in labour rights issues in Indonesia.

1. PT Abdi Budi Mulia (ABM)
2. PT Hamparan Masawit Bangun Persada (HMBP)
3. PT Sarana Prima Multi Niaga (SPMN)

Report can be found [here](#).

### Wilmar

As the organisation who issued the report has declined to raise their concerns as a grievance, Wilmar has taken the initiative and responsibility to report and investigate the allegations following our Grievance Procedure. Dialogue has been initiated with the suppliers, while verification of the allegations is ongoing.

#### i. PT Abdi Budi Mulia (ABM)

Together with The Forest Trust (TFT), Wilmar conducted a field visit to PT ABM from 13 - 17 December 2016. PT ABM was cooperative in providing documentation for review and setting up all the interviews that were requested. Interviews were conducted with 45 workers (5% of PT ABM’s labour force made up of monthly and freelance daily workers), nine sub-contracted workers, three board members of the workers' union, 15 members on the board of the Petani Plasma Cooperative (part of PT ABM's supply chain), the village head and a school vice-principal. The Executive Summary is available [here](#).

A meeting was further held with PT ABM on 17 March 2017, where Wilmar and TFT discussed the findings and action plan with PT ABM. PT ABM is also participating in Wilmar’s Support for Transformation Programme (SFT), where a detailed labour practices improvement workplan is developed by Wilmar and TFT for PT ABM. Four site visits over a year-long period are planned in this labour programme. More information about the programme is available [here](#).

In November 2017, PT ABM was invited to speak at Wilmar’s BSR Capacity Building workshop to provide supplier testimonial on PT ABM’s process and journey in improving their labour practices. More than 60 participants from over 30 companies attended the workshop.

#### ii. PT Hamparan Masawit Bangun Persada (HMBP)

Wilmar initiated engagement with PT HMBP, and its parent company PT BEST, in October 2016 when the allegations of labour rights issues in PT HMBP were brought to our attention. After several Contact attempts, the first meeting with PT HMBP was finally held on 18 January 2017. A few more meetings were held in February, March and May. However, our engagement yielded little results in getting PT HMBP to agree to a field visit. Therefore, Wilmar has decided to put on hold purchases from PT BEST with effect from June 2017.

#### iii. PT Sarana Prima Multi Niaga (SPMN)

Wilmar and TFT met with PT SPMN (wholly owned entity under TSH Group) on 20 December 2016 to discuss the allegations raised in the NGO report in further detail. From early 2017,
PT SPMN has been engaged within various RSPO due diligence processes. PT SPMN’s process with the RSPO are as follows:

i. 27 to 31 March 2017 - RSPO certification surveillance audit with special focus on labour issues

ii. 3 April 2017 - RSPO meeting with the TSH Head of Sustainability

iii. 19 April 2017 - Further discussion with RSPO Secretariat on progress updates of labour issues

iv. November 2017 – RSPO labour issues assessment conducted by Profundo

PT SPMN has had several progress update meetings with Wilmar and have shared information and evidence on of the actions and improvements that have taken place since December 2016. Actions from PT SPMN have included:

• Introduction of system of payment of “top-up” wages to meet at least minimum wage for workers who have not met their KPI targets based on the piece rate system

• Conversion of temporary contracts to permanent employment for all workers – including workers previously on temporary contracts

• Reduction of paraquat use, with total elimination of use by 31 December 2017

• Signboards to reinforce their No Child Labour policy on site, and counter checking of census of children on-site with school enrolment data

• Immediate removal of discriminatory practice in regard to menstrual leave. Women are no longer subjected to medical checks for menstrual leave Supplier support and management Wilmar’s Progress in Strengthening Labour Practices 4 Dec 2017 Page 13 of 14

• Records and results of regular medical checks are shared with and explained to chemical workers, including those workers have been transferred to non-chemical work if exposure levels are too high o Providing full compensation and a new position as a child caretaker to a worker who had been severely injured in an accident involving paraquat PT SPMN has committed to continually improving their labour practices, and Wilmar is now establishing stronger collaboration to ensure that we are able to check-in on progress made.

In May 2018, PT SPMN has appointed MEC as an independent party to strengthen their action plan including monitoring of issues raised in the November 2016 report. The MEC assessment is planned for June 2018. In the meantime, PT SPMN is in a continued process with the RSPO regarding these issues from 2016. The RSPO is aware of the appointment of MEC, and has agreed to this arrangement of providing regular updates to the RSPO.
Identified labour rights issues in the following Wilmar operations in North Sumatera:

i. PT Daya Labuhan Indah
ii. PT Perkebunan Milano

Wilmar has been made aware of labour rights issues in our operations in North Sumatra. We have voluntarily raised this as a grievance in order to be transparent and accountable to all stakeholders and to share the findings of our investigations, and the actions we have taken to mitigate issues which have been identified.

In August 2016, we conducted an internal assessment in the subsidiaries in question and work is underway to resolve the issues. The assessment report is available here.

We have also initiated an internal review process which is still ongoing:

<table>
<thead>
<tr>
<th>Date</th>
<th>Process</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 August 2016</td>
<td>Received information on labour-related issues</td>
<td>PT Daya Labuhan Indah (DLI), PT Perkebunan Milano (PM)</td>
</tr>
<tr>
<td>12 August – 2 September 2016</td>
<td>Initial assessment and consultations to verify the issues</td>
<td>PT DLI, PT PM</td>
</tr>
<tr>
<td>September – October 2016</td>
<td>Conducted an inquiry into wage practices with the Human Resources (HR) Department of PT DLI and checked against the local government regulations on wages, PP No. 78/2015 (replacing PP No. 8/1981) to ensure compliance</td>
<td>Wilmar head office and regional office</td>
</tr>
<tr>
<td>November 2016</td>
<td>Planned 2nd assessment to monitor and check on progress</td>
<td>PT DLI, PT PM</td>
</tr>
<tr>
<td>December 2016</td>
<td>Planned site visit with BSR and Wilmar internal team in North Sumatra</td>
<td>PT PM</td>
</tr>
<tr>
<td>January 2017</td>
<td>Planned site visit with BSR and Wilmar internal team in Central Kalimantan</td>
<td>PT Mustika Sembuluh (PT MS)</td>
</tr>
</tbody>
</table>

Some of the identified issues are common challenges shared by the industry, and we seek to address and improve labour practices through our collaboration with Business for Social Responsibility (BSR), to review current labour practices in the palm oil sector in Indonesia.
More information about our collaboration with BSR can be found here. Our internal team has completed the second assessment from 28 November - 2 December 2016. The assessment report is available here.

BSR has completed field assessments in PT PM and PT DLI from 12-15 December 2016. The assessment methodology involved visual observations, interviews, focus group discussions, and documentation review. Over 100 employees, mostly non-management workers, were interviewed by BSR. More information on the preliminary findings of the independent assessment can be found here. The BSR public report was finally delivered to Wilmar in end March 2017; the report is available here.

Following the field assessments on PT PM and PT DLI in North Sumatra in December 2016, BSR has also completed assessment on PT Mustika Sembuluh (MS) in Central Kalimantan in January 2017. The methodology adopted by the independent assessor is similar to the one used in North Sumatra, which included interviewing a total of 56 non-management workers without the presence of management personnel. The preliminary findings of the assessment is enclosed here. The full report by BSR on PT MS will follow.

As part of our investigation process, we have met with union representatives from Serikat Pekerja Seluruh Indonesia and Serbundo on 9 Jan 2017. The meeting was to clarify labour issues in PT Milano and PT DLI, and to seek feedback and suggestions.

In addition to the assessments by BSR, PT PM has also undergone a two-day independent assessment by the International Sustainability and Carbon Certification (ISCC) in early February 2017. Please contact the Wilmar Grievance Manager (grievance_procedure@wilmar.com.sg) directly for more information on the ISCC assessment. Based on report, some of the key findings include:

- “That no children are present on the plantation to help their parents”,
- “That the workers are not paid a minimum wage on the basis of achieving a target in terms of tons FFB, number of sprayed tanks or number of fertilizer bags applied to the land”
- “That the minimum monthly wage is always paid to permanent workers regardless of their performance”
- “That non-permanent workers are paid 90,000 IDR (= min. wage) even if they don’t achieve their targets.”

A compilation of findings and our action plan are summarized from both our internal assessments, as well as external assessments completed by Business for Social Responsibility.
(BSR), Roundtable on Sustainable Palm Oil (RSPO) and International Sustainability & Carbon Certification (ISCC). We released the action plans in April 2017 and we reported our progress in June 2017.

On 13 June 2017, Wilmar met with Amnesty International to discuss the action plan and progress. We are committed to providing regular updates to Amnesty International on our progress of implementing our action plan.

In December 2017, Wilmar released a One Year Progress Update on Labour Review and Improvement Programme. This provides information on the improvements Wilmar has put in place over the last year including the progress on the work undertaken in collaboration with Verité.

In February 2018, Wilmar provided further updates on a wide range of initiatives to provide a better and more conducive environment for our employees to live and work in.

As a continuation of our engagement with Amnesty International, a meeting was held in Amnesty International’s office in London, on 18 June. In the meeting, we have provided updates to Amnesty International on our progress in implementing our action plan and challenges we faced on the ground. We have committed to strengthen our efforts, specifically on the procedures in providing remediation to workers and address the concern of suitability of PPE for tropical country. We will continue to provide regular updates to Amnesty International on the various programmes we have put in place, including our collaboration with our peers in the Decent Rural Living Initiative and our collaboration with Verite.

| N26 | 27 September 2016 | Alleged forest and peatland destruction, permit irregularities and lack of Free, Prior and Informed Consent (FPIC) to developments by PT Nabire Baru, a subsidiary of Goodhope, in Nabire, Papua. Report is available here | Greenpeace | Goodhope has issued a statement immediately after Greenpeace released the report, where Goodhope has committed to continue engagement with Greenpeace, and other external stakeholders (NGOs and professional organization) to carry out a detailed assessment on their project.

RSPO has been investigating the social conflict issues since April 2016 when the case was brought to their attention by Yayasan PUSAKA. A joint field verification visit consisting of teams from RSPO, Yayasan Pusaka and Goodhope was conducted from 27 - 28 September 2016. Goodhope has a further meeting with Yayasan Pusaka and Forest Peoples Programme (FPP) on 19 October 2016, and with Greenpeace on 26 October 2016. |
Wilmar met with Goodhope on 8 November 2016 where Wilmar re-emphasised its NDPE Policy and sought clarification and updates on their progress in addressing issues raised in Greenpeace report. Goodhope has publicly reported their progress update on 2 December 2016.

RSPO has registered this case as an official complaint in December 2016.

A meeting was further held with Goodhope on 7 March 2017 to follow up with Goodhope on their progress update, where Goodhope has shared with Wilmar their intention to undertake a three-pronged approach to address the issues raised by Greenpeace: (1) to conduct all necessary assessments, including the HCS assessment and detailed soil survey; (2) to develop a robust and stringent Sustainability policy (3) to announce and communicate the policy to their external stakeholders.

Another follow up meeting was held with Goodhope on 10 April 2017, where Goodhope shared with Wilmar their progress update and detailed response to a recent Greenpeace Bulletin. Goodhope's official response is available here.

Goodhope has also attended Wilmar’s three-day training workshop focussing on the implementation of Wilmar’s Policy in April 2017. Goodhope officially released their Sustainability Policy on 5 May 2017 and published their progress updates on regular basis.

- Progress made up to May 15, 2017
- Progress made up to June 15, 2017
- Progress made up to July 15, 2017
- Progress made up to August 15, 2017
- Progress made up to September 15, 2017
- Progress made up to October 15, 2017
- Progress made up to November 15, 2017
- Progress made up to January, 2018
- Progress made up to February, 2018
- Progress made up to March, 2018

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<tbody>
<tr>
<td>N25</td>
<td>27 September 2016</td>
<td>Alleged clearance of forested peatlands by PT Persada Kencana Prima, a subsidiary</td>
</tr>
<tr>
<td>Greenpeace</td>
<td></td>
<td>Prior to the report being published by Greenpeace, Wilmar has initiated engagement with TH Plantation Berhad (THP) since August 2016, following the Group’s monitoring activity that brought the alleged issues to the Group’s attention.</td>
</tr>
<tr>
<td>Date</td>
<td>Incident Description</td>
<td>Source</td>
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<tr>
<td>19 September 2016</td>
<td>Alleged use of fire and hostage-taking by PT Andika Permata Sawit Lestari (APSL). Media report is available <a href="#">here</a>.</td>
<td>Media</td>
</tr>
<tr>
<td>1 September 2016</td>
<td>Alleged rainforest destruction, including through illegal burning and lack of Free, Prior and Informed Consent (FPIC) to new developments, by Korindo Group in Indonesia’s Papua province. Report can be found <a href="#">here</a>.</td>
<td>Mighty</td>
</tr>
<tr>
<td>5 September 2016</td>
<td>Alleged use of fire and hostage-taking by PT Andika Permata Sawit Lestari (APSL). Media report is available <a href="#">here</a>.</td>
<td>Media</td>
</tr>
</tbody>
</table>

Wilmar met with THP on 10 October 2016, where Wilmar re-emphasised its Policy and sought clarification on the allegations. THP informed that they had ceased land clearing activities for several months for operational reasons.

A meeting was further held with the management of THP on 2 June 2017, where the management of THP has agreed to a suspension on further land-clearing while THP review next steps for the said area.

Wilmar conducted a joint site visit with TFT to PT Persada Kencana Prima (PKP) from 31 July – 4 August 2017 to assess the situation on the ground and developed action plan for the area. Wilmar’s team met with THP’s management on 6 November 2017 to share the assessment report. While Wilmar continues to follow up with THP on improvement on their sustainability practices, the moratorium on land clearing is still in place at PT PKP.

APSL has agreed to a field assessment jointly conducted by Wilmar and TFT in September 2017 to assess the situation on the ground and develop an action plan for the company.

In the meantime, we will continue our dialogue with PT APSL to ensure compliance with law and our Sustainability Policy.
<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
<th>Responsible Party/Source</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 August 2016</td>
<td>Alleged community rights violations and land conflict by PT Sintang Raya.</td>
<td>Link-AR Borneo</td>
<td>Dialogue was initiated with PT Sintang Raya on 5 August 2016. Together with The Forest Trust (TFT), Wilmar has convened a meeting on 16 September 2016 at PT Sintang Raya’s office in Pontianak, where PT Sintang Raya has provided the necessary supporting documents and clarified its position on the allegations. Wilmar continues its dialogue with PT Sintang Raya while verification of the document is ongoing.</td>
</tr>
<tr>
<td>6 April 2016</td>
<td>Illegal palm oil in and around the Tesso Nilo region allegedly enter Wilmar’s supply chain.</td>
<td>Eyes on the Forest (EoF)</td>
<td>Dialogues were initiated with suppliers shortly after receiving the report. Wilmar does not purchase any Fresh Fruit Bunches directly from this area; and the Group expects its crude palm oil suppliers to fully comply with its Sustainability Policy. Wilmar will re-emphasise its Policy to the suppliers, clarify the allegations; conduct field audits and assess its findings accordingly, including developing a corrective action plan to address the issues in question. Wilmar’s statement is available here. On 2 June 2016, Wilmar attended a multi-stakeholder meeting with EoF and several palm oil companies named in the report to discuss the next course of action. We understand that a task force, headed by the Indonesian government, EoF and WWF, would be established to address illegal farming and communities in the park. A further meeting was held on 28 July 2016 to continue our dialogue in June. The Indonesian Ministry of Environment and Forestry (MoEF) setup a multi-stakeholder task force for Tesso Nilo Ecosystem Revitalization (Revitalisasi Ekosistem Tesso Nilo, RETN), composed of MoEF, Riau Provincial Government and NGOs including EoF members and Mitra Insani. In November 2016, Wilmar, together with other companies named in the report attended a meeting hosted by MoEF and RETN, where the companies were informed not to purchase illegal FFB coming from the Tesso Nilo National Park and its landscape. The identification of the illegal oil palm operators is the first and most crucial step in the removal of illegal FFB from the supply chain. During these meetings, Wilmar and the other companies requested for the list of companies which are considered illegal in the landscape, however this list has not been forthcoming.</td>
</tr>
</tbody>
</table>
In support of the RETN taskforce, EoF investigated the flow of illegal FFB from TNNP in June, July and August 2017, the report, titled “Enough is enough” was released on 8 June 2018. Three Wilmar’s mill suppliers were allegedly received illegal FFB originated from the TNNP in 2017. Detail as follow:

i. Asian Agri
   Please refer to Apical Group’s grievance list for detail updates: [https://www.sustainability.apicalgroup.com/grievances/](https://www.sustainability.apicalgroup.com/grievances/)

ii. PT Citra Riau Sarana (CRS)
   Together with TFT, Wilmar’s policy implementation partner, we have conducted assessment on PT CRS in April 2014. A follow up assessment was completed in December 2015, where we have provided guidance to PT CRS in improving their sourcing practices. We have continued to engage with PT CRS to ensure that we are able to remove the illegal FFB from their supply chain. Our last meeting with PT CRS management was in March 2018, and we are expected to conduct the next ground verification in PT CRS in July 2018.

iii. Sawit Mas Nusantara (SMN)
   The supplier has rebutted the report and clarify that they do not source illegal FFB from the TNNP. A meeting will be scheduled in July for further discussion with the supplier.

<table>
<thead>
<tr>
<th>N20</th>
<th>8 December 2015</th>
<th>Following companies were allegedly involved in burning, deforestation and exploitation of peatlands in Central Kalimantan, Indonesia.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>i. PT Rimba Harapan Saksti (RHS), PT Sarana Titian Permata (STP) and PT Kerry Sawit Indonesia (KSI), subsidiaries of Wilmar International.</td>
</tr>
</tbody>
</table>

Friends of the Earth (FoE)

Wilmar and Bumitama have both reaffirmed their commitment to No Burn Policy and refuted FoE’s assertions. Both companies have published their official statements shortly after the release of the report.


Bumitama’s statement is available [here](https://www.bumitama.com/gencob/paper/gencob_no_burn_policy_preferences_and_compliance/).

Updates will be provided when new information becomes available.
<table>
<thead>
<tr>
<th>Date</th>
<th>Alleged Activities</th>
<th>Dialogue/Update</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>N19 9 Oct 2015</td>
<td>Alleged clearance of High Conservation Value (HCV) area (orangutan habitat), including through illegal burning by PT Raya Padang Langkat (Rapala) in North Sumatra.</td>
<td>Dialogue was initiated with PT Rapala on 15 October 2015.</td>
<td>PT Rapala reported sightings of orangutan during land clearing (60Ha) for rubber planting. The company took the initiative to report their findings to Yayasan Orangutan Sumatera Lestari - Orangutan Information Centre (YOSL-OIC). YOSL-OIC held a meeting with PT Rapala in September to discuss this case, and following that, PT Rapala has committed to temporarily halt their land clearing and work with YOSL-OIC on orangutan monitoring. YOSL-OIC’s findings indicated there were two orangutans in PT Rapala’s concession. PT Rapala fully cooperated with YOSL-OIC and evacuated one orangutan on 2 October 2015. Evacuation was recommended by YOSL-OIC because PT Rapala’s concession is mainly shrub and does not connect directly to Leuser National Park. The small shrubby patch of 60 ha is surrounded by oil palm plantations in all corners so the area will not be a viable habitat for the pair of orangutans. They have also been recommended to conduct ongoing monitoring of orangutan presence on the ground. PT Rapala has zero burning policy and they refuted the allegations of clearing land by fire. The recent fire incidences were caused by extreme weather condition as well as oversights by their contractor. PT Rapala has taken immediate actions to put out the fires accordingly and there is no fire incidence thus far. PT Rapala has also terminated their contract with the contractor following the incidence.</td>
</tr>
<tr>
<td>N18 19 Nov 2015</td>
<td>The following companies were allegedly involved in forest and peatland destruction and causing forest fires in Borneo:</td>
<td>Dialogues initiated with our suppliers shortly after receiving the report. Here is the progress update on each supplier:</td>
<td>i. PT Andalan Sukses Makmur (PT ASMR) On 26 November, BAL has published an official statement here to clarify the fire incidences and land clearing activity in BAL’s concession. ii. PT Bumi Sawit Sejahtera (PT BSS)</td>
</tr>
</tbody>
</table>
| N17  | 11 November 2015 | Alleged human rights violation by Empresa Reforestadora de Palma de Petén SA (REPSA) and Dinant. Report can be found [here](#). | A coalition of non-governmental organisations (NGOs)  
Dinant  
Prior to the issues being officially raised by a coalition of NGOs on 11 November 2015, Wilmar has initiated a few rounds of dialogues with Dinant’s management since early 2014. A field assessment by TFT was carried out in April 2015.  
Dinant has also worked with the International Finance Corporation (IFC) and Consensus Building Institute (CBI) to identify and undertake measures recommended by the IFC Enhanced Action Plan (EAP) to support a peaceful resolution to the land conflicts.  
Some of the actions taken by Dinant included: a) the implementation of United Nations (UN) Voluntary Principles on Security and Human Rights (VPSHR); b) unilaterally withdrawing all firearms from all guards at its plantations, mills and manufacturing plants; c) developing and publishing its ethics standards, security and human rights policies, among others, d) training its guard force for compliance; and e) enhancing its community engagement programme by: i) conducting workshops to identify the social and environmental impacts of the plantations. Nine workshops were conducted thus far. |
| --- | --- | --- | --- |
ii) developing a Community Grievance Mechanism

As of April 2017, Dinant has fully repaid the balance of IFC’s outstanding loan and IFC has no further contractual relationship with the company. As of the date of repayment of the loan, Dinant had achieved material compliance with IFC’s Performance Standards, and successfully implemented the actions required of it as identified in the April 2014 EAP and their original Environmental and Social Action Plan (ESAP). IFC has also noted that, paramount among these action items has been Dinant’s progress in modernizing and professionalizing its approach to security activities. It adheres to the Voluntary Principles for Security and Human Rights (the first company in Honduras to do so) and now meets the requirements of IFC Performance Standard 4 (PS4). Notably, Dinant has expanded the VPSHR Implementation Program beyond its agribusiness operations to include all its operations in Honduras.

TFT and an independent consultant of a Guatemalan non-profit organization performed a monitoring field visit at Dinant’s premises in the first week of February 2017. Wilmar has met with Dinant management on 4 October 2017 to discuss the TFT recommendations from their visit, and the progress made on the IFC EAP, and next steps going forward. Wilmar will continue to engage with Dinant.

REPSA

Prior to the issue being officially raised by a coalition of NGOs on 11 November 2015, Wilmar has initiated a few rounds of dialogues with REPSA’s management a month before, following the Group’s media monitoring activity that brought the alleged issues to the Group’s attention.

The Forest Trust (TFT) conducted an assessment of the REPSA mill and a representation of the mills’ supply base from 16–21 November 2015. A follow-up visit took place in April 2016 where TFT met with REPSA’s executive management to discuss the development of an action plan to address the issues identified in the field visit.

REPSA submitted to Wilmar a detailed time-bound action plan which they have published a summary on their website. In addition, REPSA also announced two important policies 1) zero tolerance on violence and intimidation and 2) responsible palm oil production. Both have been undergoing public consultation. Wilmar’s key recommended action points to REPSA can be found here.
Wilmar met with the REPSA management on 24 August 2016 again for updates on the allegations of river pollution and kidnapping, as well as to review progress on their action plan.

The company confirmed that there is still no formal charges made against REPSA both allegations. In particular, the governmental investigation relating to the river pollution allegation is still ongoing, with no clear timeline.

REPSA has shown progress on the following fronts: a) the adoption of zero tolerance on violence policy and responsible palm oil production policy; b) engagement with NGOs; c) publication of Summary Action plan; d) publication of first progress report in September 2016.

In late 2016, TFT and the Consensus Building Institute (CBI) visited Sayaxché in Guatemala to jointly carry out a social-scoping exercise to assess the willingness of local stakeholders to participate in a participatory process for dialogue and resolution. A second visit was conducted in February/March 2017 to socialise the results of the social scoping exercise with the local stakeholders. REPSA appreciated the views, insights and recommendations presented, and have committed to considering collaborations with stakeholder groups to address them, where relevant. Links to the Scoping Report and Addendum

REPSA released their second action plan progress report in February 2017.

On 21 April 2017, Wilmar received a letter from a coalition of NGOs, alleging that REPSA has disrupted a meeting convened by the International Observer Mission for Human Rights in November 2016, and that a police report on the alleged incident has been filed. We immediately sought clarification from REPSA who informed that they were not aware of and not responsible for the happenings. Nonetheless, REPSA committed to fully cooperate with the authorities in the investigation of this case – see REPSA’s response here.

On 17 May 2017, REPSA released their third and final progress report on the Year 1 Action Plan. TFT conducted another monitoring field visit from 8 May 2017 to 12 May 2017 to assess their progress on key activities stipulated in the 12-month Action Plan. The final 12-month monitoring report can be found here.

By taking into consideration of the recommendations from the 12-month monitoring report, feedback from REPSA clients, and priorities identified by several key stakeholders, REPSA has
drafted an 18-month action plan (July 2017 – December 2018) to guide their next steps. The four short-term outcomes that REPSA are focussing, including:
1) Reach a credible, mutually-agreed upon resolution to the 2015 kidnapping incident, 2) Reach a credible, mutually-agreed upon resolution to the November 2016 allegations of intimidation, 3) Develop a Year 2 Action Plan that incorporates stakeholder input and has active stakeholder buy-in and support, and 4) In consultation with local organizations and communities, develop a detailed participatory roadmap for advancing stakeholder engagement.

Although REPSA has begun implementing this new 18th-month action plan, they continue to seek input from local stakeholders to improve the action plan and priorities. In the meantime, they are also exploring opportunities to seek key stakeholder’s participation in monitoring their progress. The first 4-month progress report on the 18-month action plan, including the above mentioned short-term outcomes, is expected to be published in November 2017.

Wilmar has also been closely in contact with several NGOs who has signed the joint letter, with the aim to bring transparency in the process and improve communication between different parties involved.

Wilmar has been actively engaging with REPSA in seeking resolution to the grievances, our recent meetings with REPSA was on 4 October 2017, in Guatemala and 27 November, in Bali. While REPSA has made progress in improving their practices, they have not met our expectations in meeting the agreed time bound action plan. Therefore, Wilmar has decided to put on hold purchases from REPSA with effect from December 2017.

<table>
<thead>
<tr>
<th>Date</th>
<th>Alleged Incident</th>
<th>Rainforest Action Network (RAN)</th>
<th>Dialogue</th>
</tr>
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<tbody>
<tr>
<td>N16</td>
<td>Alleged forest clearance and involvement in land dispute by Indofood Agri Resources.</td>
<td>Report can be found <a href="#">here</a>.</td>
<td>Dialogue initiated with PT Indofood Agri Resources on 28 September 2015. A meeting was further held with the management of the Indofood Group on 26 October 2015, where Wilmar re-emphasised its Policy to the Indofood Group and sought clarification from Indofood on the allegations. On 9 June 2016, Wilmar received a new report from RAN on alleged human rights and labour abuses in two oil palm plantations owned by the Indofood Group. Report can be found <a href="#">here</a>. RSPO is investigating the case and has engaged with Indodea and the NGOs who wrote the report. Accreditation Services International (ASI), commissioned by the RSPO, has conducted an assessment on one of Indofood’s plantations in North Sumatra on 18-22 July 2016; and</td>
</tr>
</tbody>
</table>
| N15 | 15 September 2015 | Allegedly responsible for slash-and-burn practices by PT Wai Musi Agro Indah (WMAI). | Centre for International Policy | Dialogue initiated with PT Wai Musi Agro Indah (WMAI) on 16 September 2015. WMAI acknowledged there was a reported alleged case of fire within their concession, which is currently under investigation by the local authority. Wilmar has put on hold purchases with effect from September 2015.

PT Wai Musi Agro Indah (WMAI) has fulfilled all their legal obligations in the fire case in May 2017. Together with TFT, Wilmar conducted a field visit from 7 – 11 August 2017 to assess their operation, especially on their fire prevention programme.

Based on the positive outcome from the field visit and WMAI’s commitment to continue to strengthen their fire prevention programme. Wilmar will resume business relationship with PT WMAI, following the lifting of the suspension order. A revisit will be conducted by June 2018 to assess WMAI’s progress in closing the gaps identified during the field visit in August 2017. |
|---|---|---|---|---|
| N14 | 19 August 2015 | Alleged construction of canal to prepare for deep-forested peatland clearance by PT Sumatra Jaya Agro Lestari (SJAL), a subsidiary of the Gunas Group, in West Kalimantan. | Greenomics | Dialogue initiated with PT Sumatra Jaya Agro Lestari (SJAL) on 19 August 2015.

A meeting was further held with the management of the Gunas Group on 28 August 2015 wherein the Gunas Group agreed to stop clearing activities on the alleged areas while dialogue with Wilmar continues.

Following the 28 Aug 2015 meeting, the Gunas Group has agreed to the following: |
| N13 | 30 July 2015 | Alleged human right and labour abuses in Malaysian grower Felda Global Venture’s (FGV) plantations. | A coalition of non-governmental organisations (NGOs) | FGV has responded to the allegations raised in the Wall Street Journal article “Palm-Oil Migrant Workers Tell of Abuses on Malaysian Plantations”; the statement can be found [here](#). The allegations against FGV, together with other recent labour and human rights related issues in the palm oil industry in Malaysia raised by concerned stakeholders, prompted the RSPO Secretariat to consider conducting an independent assessment on the competency of the RSPO Certification Bodies in identifying non-compliances related to these issues. – please refer the RSPO’s statement [here](#). Wilmars has initiated dialogue with FGV on first week of August 2015. A meeting was further held with Felda on 10 August 2015 to understand the matters and provide recommendation to FELDA to address the concern raised by stakeholders. On 14 August, RSPO had announced that they have engaged Accreditation Services International (ASI) to perform a compliance audit in September on a few FELDA units located in the area linked to the findings in the report. Additionally, FELDA has started the process to engage an independent consultant to conduct their own investigation into these allegations. FGV has provided a more detailed statement on clarifications and action points [here](#). On 26 October, RSPO has registered this case as official complaint. Progress updates is available [here](#). A few more meetings were held with FELDA thereafter. On 8 April 2016, Wilmar received a new report from Chain Reaction Research on alleged peatland and HCV/HCS forest clearance by PT Citra Niaga Perkasa (PT CNP) and PT Temila Agro Abadi (PT TAA) in Kalimantan. First meeting with FGV was held on 18 May 2016, where Wilmar emphasised its NDPE policy requirements to FGV and encouraged them to transparently report their progress in addressing the issues raised by concerned stakeholders. FGV has been providing regular progress update on their website including their progress working with RSPO’s compensation panel. [http://www.feldaglobal.com/sustainability/sustainability-response-team-progress-update/](http://www.feldaglobal.com/sustainability/sustainability-response-team-progress-update/) |

When Chain Reaction Research released another report in April 2017 on PT TAA’s alleged peatland clearance, Wilmar immediately reached out to FGV for clarifications. We understand that FGV has appointed Aksenta to conduct assessment to verify the report, and a stop-work order is in place since 25 April 2017.

In our meeting with FGV in June 2017, Wilmar has sought FGV’s commitment to continue upholding the stop work order until all the necessary assessments have been carried out in their concessions. Based on the latest update we received from FGV on 12 July, we were informed understand that the stop work order is still in place.

On 28 August 2017, FGV issued a letter committing:
1. adopting a permanent stop-work order at PT TAA and PT CNP.
2. adopting best management practices for existing plantation on peat, and endeavor to rehabilitate peatland that was developed after 25th August 2016.
3. continuing engagement with local communities and formulating community programmes with local partners

FGV has also enhanced their sustainability policy, where they would adopt the NDPE policy on all their concessions, irrespective of when the land was acquired or any previous RSPO New Planting Procedure approval was granted.

On 23 January 2018, Chain Reaction Research revealed FGV’s deforestation activities at PT APL, where 270Ha was cleared since September 2017. FGV has responded that they have halted all the land clearing and they will release their action plan once the HCS assessment are completed.

FGV continues to publicly reporting their progress and effort in addressing the grievances via their website, details as follow:
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<tbody>
<tr>
<td><strong>N12</strong></td>
<td>1 July 2015</td>
<td>Alleged clearance of forested peatlands by PT Patiware, in West Kalimantan. Report can be found <a href="#">here</a>.</td>
<td>Greenomics</td>
</tr>
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</table>

**N11** | 1 July 2015 | Alleged clearance of forested peatlands by PT Langgam Inti Hibrindo, a subsidiary of Provident Agro, in Sumatra Report can be found [here](#). | Greenomics | Dialogue initiated with Provident Agro on the first week of July 2015. A meeting was further held with Provident Agro on 9 July 2015. According to Provident Agro, PT LIH is committed to complying with Wilmar’s Policy of No Deforestation, No Peat and No Exploitation. The small land clearance (around 20-30 Ha based on Wilmar’s internal monitoring) on the alleged concession was due to encroachment activities by local communities; activities have ceased after swift intervention by PT LIH. In August 2015, PT LIH was investigated by police in relation to forest fires associated with land clearing. PT LIH reaffirms its commitment to following the legal proceeding and prevailing laws. Wilmar conducted a joint field audit with third-party auditor on the alleged PT LIH concession to assess the allegations. The field assessment revealed that some efforts have been undertaken by PT LIH to manage the fires, including reporting the fire incidences. |
to the authorities and conducting preliminary investigations and further provided recommendations for improvements on fire suppression and prevention. On 22 September 2015, it was reported in the media that the Indonesian authority has suspended PT LIH’s license. Wilmar halted purchases from PT LIH, pending further investigation and clarification.

On 25 January 2016, the Ministry of Environment and Forestry (KLHK) has issued a decree to reinstate PT LIH’s license after PT LIH has fulfilled the obligations requested by KLHK. Wilmar will resume business relationship with PT LIH, following the lifting of the suspension order.

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<tr>
<th>Date</th>
<th>Event</th>
<th>Description</th>
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<tr>
<td>17 June 2015</td>
<td>Alleged clearance of potential High Carbon Stock (HCS) forest by PT Varia Mitra Andalan (VMA), a subsidiary of Eagle High Plantations (EHP), in West Papua Province.</td>
<td>Report can be found <a href="#">here</a>. Dialogue was initiated with Eagle High Plantations (EHP), while verification of Greenomics report was ongoing. A further meeting was held with EHP on 8 July 2015 wherein EHP agreed to a moratorium on land-clearing activities in PT VMA. EHP has engaged a reputable HCS assessor to conduct the HCS assessments. A few more meetings were held with EHP thereafter. The HCS assessments were completed in 2016; as a result almost 50% of PT VMA’s concession will need to be conserved. The full report is now in the early stages of the peer review process. It is officially registered with the HCS Approach secretariat on their website <a href="http://highcarbonstock.org/registered-hcs-assessments/">http://highcarbonstock.org/registered-hcs-assessments/</a>. On 27 September 2016, Wilmar received a new report from Greenpeace alleging deforestation by PT Arrtu Energie Resources and exploitations in PT Tandan Sawita Papua. Report is available <a href="#">here</a>. Dialogue was immediately initiated with EHP to seek clarifications on the allegations. EHP issued the following statement responding to the report: <a href="http://www.eaglehighplantations.com/media-center/news-views/161-october-2016.html">http://www.eaglehighplantations.com/media-center/news-views/161-october-2016.html</a>. A meeting was further held with EHP on 8 November 2016, where Wilmar sought further clarification on the allegations. According to EHP, deforestation in PT Arrtu Energie Resources was carried out by surrounding communities. In order to avoid similar incident from recurring, EHP has committed to conduct land tenure study. EHP is also in the process of enhancing its firefighting effort to prevent similar fire incidences from happening in their concessions in the future.</td>
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<tr>
<td>Date</td>
<td>Event Description</td>
<td>Source/Details</td>
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<td>30 May 2015</td>
<td>Alleged deep peat clearing and social conflicts in several villages in Sumatra, by PT Setia Agrindo Lestari (PT SAL) an affiliate* of First Resources. *PT SAL is an affiliate in which First Resources has no management control.</td>
<td>Dialogue initiated with First Resources on first week of June 2015. A few more meetings were held with First Resources thereafter. Moratorium on PT SAL is in place while dialogue with First Resources continues. First Resources has issued a sustainability statement on 1 July 2015 which encompasses commitments similar to Wilmar’s. The statement can be found <a href="#">here</a>.</td>
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<tr>
<td>5 June 2015</td>
<td>Alleged clearance of potential High Carbon Stock (HCS) forest, peatlands and orangutan habitat by Sawit Sumbermas Sarana (SSS). Report can be found <a href="#">here</a>.</td>
<td>Following a couple of NGO reports about Sawit Sumbermas Sarana (SSS) on Deforestation issues, Wilmar initiated several rounds of dialogue with its management on compliance to Wilmar’s Policy. The case has not been resolved to Wilmar’s satisfaction. Wilmar has put on hold purchases with effect from 15 June 2015.</td>
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<td>6 May 2015</td>
<td>Alleged clearance of potential High Carbon Stock (HCS) forest by Mopoli Raya in the Leuser Ecosystem. Report can be found <a href="#">here</a>.</td>
<td>Dialogue was initiated with Mopoli Raya on 8 May 2015, while verification of Greenomics report was ongoing. A few more meetings were held thereafter. Wilmar has put on hold purchases with effect from 9 July 2015 pending resolution of this matter to Wilmar’s satisfaction. Mopoli Raya had engaged a registered consultant in September 2015 to conduct HCS assessment in their concession and the full assessment report was shared with Wilmar in February 2016. Mopoli Raya has committed to adhere to the recommendations made by the HCS consultant. Wilmar met with Mopoli Raya on 17 March 2017 and 28 July 2017 to discuss the community encroachment challenges in their concession. Wilmar has offered to conduct a field assessment to assist Mopoli Raya to address the issues on the ground. Wilmar continues to monitor their activities, and engagement is ongoing.</td>
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</table>
| N06 | 25 February 2015 | Alleged community rights violations and land conflict by PT Sandabi Indah Lestari (SIL). | Friends of the Earth (FoE) | Dialogue was initiated with PT SIL on 27 Feb 2015.

PT SIL has provided necessary supporting documents and replied officially to Wilmar clarifying its position on the allegations.

A further meeting was held with PT SIL on 18 March 2015 where PT SIL committed to continuing the mediation process with local communities. Wilmar has conducted three field visits to the alleged affected areas in 2015, in May, June and December, respectively.

Progress Update is available here. |
| N05 | 20 February 2015 | Alleged clearance of potential High Carbon Stock (HCS) forest by Austindo Nusantara Jaya Agri (ANJ), in Sorong, West Papua, Indonesia. | Mongabay | Dialogue was initiated with Austindo Nusantara Jaya Agri (ANJ) on 12 February 2015 immediately following Mongabay’s query to Wilmar; while verification of the report was undertaken at the same time. A meeting was further held with ANJ on 18 March 2015. HCS assessment was expected to be completed in April, but due to changes in the boundaries of their concessions, the report was delayed.

Wilmar has put on hold purchases with effect from April 2015 pending resolution of this matter to Wilmar’s satisfaction.

In early October, ANJ presented to the HCS Steering Group the challenges they faced in development in the high forested landscapes.

ANJ has officially adopted a comprehensive “No Deforestation, No Peat, No Exploitation” (NDPE) policy” in November 2016. |
| N04 | 19 February 2015 | Allegations on Land grab in Uganda by Bidco Uganda Limited, an affiliate* of Wilmar. | Friends of the Earth (FoE) | Wilmar has published a statement in 2015 to clarify its position on the allegations on its corporate website. The Ministry of Agriculture, Animal Industry and Fisheries, Government of Uganda has also released a statement responding to the FoE report.

As part of Wilmar’s No Deforestation, No Peat and No Exploitation Policy (“Policy”) commitment, we have been working with The Forest Trust (TFT), our policy implementation partner, to conduct an independent study on the level of compliance with the Policy by our subsidiaries and joint ventures such as OPUL. To that end, TFT has conducted several field assessments since 2014 on the Kalangala site to identify gaps, conduct training and monitor |
| N03 | 11 November 2014 | Alleged threats to the biodiversity of Leuser Ecosystem Potential forest clearance and impacts on biodiversity Report can be found [here](#). | A meeting was held with RAN on 19 November 2014 to discuss the report and understand the issues raised by RAN. Wilmar has identified mills in its supply chain which might be at risk of sourcing fresh fruit bunches (FFB) illegally from the Leuser Ecosystem, and completed a risk assessment on those mills.

In January 2017, the Compliance Advisor Ombudsman (CAO) has initiated an investigation on the land conflict issues upon received complaint from National Association of Professional Environmentalists (NAPE), representing a group of 38 smallholder farmers (Bugala Farmers Association) living in Kalangala, Bugala Island. CAO has officially closed the case as of March 2018. For more details, please refer to CAO’s report ([http://www.cao-ombudsman.org/cases/document-links/documents/Bidco-03ConclusionReport_January2018-English.pdf](http://www.cao-ombudsman.org/cases/document-links/documents/Bidco-03ConclusionReport_January2018-English.pdf))

Lawyers from the company and the complainants are in discussion to apply to the court for withdrawal of case, next hearing is now scheduled on 2 October 2018.

In April 2015, the High Court of Uganda has instructed a mediation to take place between the affected local community member, John Muyisa, who is the plaintiff of the case in question; the daughter of the original landowner Sylvia Gloria N.K Sempa; Bidco Uganda and Oil Palm Uganda Limited, both associate companies of Wilmar, to settle the land disputes in lieu of litigation. Only if no settlement is reached at mediation will the case be scheduled for a formal court hearing. The court hearing has been postponed a number of times; it was last due to take place on 19 December 2016 but has been rescheduled again to 8 March 2017.

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Following the risk assessments, dialogues with high priority suppliers commenced and the risk assessment results will be used to facilitate field assessments with those suppliers with the aim of achieving full compliance with Wilmar’s Policy.

This process is known as Aggregator Refinery Transformation (ART) plan, a collective and regional approach to addressing supplier non-compliance. It is a more effective way to drive transformation and effect real change on the ground; a detailed explanation on our ART plan is available on our website:

Progress updates is available here.
As part of our ART programme, we have:
1) identified and conducted field assessments on high priority suppliers supplying to our Kuala Tanjung refinery and Paya Pasir kernel crushing plant which included those operating in and around the Leuser Ecosystem. We visited 14 third-party supplier mills and one Wilmar mill in 2015.

2) consolidated the findings and summarised into an anonymised report known as the "Overarching Report" for sharing with all suppliers supplying into that refinery and kernel crushing plant. The report was uploaded on our website in June: http://www.wilmar-international.com/sustainability/progress/aggregator-refinery-transformation-art/art-overarching-reports/

3) shared the findings of the assessments and recommendations on improvements with our suppliers from that region through workshop, which was held in Medan in October 2016.

Wilmar had also organised a series of one-day regional-specific trainings open to all our suppliers and their suppliers, as well as any interested growers in that region in 2017. Our trainings will focus on following topics:
I. Environment – land use planning/ management, HCS/HCV, peat management + environmental impact management.
III Community – Conflict Resolution, FPIC, Land Tenure, Social Impact.

On 15 December 2016, Wilmar announced its commitment to addressing the deforestation challenge in the Leuser Ecosystem to become part of the existing multi-stakeholder process
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<tr>
<th>Date</th>
<th>Allegation</th>
<th>Stakeholder</th>
<th>Notes</th>
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<tr>
<td>N01 11 June 2014</td>
<td>Alleged clearance of potential High Carbon Stock (HCS) forest by Kencana Agri.</td>
<td>Greenomics</td>
<td>Meeting held with Greenomics on 7 October 2014. Business to business dialogues with Kencana Agri to explain the Wilmar integrated policy and request a halt to further plantation development while HCS studies are completed.</td>
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| N02 22 September 2014 | Alleged clearance of potential High Carbon Stock (HCS) forest, peat and orang-utan habitat by Genting. Potential forest clearance and impacts on biodiversity. Report can be found here. | Greenomics  | Initial meeting with Genting held on 2 October 2014, during which Genting committed to cease development on the two concessions in question until HCS studies have been undertaken. Genting also invited Wilmar and TFT to visit one of its mills and the surrounding FFB suppliers to better understand how it may be able to improve its practices.  
A meeting was held with Genting on 2 March 2015; both PT Citra Sawit Cemerlang (PT CSC) and PT Permata Sawit Mandiri (PT PSM) have completed the HCS studies. Genting has committed not to develop on HCS areas as recommended by their HCS assessors.  
Wilmar convened a meeting on 3 November 2015 between Genting Plantations Berhad (Genting Plantations), Greenomics, Aidenvironment and the Secretariat of Indonesia Palm Oil Pledge (IPOP) soon after Greenomics raised their concerns again about Genting Plantations’ alleged non-compliance with Wilmar’s Policy in their subsidiary PT Citra Sawit Cemerlang (CSC). Genting clarified that HCS assessment was conducted for PT PSM; and Land Use and Change Cover (LUCC) assessment, a vegetation cover stratification and identification of areas that could be HCS forest, for PT CSC as the HCS toolkit was not ready at that time.  
On 5 November 2016, Greenomics published a report, alleging that Genting continues to clear High Conservation Value (HCV) area and HCS forest.  
A few meetings were further held with Genting and others stakeholders, to understand the matter in greater detail. Wilmar’s statement is available here.  
On 16 March 2017, Genting announced that PT PSM has ceased to be subsidiary of Genting. Genting’s JV partner, Sepanjang Group has also divested from PT PSM since September 2017. |
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<th>Potential forest clearance and impacts on biodiversity Report can be found <a href="#">here</a>.</th>
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<tr>
<td>Kencana Agri has committed with effect from 19 January 2015 to a moratorium on land-clearing activities for the two of its subsidiaries, as well as a commitment to no deforestation on potential HCS forest areas until HCS assessments are completed and adopted. In addition, Kencana Agri has issued a sustainability statement which it will provide to its stakeholders in its forthcoming annual report. A copy of the statement has been provided to us which can be found <a href="#">here</a>.</td>
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