## Supplier Grievance Register

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<tr>
<td>1</td>
<td>Agro Sarimas Group</td>
<td>Reports of deforestation in PT Agro Sarimas</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht SD Oils South Africa</td>
<td>Agro Sarimas Group came into our supply chain via a third-party trader with relevant NDPE policies and programmes. Upon investigation, our third-party trader confirmed that the land clearing was not conducted by PT Agro Sarimas as it happened outside their concession boundary. This has been verified against their concession maps.</td>
<td>Mighty Rapid Response Report 22 (December 2019)</td>
<td>Resolved</td>
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<tr>
<td>2</td>
<td>Amanah Saham Pahang (ASPA)</td>
<td>Reports of deforestation in the following operations:</td>
<td>Indirect via third party supplier</td>
<td>SD Oils Langat SD Oils Pasir Gudang SDO Carey Island SD Oils Biodiesel</td>
<td>Amanah Saham Pahang (ASPA) enters our supply chain via a third party mill that sources FFB from ASPA. Our third-party supplier is engaging with ASPA, who have agreed to adopt an NDPE policy and have issued a moratorium on new clearing. ASPA have published an NDPE Policy, dated May 2020, on their website. Our third-party supplier has also introduced them to their recovery project partner to discuss potential recovery projects. Discussions are currently underway to firm up a recovery plan.</td>
<td>Mighty Earth - Rapid Response Report 30 (August 2020)</td>
<td>Ongoing Monitoring &amp; Engagement</td>
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| 3  | Anglo-Eastern Plantations      | Reports of deforestation and land conflicts in the following operations: | Indirect via third party traders | SD Oils South Africa SD Oils Zwijndrecht          | PT Kahayan Agro Plantation (PT KAP) is not specifically in our supply chain, although other affiliated Anglo Eastern Plantation mills are. PT KAP came into our supply chain via third party traders with relevant NDPE policies and programmes.  
- A review of PT KAP’s HCV report has been conducted and they have also agreed to a moratorium on land clearing. HCS assessment has been commissioned for PT KAP and the report is being peer reviewed. Confirmation was also received that PT KAP is not sourcing from PT Guntur Madu Agrotama (PT GMA).  
- AEP have officially published their NDPE policy, dated June 2019, on their website.  
- The HCSA peer review was completed in December 2019, but was disputed by Mighty Earth. PT KAP has agreed to continue the moratorium on new developments until the dispute is resolved.  
- PT KAP has completed a ground-truthed review of the area under dispute, which was suggested by the HCSA Secretariat as a pathway to resolve the issue. The HCSA team are planning to visit the disputed site, however, have been unable to make the visit due to the covid-19 pandemic. The objective of the visit is to | Mighty Earth - Rapid Response Report 1 (Nov 2017) Greenpeace - Deforestation Case Studies (Dec 2017) Mighty Earth - Rapid Response Report 14 (Apr 2019) Mighty Earth - Rapid Response Report 15 (May 2019) Mighty Earth - Rapid Response Report 24 Jan 2020) Mighty Earth - Rapid Response | Resolved                                 |
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<td>4</td>
<td>Asian Agri</td>
<td>Potential deforestation detected in: - PT Usaha Sawit Unggul</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>PT Usaha Sawit Unggul is not specifically in our supply chain, but affiliated Asian Agri mills are. Asian Agri came into our supply chain via third party traders with relevant NDPE policies. Third party traders have investigated the deforestation report by Mighty Earth and confirmed that the clearing detected is not in the PT Usaha Sawit Unggul concession. This has been verified against their concession maps.</td>
<td>Mighty Earth - Rapid Response Report 17 (July 2019)</td>
<td>Resolved</td>
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<td>5</td>
<td>Astra International Tbk</td>
<td>Reports of deforestation at PT Agincourt Resources Tbk (Astra Group's gold mining company)</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht SD Oils South Africa</td>
<td>Astra Agro Lestari (Astra Group's palm oil division) is in our supply chain indirectly via third party traders with relevant NDPE policies and commitments. This allegation is related to the gold mining industry and a commodity that we do not source. This is therefore not relevant to Sime Darby Oils’ supply chain. We are however open to discussions with stakeholders on how best to collaborate on deforestation events in the landscapes that we are connected to.</td>
<td>Mighty Earth - Rapid Response Report 33 (May 2021) Mighty Earth - Rapid Response Report 34 (June 2021)</td>
<td>Not Relevant</td>
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<tr>
<td>6</td>
<td>Bakrie Group</td>
<td>Reports of deforestation in the following operations: - PT Menthobi Mitra Lestari</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa SD Oils Zwijndrecht</td>
<td>PT Menthobi Mitra Lestari is not specifically in our supply chain, although other affiliated Bakrie Group operations are. Bakrie Group came into our supply chain via third party traders with relevant NDPE policies. Upon investigation of the deforestation report by Mighty Earth, it was verified that the clearing detected was not located in PT Menthobi Mitra Lestari’s concession. PT Bakrie Sumatera Plantations Tbk has now issued a public statement to the effect that ‘PT Menthobi Mitra Lestari is no longer a part of PT Bakrie Sumatera Plantations Tbk or Bakrie Group since 2017. Therefore, the case is now resolved as confirmed with Mighty</td>
<td>Mighty Earth - Rapid Response Report 16 (June 2019)</td>
<td>Resolved</td>
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| 7  | BBC Holdings Sdn Bhd | Reports of deforestation in the following operations:  
- Almabumi Plantation Sdn Bhd | Indirect via third party traders | SD Oils Zwijndrecht | Almabumi Plantation Sdn Bhd is not specifically in our supply chain, however another mill affiliated to BBC Holding Sdn Bhd is. Supplies from BBC Holding Sdn Bhd are predominantly via third party traders who have NDPE policies and commitments. We have started engagements to investigate the allegations, however, were informed that our third-party trader is no longer sourcing from them. | Mighty Earth - Rapid Response Report 21 (Nov 2019) | No Longer in Supply Chain |
| 8  | Borneo Pacific Group | Reports of deforestation in the following operations:  
- PT Arjuna Utama Sawit | Indirect via third party traders | SD Oils Zwijndrecht | Supply came through a third-party trader with NDPE commitments and an active supplier management programme. Borneo Pacific is no longer in SDO's supply chain as our third-party trader has ceased sourcing from them. | Mighty Earth - Rapid Response Report 23 (January 2020) | No Longer in Supply Chain |
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| 9  | Bumi Gading Prima          | Reports of deforestation in the following operations:                 | Indirect via third party traders | SD Oils South Africa                              | PT Bumi Agro is not specifically in our supply chain, but other affiliated mills are. Bumi Gading Prima came into our supply chain via a third-party trader with relevant NDPE commitments.  
We have initiated engagement with our third-party trader to investigate this allegation.  
| 10 | Bumitama / Lim Hariyanto Family | Reports of deforestation, peat clearance and fires, in the following operations: | Indirect via third party traders | SD Oils Zwijndrecht SD Oils South Africa           | PT Bumitama Gunajaya Abadi supply came through a third-party trader. Third party traders and Bumitama have relevant NDPE policies. Bumitama is also reporting regularly on progress of issues raised:  
- PT ASMR issues have been closed  
- PT BGA issues are closely monitored via RSPO complaints facility  
Further direct engagement with Bumitama confirmed that the areas located under the concession of PT Damai Agro Sejahtera (DAS) were not cleared but | Friends of the Earth - Up in Smoke Report (December 2015) | Resolved                   |
<p>|    |                            |                                                                      |                      |                                                 |                                                                                                                                                                                                                                                                   | Forest Hints - Article (April 2017) |                           |
|    |                            |                                                                      |                      |                                                 |                                                                                                                                                                                                                                                                   | Mighty Earth Rapid Response Report #22 (December 2019) |                           |</p>
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<td>BGA) - PT Damai Agro Sejahtera (PT DAS)</td>
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<td>impacted by forest fires during the peak of the dry season in September 2019. While the change in vegetation colour from the satellite imagery may seem as a result of land-clearing, the ground-truthing check identified varied extent of damage, from apparently un-impacted to scorched and burned vegetation. Bumitama’s response regarding land clearing in PT Andalan Sukses Makmur (as reported in Mighty Earth Rapid Response Report No. 23) is that ground checking in PT ASMR and hotspot reports revealed that this is not a result of land clearing, but a fire scar from forest fires that occurred in the area in September 2019. These areas are owned by the local community and thus enclaved from the management of the company. They were set-aside for conservation based on the rapid HCS assessment and peat delineation study conducted in April 2014 (refer to Bumitama’s 12 September 2014 Announcement: <a href="http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7">http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7</a>) (January 15, 2020)</td>
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<td>11</td>
<td>Bunga</td>
<td>Value Greenworld Sdn Bhd</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht</td>
<td>Value Greenworld Sdn Bhd Is not specifically in our supply chain. However, other mills owned by the parent company, Bunga Realty Sdn Bhd, are indirectly in our supply chain via spot market purchases. Reported By: Mighty Earth Rapid Response Report 32 (Jan 2021) Case Status: Ongoing Monitoring &amp; Engagement</td>
</tr>
<tr>
<td>12</td>
<td>Central Cipta Murdaya / Hardaya Plantations Group</td>
<td>Reports of deforestation in the following operations: - PT Hardaya Inti Plantations</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht SD Oils South Africa</td>
<td>The Hardaya Plantations Group came into our supply chain via third party traders with relevant NDPE policies. Hardaya Plantations has issued a moratorium on land clearing and are investigating assessments required for further development. They are also seeking support to strengthen capacity to manage NDPE requirements. The company is being monitored on a monthly basis by traders to ensure that they respect the moratorium on land clearing until NDPE requirements can be addressed. PT Hardaya Inti Plantations entered our supply chain via a spot purchase in the 1st quarter 2018. Raw materials sourced from Central Cipta Murdaya / Hardaya Plantations Group have not entered our supply chain since then. Reported By: Greenpeace - Deforestation Case Studies (December 2017) Case Status: No Longer in Supply Chain</td>
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<td>13</td>
<td>Dhanista Surya Nusantara</td>
<td>Reports of deforestation in the following operations: - PT Sabhantara Rawi Sentosa</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht</td>
<td>PT Sabhantara Rawi Sentosa is not specifically in our supply chain, but other affiliated mills are. Dhanista Surya Nusantara came into our supply chain via third party traders with relevant NDPE policies. The third-party trader who engaged with Dhanista Surya Nusantara advised that the reported land clearing was not conducted by the company, as it happened outside their concession boundary. This has been verified against their concession maps.</td>
<td>Mighty Earth - Rapid Response Report 21 (November 2019)</td>
<td>Resolved</td>
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<tr>
<td>14</td>
<td>Dharma Satya Nusantara (DSN)</td>
<td>Reports of deforestation in the following operations: - PT Putra Utama Lestari (area 1) and (area 2)</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht, SD Oils Liverpool</td>
<td>PT Putra Utama Lestari is not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from Dharma Satya Nusantara are predominantly via a third-party trader who have NDPE policies and commitments. We have started engagements to investigate the allegations. The third-party trader who engaged with Dharma Satya Nusantara advised that the reported land clearing was not conducted by the company, it happened outside their concession boundary. This has been verified against their concession maps.</td>
<td>Mighty Earth Rapid Response Report #20 (Oct 2019)</td>
<td>Resolved</td>
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| 15 | Djarum         | Reports of deforestation in the following operations:  
- PT Gemilang Sawit Kencana (PT GSK)  
- PT Hartono Plantations Indonesia (PT HPI Agro) | Indirect via third party traders | SD Oils South Africa | PT Gemilang Sawit Kencana (PT GSK) and PT Hartono Plantations Indonesia (PT HPI Agro) are not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from Djarum affiliated mills are predominantly via a third-party trader who have NDPE policies and commitments.  
Engagement with Djarum has been initiated since December 2017, when the allegations of non-compliance with NDPE policies were raised. Djarum committed to NDPE policy requirements and a moratorium on expansion, until relevant assessments are completed. Monthly monitoring is also in place to ensure commitment to the moratorium.  
Djarum is no longer in our supply chain since January 2021. | Greenpeace - Deforestation Case Studies (December 2017) | No Longer in Supply Chain |
| 16 | Double Dynasty Group | Reports of deforestation and land conflict in the following operations:  
- Radiant Lagoon Sdn Bhd | Direct purchases | SD Oils Bintulu  
SD Oils Carey Island KCP  
SD Oils Zwijndrecht | Radiant Lagoon Sdn Bhd and Mutiara Pelita Genaan Plantation Sdn Bhd are not specifically in our supply chain, although a mill affiliated to the Double Dynasty Group is.  
Status of engagement with Double Dynasty includes:  
- agreement to a stop-work-order for all new developments in their oil palm operations pending the outcome of relevant High Conservation Value and High Mighty Earth - Rapid Response Report 13 (March 2019)  
Mighty Earth - Rapid Response Report 15 | Ongoing Monitoring & Engagement |
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- commitment to secure the Free, Prior and Informed Consent (FPIC) of local communities before further expansion.  
- monthly monitoring of Double Dynasty's operations is in place to assess the implementation of these commitments.  

Progress updates:  
1. **Radiant Lagoon Sdn Bhd** (ME Report #13) - DD has confirmed with local regulators on terminating their work in Radiant Lagoon. An environmental consultant has been appointed to carry out work to rehabilitate historical clearing.  
2. **Mutiara Pelita Genaan Plantation Sdn Bhd** (ME Report #15) – DD confirmed that the alleged deforestation is not within Mutiara Pelita Genaan project boundary.  
3. **DDB Bawan Sdn Bhd** (ME Report #21) - DD confirmed that they have a stop work order on all land clearing on the sites at DDB Bawan (Block 13 Lot 34 and Lot 35) and have agreed to conduct soil investigation to confirm the site is peat or not peat. The final peat verification report dated September 2020 has been shared with us and confirms that the | (May 2019)  
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|    | Eagle High Plantation | Reports of peat clearing, deforestation in the following operations: - PT Arrtu Energy Resources - PT Tandan Sawit Papua | Indirect via third party traders | SD Oils Zwijndrecht | **PT Arrtu Energy Resources**  
PT Arrtu Energy Resources is not specifically in our supply chain, however other mills affiliated to Eagle High Plantation are. Supplies from Eagle High Plantation are via a third-party trader who have NDPE policies and commitments.  
Third-party trader reported that the area in question in PT Arrtu Energie Resources (AER) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. The fire outside PT AER’s concession area has spread into their concession and caused the fire in PT AER during the dry period. | Mighty Earth - Rapid Response Report 22 (December 2019)  
Mighty Earth - Rapid Response Report 34 (June 2021) | Resolved |

- soil within the concession area is categorized as neither muck nor peat as classified and defined by RSPO Peatlands Working Group 2 (PLWG-2).

Double Dynasty received the Final HCV Report for DDB Bawan from their ALS-licensed assessor in April 2021. They have submitted the report to us for further review.

Additionally, DDB Bawan is also currently undergoing Stage 2 of the MSPO Certification, due for completion in May 2021.
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<td>PT Tandan Sawit Papua</td>
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<td>Our third party trader has investigated this allegation and confirmed that the land clearing detected was not conducted by PT TSP. Eagle High, their parent company, is a member of RSPO since 2008 and they have also published their NDPE policy since 2018. Their land development are therefore being guided by the RSPO P&amp;C as well as NDPE policy requirements.</td>
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<td>PT TSP carried out a site visit to investigate the allegation and the report is available <a href="#">here</a>. Based on the outcome of the investigation, it appeared that the land clearing was conducted by villagers in the area without PT TSP’s consent. The community members claimed that they were unaware that the area belongs to PT TSP. PT TSP has therefore conducted socialisation and engagement with the local communities and managed to secure their commitment in stopping the illegal land clearance inside PT TSP.</td>
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<td>PT TSP has also engaged with local authorities, including Arso Timur District Government and Keerom Regency Government on the said issue, where the local authority has agreed to hold further meeting with the community leaders to provide clarity on the PT TSP boundary. In the meantime, PT TSP will put up</td>
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| 18 | Evershine Asset Management / Everbright Resources Corporation | Reports of deforestation and peat clearing in the following operations:  
- PT Kapuasindo Palm Industry | Direct purchases | SD Oils Bintulu | PT Kapuasindo Palm Industry entered our supply chain via spot purchases. There have been no supplies from them since 2018. | Mighty Earth - Rapid Response Report 5 (June 2018)  
Mighty Earth - Rapid Response Report 6 (July 2018)  
Mighty Earth - Rapid Response Report 12 (Jan 2019)  
Mighty Earth - Rapid Response Report 17 (Jul 2019) | No Longer in Supply Chain |
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<td>19</td>
<td>Felda Global Ventures (FGV)</td>
<td>Reports of labour issues in their Malaysian operations. Reports of deforestation and peatland clearing in Kalimantan, Indonesia: - PT Temila Agro Abadi - PT Citra Niaga Perkasa</td>
<td>Direct purchases and indirect via third party traders</td>
<td>SDO South Africa SDO Bintulu SDO Pasir Gudang SD Oils Langat SD Oils Port Klang SD Oils Zwijndrecht SDOils Carey Island</td>
<td>We have been engaging with FGV directly. Current updates on their progress on social and labour issues include: - FGV adopted a Social Compliance &amp; Human Rights action Plan in August 2017. - FGV is developing plans to address directives from the RSPO Complaints panel. FGV has submitted an appeal against the Roundtable On Sustainable Palm Oil (RSPO) Complaints Panel’s decision of 13 January 2020. Link to appeal: <a href="https://bit.ly/39Lq1V7">https://bit.ly/39Lq1V7</a> Link to press release: <a href="https://bit.ly/2woqEgn">https://bit.ly/2woqEgn</a> While we are not supplied by FGV's Indonesian operations, we have been engaging with FGV directly on the cases in Kalimantan, Indonesia. Current updates on their progress on these cases include:</td>
<td>Mighty Earth - Rapid Response Report 19 (Sep 2019)</td>
<td>Ongoing Monitoring &amp; Engagement</td>
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|    |               |        |                     |                                               | - FGV have a stop work order in place at **PT Temila Agro Abadi, PT Citra Niaga Perkasa and Asian Plantation Limited**.  
- HCS assessments have been commissioned and a peat restoration plan published.  
FGV is also reporting publicly on progress. Regular updates can be found at: [http://www.fgvholdings.com/sustainability/stakeholder-engagement/sustainability-updates/](http://www.fgvholdings.com/sustainability/stakeholder-engagement/sustainability-updates/) |                       |                       |                        |
|    |               |        |                     |                                               | **PT Temila Agro Abadi**  
Since April 2017, FGV has stopped all new planting in Kalimantan concession area and as a result this has caused pressure to the local community to develop their land on their own. FGV has lodged a police report dated 21/08/2018 to ensure that the authorities have been made aware of these incidences. Similarly, they have also confirmed these incidences to the RSPO. |                       |                       |                        |
|    |               |        |                     |                                               | **PT Citra Niaga Perkasa**  
FGV’s internal investigation revealed that the land that was cleared belongs to the local community. The land clearing has been carried out by the landowner since June 2019 for paddy planting. FGV wishes to reiterate that the stop work order for FGV Kalimantan (PT Citra Niaga Perkasa and PT Termila Agro Abadi) remains to |                       |                       |                        |
## Supplier Grievance Register

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- **be in force since May 2017 and since then FGV Kalimantan has not carried out any land clearing except for maintenance of roads, drains and boundary trenches.**

- **Sept 24, 2020** - Associated Press reported on a set of allegations of forced labor and human trafficking on the palm oil plantations of FGV Holdings Berhad (FGV).

- **Sept 30, 2020** – U.S. CBP’s Office of Trade directed the issuance of a Withhold Release Order (WRO) against palm oil and palm oil products made by FGV based on information that reasonably indicates the use of forced labor. The investigation also raised concerns that forced child labor is potentially being used in FGV’s palm oil production process.

- **Nov 13, 2020 - Nov 2020**
  FGV Holdings Berhad (FGV) clarified that they are fully committed to respecting human rights and to upholding labour standards in line with their commitment to the Sustainable Development Goals (SDGs) and to the United Nations Guiding Principles on Business and Human Rights (UNGPs).

  FGV issued a press statement in response to the WRO issued by U.S. CBP
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<td><a href="https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-withhold-release-order-wro-issued-by-u-s-customs-and-border-protection-cbp/?pagen=1%5C">Updates on FGV’s affiliation to the Fair Labor&lt;br&gt;Association (FLA) including FLA’s report on the</a></td>
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## Supplier Grievance Register

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</table>
| 20 | First Resources / PT Fangiono Agro Plantation (PT FAP) / Ciliandry Anky Abadi (CAA) Group | Reports of deforestation in the following operations:  
- PT Ketapang Agro Lestari  
- PT Citra Agro Abadi  
- PT Tirta | Indirect via third party traders | SD Oils Zwijndrecht | First Resources / PT Fangiono Agro Plantation (PT FAP) came into our supply chain via third party traders with relevant NDPE commitments. Engagements by third-party trader with the following companies revealed the following:  
**PT Ketapang Agro Lestari** - HCS/HCV assessment has been duly conducted prior the land clearing. The land development was guided by the outcome of the HCV/HCS assessment. No HCV/HCS area has been cleared.  
**PT Citra Agro Abadi** – Requirements of NDPE Policy shared. CAA has also attended third-party trader’s | Greenpeace - Deforestation Case Studies (December 2017)  
Mighty Earth - Rapid Response Report 9 (October 2018)  
Mighty Rapid Response Report 21 | Ongoing Monitoring & Engagement |
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<tr>
<td></td>
<td>Madu Sawit Jaya</td>
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<td>three-day training workshop in Jakarta focusing on the implementation of NDPE Policy in July 2017. Third-party trader 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. Third-party trader’s last purchase from CAA was on March 2018. <strong>PT Tirta Madu Sawit Jaya</strong> - the reported land clearing was not conducted by the company as it happened outside their concession boundary. <strong>PT Ketapang Hijau Lestari</strong> - High Carbon Stock assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organization with HCSA. Based on third-party trader’s monitoring, there was no land clearing at HCS area identified. FAP Agri has also published their NDPE policy in October 2019. <strong>PT Agrindo Green Lestari (PT AGL)</strong> PT AGL and other mills belonging to Ciliandry Anky Abadi (CAA) group are not in our supply chain. We are being linked to the reported issues in CAA and PT AGL via allegations that CAA, PT Fangiono Agro Plantation and First Resources all belong to the same parent group company. Our third-party trader, via whom PT</td>
<td>(Nov 2019) Mighty Earth Rapid Response Report 22 (December 2019) Mighty Earth Rapid Response Report 27 (May 2020)</td>
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</table>
| 21 | GAMA/GANDA Group | Reports of deforestation and peatland clearing in the following operations:  
- PT Agrinusa Persada Mulia (PT APM)  
- PT Agri prima Cipta Persada (PT ACP)  
- PT Graha Agro Nusantara (PT GAN) | Indirect via third party traders | SD Oils South Africa  
SD Oils Zwijndrecht  
The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated GAMA/GANDA mills are. Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:  
- GAMA/GANDA Group were suspended in June 2018 by our third-party trader. In September 2018, GAMA/GANDA published a sustainability policy and in February 2019 a progress report on the implementation of this policy [http://gamaplantation.com/assets/gama-files/pressrelease/Feb2019final-Gama_Plantation_Report.pdf](http://gamaplantation.com/assets/gama-files/pressrelease/Feb2019final-Gama_Plantation_Report.pdf). This includes an outline of recovery plans to address historical clearing. Following a review of progress made, the suspension on GAMA/GANDA was lifted by our third-party trader. | Greenpeace - Deforestation Case Studies (December 2017)  
Mighty Earth - Rapid Response Report 3 (February 2018)  
Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018) | Resolved |
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KPN Progress Report updates – October 2019
- 1. The Stop Work Order (SWO) is adhered to and monitoring is in place.
- 2. A comprehensive NDPE policy is being implemented.
- 3. Concession maps are shared at the request of interested parties.
- 4. Recovery Plans and Remediation work is being implemented which also include various socio-economic activities for the community.
- 5. Implementation a traceability system to ensure the legality of externally purchased FFB
- 6. ISPO certifications is in progress.
- 7. A grievance procedure to manage grievances and concerns has been adopted.
- 8. A Time Bound Action Plan (60 month) is available on their website.

- Third-party trader’s engagement with Gama confirmed that Gama has imposed a moratorium on
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<tr>
<td>22</td>
<td>Genting Plantations</td>
<td>Reports of deforestation, peat clearance, illegal planting and land conflicts in the following operations:</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht, SD Oils Pasir Gudang, SD Oils Carey Island</td>
<td>land clearing July 2018, no land clearing was carried out since then. The area in question are outside PT Agrinusa Persada Mulia’s HGU concession area. The land clearing was carried out by communities for farming and the construction of a road. PT Sumatera Unggul Makmur (PT SUM) - KPN clarified that the land in which the alleged clearing of 11 ha which took place at PT SUM is not owned and controlled by PT SUM. In fact, that site is in the midst of a Villages Boundary Dispute since 2011. The land dispute is between Village Tebas Sungai with Batu Makjage mediated by local District Head (Camat). <a href="http://kpnplantation.com/assets/gama-files/pressrelease/MightyEarth_ReportVol28-16June2020.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/MightyEarth_ReportVol28-16June2020.pdf</a></td>
<td>RSPO Complaints - Several (2013-2018) Environmental Investigation Agency - Papua Oil Palm Risk Exposure</td>
<td>Resolved</td>
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<td></td>
<td>- PT Citra Sawit Cemerlang</td>
<td>SD Oils Langat</td>
<td>PT CSC commissioned a High Carbon Stock (HCS) assessment in 2016, which was completed in October 2017. The HCS assessment has now been submitted for peer review and a stop work order has been implemented, pending the completion of the peer review process. Monthly monitoring is in place to assess the implementation of the stop work order.</td>
<td>- Potential HCS clearing detected on their PT Citra Sawit Cemerlang plantation in West Kalimantan in 2019.</td>
<td>- Genting started an HCS Study in PT CSC with AidEnvironment in Nov 2016. The field work stopped in May 2019. The alleged deforestation is not in the HCS area. Supplier has ceased clearing since May 2019. The final HCS assessment has been submitted to HCSA Secretariat at the end of May 2019. Peer review was completed in February 2020. See <a href="http://highcarbonstock.org/wp-content/uploads/2020/02/2.-HCSA-Peer-Review-Report-PT-CSC-final-130220.pdf">http://highcarbonstock.org/wp-content/uploads/2020/02/2.-HCSA-Peer-Review-Report-PT-CSC-final-130220.pdf</a></td>
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<td>- Cases on PT Dwie Warna, PT Kapuas Maju Jaya and PT Susantri Permai being monitored via the RSPO Complaints panel.</td>
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<td>PT Susantri Permai&lt;br&gt;<a href="https://askrspo.force.com/Complaint/s/case/5009000028Es0zAAC/detail">https://askrspo.force.com/Complaint/s/case/5009000028Es0zAAC/detail</a>&lt;br&gt;The complaint was officially closed on 20 Dec 2018.</td>
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<td>PT Dwie Warna, PT Kapuas Maju Jaya and PT Susantri Permai&lt;br&gt;<a href="https://rspo.my.salesforce.com/sfc/p/#90000000Yoij/a/0o000000bsJo/HTROf1NSn1X7teP4vaRatyWU.YwxpdLAXiRsjGksGg">https://rspo.my.salesforce.com/sfc/p/#90000000Yoij/a/0o000000bsJo/HTROf1NSn1X7teP4vaRatyWU.YwxpdLAXiRsjGksGg</a>&lt;br&gt;The complaint was officially closed in Dec 2018.</td>
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| 23 | Global Palm Resources | Reports of deforestation in the following operations:                | Indirect via third party traders | SD Oils Zwijndrecht                           | PT Prakarsa Tani Sejati (PT PTS) entered our supply chain via a spot purchase in the 1st quarter 2018. There has been no materials sourced from Global Palm Resources affiliated operations since.  
Out third party traders have relevant NDPE policies and their updates on engagements, include:
- Mighty Earth Rapid Response Report 14 alleged 62ha of deforestation by PT Prakarsa Tani Sejati (PT PTS) in West Kalimantan.
- engagement with PT PTS in April 2019 and investigated the alleged deforestation.
- the investigation concluded that the location of the clearing detected by Mighty Earth was not located in the PT PTS concession. This was clarified by the third-party trader at: [http://bit.ly/2v4XRca](http://bit.ly/2v4XRca). | Mighty Earth - Rapid Response Report 14 (April 2019) | Resolved |
| 24 | Goodhope           | Reports of deforestation in the following operations:                | Indirect via third party traders | SD Oils Pulau Laut  
SD Oils South Africa | The alleged land clearing occurred as a result of land fires on community-owned areas on 20th September 2019. The company has submitted a report to local authorities which concluded that the alleged land clearing occurred as a result of land fires on community-owned areas that occurred in the vicinity of PT RIM Capital. PT RIM Capital plans to support conservation of surrounding forest and mitigation of land fires through a number of initiatives which have been outlined. | Mighty Rapid Response Report 19 (Sep 2019)  
Mighty Rapid Response Report 22 (December 2019) | Resolved |
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| 25 | Incasi Group   | Reports of deforestation and peat clearing in:  
- PT Sumatera Jaya Agro Lestari  
- PT Arvena Sepakat  
- PT Makmur Agro Lestari | Indirect via third party traders | SD Oils South Africa  
SD Oils Zwijndrecht | The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated Incasi Group mills are and came into our supply chain via third party traders with relevant NDPE policies. Current updates on their progress include:  
- Dialogue initiated with PT Sumatra Jaya Agro Lestari (SJAL) in August 2015. PT SJAL agreed to a stop work order from 1 September 2015, pending HCV and HCS assessments.  
- In October 2018, Mighty Earth published a report on land clearing activities at SJAL. It was discovered that SJAL had accidentally cleared the area. SJAL immediately ceased the land clearing and reiterated their commitment to a moratorium on clearing, pending HCV and HCS assessments.  
- SJAL is expected to submit a recovery/rehabilitation plan commensurate with the scale of their non-compliant development. Monthly monitoring is conducted by our third-party traders.  
- Investigation on reported clearing by PT Arvena Sepakat revealed that the land clearing was not conducted by Arvena Sepakat. The area was illegally encroached and cleared by communities of Kelompok Sinaga. Police report has been lodged on the illegal | Mighty Earth - Rapid Response Report 10 (November 2018)  
Mighty Earth - Rapid Response Report 17 (July 2019)  
Mighty Earth - Rapid Response Report 23 (January 2020) | Resolved |
### Supplier Grievance Register

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<td>encroachment.</td>
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<tr>
<td>26</td>
<td>IOI</td>
<td>Reports of deforestation, peat clearing, illegal road construction, labour issues and land conflicts in the following operations: - IOI Pamol - IOI Pelita - PT Kalimantan Prima Agro Mandiri (PT KPAM)</td>
<td>Indirect via third party traders</td>
<td>SD Oils Pasir Gudang</td>
<td>IOI came into our supply chain via third party traders with relevant NDPE policies and we have been monitoring their engagement with IOI.</td>
<td>Local communities - RSPO complaint (March 2010) AidEnvironment - RSPO complaint (April 2015) Finnwatch - Working Conditions at the IOI Group's Oil Palm Estates in Malaysia report</td>
<td>Resolved</td>
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| 27 | Jhonlin Group | Reports of deforestation, peat clearing, land conflicts, labour issues and excessive use of force in the following operations:  
- PT Senabangun Aneka Pertiwi  
- PT Kurun | Direct purchases | SD Oils Pulau Laut  
SD Oils Rantau KCP  
SD Oils Bintulu | the RSPO Complaints Panel and subject to potential appeal through independent review by RSPO’s Board of Governors.  
- The complaint was officially closed on 8 Oct 2018.  
IOI is also actively reporting on its sustainability issues. Current updates on the progress is available at: [https://www.ioigroup.com/Content/S/S_Grievance_Update](https://www.ioigroup.com/Content/S/S_Grievance_Update) | Mighty Earth - Rapid Response Report 9 (October 2018)  
Mighty Earth - Rapid Response Report 11 (December 2018)  
Mighty Earth - Rapid Response Report 17 (July 2019) | No Longer in Supply Chain |
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| 28 | Kalimantan Sawit Kusuma Group | Reports of deforestation and peat clearing, in the following operations:  
- PT Fajar Saudara Lestari | Indirect via third party traders | Senabangun Aneka Pertiwi and PT Kurun Sumber Rezeki are also ongoing.  
Since June 2021, the Jhonlin Group are no longer in our supply chain.  
Kalimantan Sawit Kusuma came into our supply chain via third party traders with have relevant NDPE policies and procedures.  
Our third-party trader that engaged with Kalimantan Sawit Kusuma Group advised that the land clearing in question at Fajar Saudara Lestari (PT FSL) was caused by fire incidents trigged by extreme dry weather conditions in Indonesia. Fire outside PT FSL concession area has spread into their concession and cause the fire in PT FSL during the dry period.  
Kalimantan Sawit Kusuma is no longer in our supply chain since January 2021. | Mighty Earth - Rapid Response Report 22 (December 2019) | Resolved |
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<td>29</td>
<td>Kencana Agri Group</td>
<td>Potential deforestation in:</td>
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<td>- PT Agro Sawit Mas Lestari</td>
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<td>Indirect via third party traders</td>
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<td>SD Oils Zwijndrecht</td>
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<td><strong>Summary of Actions and Findings</strong></td>
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<td>Kencana Agri Group came into our supply chain via third party traders</td>
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<td>with relevant NDPE policies.</td>
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<td>The operation highlighted is not specifically in our supply chain,</td>
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<td>however other mills affiliated with the Kencana Agri Group are.</td>
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<td>Upon investigation, the clearing reported by Mighty Earth at PT</td>
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<td>Agro Sawit Mas Lestari was confirmed to be located outside of their</td>
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<td>operations.</td>
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<td>30</td>
<td>Kirana Megatara Group</td>
<td>Potential deforestation detected. Reports of land prepared for</td>
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<td>clearing (stacking lines) in PT Putra Katingan Pratama.</td>
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<td>Indirect via third party traders</td>
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<td>SD Oils Zwijndrecht</td>
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<td>SD Oils South Africa</td>
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<td><strong>Summary of Actions and Findings</strong></td>
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<td>Kirana Megatara mills are not in our supply chain. Our link to</td>
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<td>Kirana Megatara is via TAP mills in our supply chain. We also do</td>
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<td>not source directly from TAP, but via a third-party trader. ME</td>
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<td>alleges that TAP companies (PT Etam Bersama Lestari and PT Dwi</td>
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<td>Lestari Jaya) are sourcing from Kirana Megatara. Our third-party</td>
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<td>trader has investigated and confirmed with TAP that they are not</td>
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<td>sourcing from Kirana Megatara.</td>
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**Reported By:** Mighty Earth - Rapid Response Report 17 (July 2019)

**Case Status:** Resolved
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<tr>
<td>31</td>
<td>KLK Berhad</td>
<td>Reports of peat clearing in:</td>
<td>Indirect via third party traders</td>
<td>PT Menteng Jaya Sawit Perdana is not in our supply chain, however other KLK mills are. The clearing detected by Mighty Earth was in a Community Forest Plantation that was gazetted by the Indonesian authorities. This is an area that KLK has no control over. KLK's public response on this allegation is available on their website: <a href="https://www.klk.com.my/sustainability/market-place/grievance/">https://www.klk.com.my/sustainability/market-place/grievance/</a></td>
<td>Mighty Earth - Rapid Response Report 18 (Aug 2019)</td>
<td>Resolved</td>
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<td>33</td>
<td>Medco Group (new owner Capitol Group)</td>
<td>Reports of deforestation and land conflicts in PT Medco Papua Hijau Selaras.</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht</td>
<td>PT Medco Papua Hijau Selaras entered SD Oils supply chain via a third-party trader who have relevant NDPE policies. PT Medco Papua Hijau Selaras has been divested to another party called Capitol Group. Despite the divestment third-party has continued to engage with Medco Group. Third-party trader who engaged with Capitol Group informed that HCV/HCS has already been conducted by qualified assessor and finalised in February 2020. The company has clarified that their land clearing was guided by the outcome of the assessments. Field verification was earlier planned but only completed in June 2020 due to covid-19 restrictive movement order. Assessment report is in progress. Further investigation conducted by the third-party trader revealed that the land clearance was a result of pressure from the community to develop areas for plasma smallholders programme. Several field assessments have been conducted thereafter to determine the details or the affected areas and location. The full field details were finally completed in September 2020.</td>
<td>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</td>
</tr>
<tr>
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<tr>
<td>34</td>
<td>Musirawas / Asam Jawa Group</td>
<td>Reports of peat clearing in PT Sumur Pandanwangi Reports of deforestation</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>PT Sumur Pandanwangi is not specifically in our supply chain, however other mills affiliated with the Musirawas / Asam Jawa Group potentially are via third-party traders with relevant NDPE policies and commitments. We are investigating the allegation.</td>
<td>Mighty Earth - Rapid Response Report 6 (July 2018) Mighty Earth - Rapid Response</td>
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<td>35</td>
<td>Nurdin Tampubolon Corporation (NT Corp)</td>
<td>Reports of deforestation in PT Bintang Sakti Lenggana</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>PT Bintang Sakti Lenggana is not specifically in our supply chain. NT Corp came into our supply chain via a third-party trader with relevant NDPE policies. We have initiated engagement with them on this case. Third-party trader informed that preliminary investigation reveals that PT Bintang Sakti Lenggana is not under the management control of NT Corp. Following investigations, third-party trader confirmed that the area where clearing was detected, is not related to oil palm development.</td>
<td>Mighty Earth - Rapid Response Report 19 (Sep 2019)</td>
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| 36 | Peputra Group | Potential deforestation in:  
- PT Marita Makmur Jaya | Indirect via third party traders | SD Oils South Africa  
SD Oils Zwijndrecht | PT Marita Makmur Jaya is not specifically in our supply chain, however other potentially affiliated mills are. Peputra Group came into our supply chain via third party traders with relevant NDPE policies. We have initiated engagement with them on this case. They are currently investigating the links between PT Marita Makmur Jaya and the Peputra Group.  
Upon investigation, third-party trader informed that PT Marita Makmur Jaya is not under the management control of Peputra Group. | Mighty Earth - Rapid Response Report 12 (January 2019) | Resolved |
| 37 | Perbadanan Kemajuan Pertanian Negri Pahang (PKPP) (owner of LKPP Corporation Sdn Bhd) | Reports of deforestation in:  
PKPP Plantation Sdn Bhd (Cherating) | Indirect via third party traders | SD Oils Zwijndrecht  
SD Oils Langat  
SD Oils Pasir Gudang  
SD Oils Carey Island | - LKPP/PKPP came into our supply chain via 2 third party traders with relevant NDPE Policies.  
- However, both traders have confirmed that they have stopped purchases from LKPP/PKPP. | Mighty Rapid Response Report 31 (Nov 2020) | No Longer in Supply Chain |
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| 38 | Perkebunan Nusantara (PTPN) | Reports of deforestation in:  
- PT Perkebunan Nusantara II Prafi | Indirect via third party traders | SD Oils South Africa  
SD Oils Zwijndrecht | Mighty Earth Rapid Response Report 15 alleges 18ha of forests cleared by PT Perkebunan II Prafi in West Papua. This operation is not specifically in our supply chain. However, a potentially affiliated company, PT Perkebunan Nusantara XIII (Pelahari), is in our supply chain via a third-party trader. Trader has relevant NDPE policies.  
Third-party trader advised that the results from their engagement and investigation reveals that PT Perkebunan Nusantara II Prafi has been divested since 2014. | Mighty Earth - Rapid Response Report 15 (May 2019) | No Longer in Supply Chain |
| 39 | Pinehill Pacific Bhd | Reports of deforestation in:  
- PT Makmur Jaya Malindo | Direct purchases | SD Oils Pasir Gudang  
SD Oils Port Klang  
SD Oils Biodiesel | PT Makmur Jaya Malindo is not specifically in our supply chain, however a previously affiliated mill called Benta (Perak) Plantation is. Pinehill Pacific has since disposed Benta (Perak) Plantation mill in 3Q 2019. Therefore, Pinehill Pacific is no longer in Sime Darby Plantation's supply chain. | Mighty Earth - Rapid Response Report 18 (Aug 2019) | No Longer in Supply Chain |
| 40 | Prosper / Tee family | Reports of deforestation and land conflicts in Bewani Oil | Direct purchases and indirect via third party traders | SD Oils Biodiesel  
SD Oils Pasir Gudang | Bewani Oil Palm Plantations are not specifically in our supply chain, however other mills affiliated with Prosper/Tee family are.  
Third party traders have relevant NDPE policies and | Greenpeace - Final Countdown Report | Ongoing Monitoring & Engagement |
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<tr>
<td></td>
<td>Palm Plantations.</td>
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<td>we have initiated engagement with them on this case. It has been advised that the minority shareholder in the Prosper Group with shareholding in the Bewani Oil Palm Plantation has divested from the project. There are no longer any links between the Prosper Group and the Bewani Oil Palm Plantation.</td>
<td></td>
<td>(September 2018)</td>
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| 41 | PT Berlian Inti Mekar Rengat (BIMR) | Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks | Indirect via third party traders | SD Oils South Africa SD Oils Zwijndrecht | PT BIMR came into our supply chain via third party traders with relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:
- a verification report was conducted by CORE (Consortium of Resource Experts; ProForest and Daemeter) in 2016 and a time-bound action plan was developed.
- Eyes on the Forest's Enough is Enough 2018 report states that PT Berlian Inti Mekar Rengat has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2014. | Eyes on the Forest - Enough is Enough Report (June 2018) | Resolved |
| 42 | PT Delima Makmur      | Reports of community conflicts and links to PT Sisirau (suspended by the RSPO for clearing orangutan habitat). | Indirect via third party traders | SD Oils South Africa | PT Delima Makmur came into our supply chain via third party traders with relevant NDPE policies and procedures.
PT Delima Makmur is no longer in SDO's supply chain as our third-party trader has ceased sourcing from them. | Leuser Watch Website RAN - Community Struggles for Land Rights and Livelihoods in Singkil-Bengkung region Nov 2019 | No Longer in Supply Chain |
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<tr>
<td>43</td>
<td>PT Ensem Lestari</td>
<td>Reports of links to deforestation in the Leuser Ecosystem via 3rd party FFB</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>PT Ensem Lestari came into our supply chain via third party traders with relevant NDPE policies and procedures. Engagement by our third-party trader revealed that PT Ensem Lestari have been working on their traceability and NDPE action plan through their direct suppliers. There have not been any new reports of land clearing since the 2018 report.</td>
<td>Leuser Watch Website RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018</td>
<td>Resolved</td>
</tr>
<tr>
<td>44</td>
<td>PT Inti Indosawit Subur Ukui 1 and 2 (PT IISU 1 and 2)</td>
<td>Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht</td>
<td>PT Inti Indosawit Subur Ukui 1 &amp; 2 came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include: - PT Inti Indosawit Subur Ukui 1 &amp; 2 acknowledge that a third party trader had supplied FFB sourced from the area concerned and suspended the trader in May 2018. - They have improved the Traceability Master Database of their entire third party supply chain which enables them to monitor the source of incoming supplies. - Suppliers are also required to sign a statement that commits FFB suppliers to source only from legal areas</td>
<td>Eyes on the Forest - Enough is Enough Report (June 2018)</td>
<td>Resolved</td>
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<td></td>
<td>PT Makmur Andalan Sawit</td>
<td>Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht</td>
<td>PT Makmur Andalan Sawit came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include:</td>
<td>Eyes on the Forest - Enough is Enough Report (June 2018)</td>
<td>Resolved</td>
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</table>
| 45 | PT Makmur Andalan Sawit | Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks | Indirect via third party traders | SD Oils Zwijndrecht                              | - facilitating a verification visit by TFT, and agreement on an action plan in 2016.  
- agreement to participate in a traceability to plantation pilot project in 2017.  
- 100% traceability to plantation for supplies is expected to be achieved by end July 2019. This will allow them to demonstrate that supplies do not originate from Tesso Nilo and Bukit Tigapuluh national parks.  
Mas confirms no illegal FFB was received and monitoring is in place to block such FFB into their supply chain. They have joined WWF "HALT" programme and have since achieved 100% traceability to plantation. | Eyes on the Forest - Enough is Enough Report (June 2018) | Resolved         |
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<td>46</td>
<td>PT Mitra Unggul Pusaka Segati (MUPS)</td>
<td>Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht</td>
<td>Eyes on the Forest's Enough is Enough 2018 report states that PT Mitra Unggul Pusaka Segati has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2012.</td>
<td>Eyes on the Forest - Enough is Enough Report (June 2018)</td>
<td>Resolved</td>
</tr>
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<td>47</td>
<td>PT Nafasindo</td>
<td>Allegations of community conflicts</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>PT Nafasindo came into our supply chain via third party traders with relevant NDPE policies and procedures. Third-party trader informed that they have not been purchasing from PT Nafasindo since January 2020</td>
<td>Leuser Watch Website RAN - Community Struggles for Land Rights and Livelihoods in Singkil-Bengkung region November 2019</td>
<td>No Longer in Supply Chain</td>
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| 48 | PT Palma Serasih | Reports of deforestation in the following operation:  
- PT Global Primatama Mandiri (Area 2) | Direct purchases | SD Oils Pulau Laut | PT Global Primatama Mandiri is not specifically in our supply chain, however an affiliated mill of PT Palma Serasih is. The supply entered our supply chain via a spot purchase in end 2019/early 2020. They have not entered our supply chain since these spot purchases. | Mighty Earth - Rapid Response Report 13 (February 2019)  
| 49 | PT Peputra Supra Jaya (PSJ) | Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks | Indirect via third party traders | SD Oils Zwijndrecht  
SD Oils South Africa | PT PSJ came into our supply chain via third party traders with relevant NDPE policies and procedures. Key highlights include:  
- verification visit by third party suppliers in 2016.  
- it was verified that the fire stated in EOF’s report took place outside PSJ's concession. Despite this, PSJ agreed to enhance its fire prevention and management system.  
- agreed to a traceability to plantation pilot project at their mills in 2017.  
- PT Peputra Supra Jaya expected to achieve traceability to plantation for 100% of supplies by end July 2019. This will allow them to demonstrate that | Eyes on the Forest - Enough is Enough Report (June 2018) | Resolved |
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<td>50</td>
<td>PT Runding Putra Persada (PT RPP)</td>
<td>Reports of links to deforestation in the Leuser Ecosystem via 3rd party FFB</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>PT RPP came into our supply chain via third party traders with relevant NDPE policies and procedures. Third-party trader conducted a field visit to verify the FFB supply from Loat Bangko and confirmed that the FFB was not supplied to PT Runding Putra Persada during the 2018 deforestation period.</td>
<td>Leuser Watch Website RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018</td>
<td>Resolved</td>
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<td>51</td>
<td>PT Saraswanti Utama</td>
<td>Reports of deforestation and peat clearing in: - PT Saraswanti Agro Estate</td>
<td>Direct purchases</td>
<td>SD Oils Bintulu SD Oils Rantau KCP</td>
<td>PT Saraswanti Agro Estate is not specifically in our supply chain. However, other operations affiliated with the parent company, PT Saraswanti Utama, were in our supply chain via spot purchases. No further spot purchases from the Saraswanti Group have been made since February 2019.</td>
<td>Foresthints - Palm Oil News Post (February 2019)</td>
<td>No Longer in Supply Chain</td>
</tr>
<tr>
<td>52</td>
<td>PT Sawit Mas Nusantara (PT SMN)</td>
<td>Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht SD Oils South Africa</td>
<td>PT SMN came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include: - PT SMN has denied allegations of deforestation in national parks. - Upon investigation insufficient evidence was found to substantiate the allegations. - It was confirmed that PT SMN's sources of FFB does not include concessions indicated by Eyes on the Forest.  - 100% traceability to plantation for supplies is expected to be achieved by end July 2019. This will allow them to demonstrate that supplies do not originate from Tesso Nilo and Bukit Tigapuluh national parks. Update February 2020: - PT SMN have achieved 100% traceability to</td>
<td>Eyes on the Forest - Enough is Enough Report (June 2018)</td>
<td>Resolved</td>
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| 53 | PT Surya Panen Subur II | Reports of deforestation and peat clearing in the Leuser Ecosystem. | Indirect via third party traders | SD Oils South Africa | PT SPS II came into our supply chain via third party traders with relevant NDPE policies and procedures. Current updates on their progress include:  
- PT SPS II committed to a moratorium on peatland clearing in 2015 and have been implementing best management practices for peatland plantations.  
- Our third party trader's monitoring of PT SPS II's operations has identified pockets of land clearing in their concession, which has been due to community encroachment. PT SPS II themselves have continued to maintain a moratorium on the area.  
- To deal with the illegal encroachment, PT SPS II has reported the following actions:  
  1. Engagement with surroundings communities.  
  2. Reached out to Government Land Authority requesting for enforcement of PT SPS II's land use right.  
  3. Conducted land Tenure Study/Participatory mapping.  
  4. Filed police reports on the ongoing illegal encroachment.  
  5. Transparently reported the encroachment/illegal occupation issues to the Governor of Aceh. | Rainforest Action Network - Last Place on Earth Report (November 2014) | No Longer in Supply Chain |
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|    |               |        |                     |                                               | - On the 13th July 2018, officials from the Indonesia Ministry of Environment and Forestry (KLHK) conducted a field verification to SPS II, where the officials visited disputed area including area allegedly cleared by illegal encroachers.  
- On land conflicts, PT SPS II is working with TFT to seeking resolution with the local communities. A Collaboration For Transformation programme was launched in 2017 to address the land tenure issues between PT SPS II and the local communities.  
- On the use of fire for land clearing, there have been a few mistakes:  
  1. In 2016, PT SPS II were found not guilty by the Indonesian High Court for the allegation of use of fire for land clearing.  
- Third party trader continues to support the progress made by PT SPS II but has decided to stop purchasing from them in June 2018. No longer in our supply chain. |            |            |
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<td>55</td>
<td>Rimbunan Hijau</td>
<td>Reports of deforestation and peat clearing in operations in Papua New Guinea and Sarawak, including:</td>
<td>Indirect via third party traders</td>
<td>SD Oils Bintulu direct purchases - no direct purchase from RH after 1Q 2019</td>
<td>Gilford Ltd, Rimbunan Hijau's operation in Papua New Guinea is not specifically in our supply chain. However, other affiliated mills from Rimbunan Hijau's Malaysian operations are. Third party traders have relevant NDPE policies and we are initiating engagement with them on this case. Current report on progress includes:</td>
<td>Greenpeace - Final Countdown Report (September 2018) Mighty Earth - Rapid Response</td>
<td>Resolved</td>
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<td></td>
<td>- Erajaya Synergy Sdn Bhd</td>
<td>SD Oils South Africa</td>
<td>SD Oils Zwijndrecht</td>
<td>- engagement with Rimbunan Hijau initiated in September 2018.</td>
<td>Investigating cases in Sarawak, Malaysia that were highlighted by Mighty Earth in their Rapid Response Reports.</td>
<td>Report 12 (January 2019)</td>
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<td></td>
<td>- Jaya Tiasa, LPF/0024</td>
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<td>- Gilford Ltd, Rimbunan Hijau's operations in Papua New Guinea, committed to adhering to an NDPE policy and shared relevant information for further investigation.</td>
<td>February 3, 2020 - Third-party trader’s investigation and engagement with Rimbunan Hijau reveals the following updates:</td>
<td>Mighty Earth - Rapid Response Report 17 (July 2019)</td>
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<td>- Poh Zhen Sdn Bhd</td>
<td>SD Oils South Africa</td>
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<td>- third party trader in the process of analysing the information provided and may verify with a field visit.</td>
<td>• Erajaya Synergy Sdn Bhd - Land clearing was reported in several areas based on the RRR 18. While a small portion was cleared for non-palm planting related operation, most of the area was illegally cleared by local communities.</td>
<td>Mighty Earth - Rapid Response Report 18 (Aug 2019)</td>
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<td>- Rimbunan Sawit, RH Plantation (Selangor Estate), RHPOM</td>
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<td>- moratorium on further clearing is in place while engagement is ongoing.</td>
<td>• Jaya Tiasa Holdings Berhad - The land clearing is not related to oil palm development.</td>
<td>Mighty Earth - Rapid Response Report 19 (Sep 2019)</td>
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<td>- Woodijaya Sdn Bhd</td>
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<td>• Poh Zhen Sdn Bhd - the reported land clearing is not</td>
<td>Mighty Earth - Rapid Response Report 21 (Nov 2019)</td>
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<td>- Timrest Sdn Bhd</td>
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<td>- PJP Pelita Lundu Plantation Sdn Bhd mill</td>
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<td>related to oil palm development.</td>
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<td>• Simunjan Estate - Land clearing was not done by the company, it was illegal encroachment by surrounding communities.</td>
<td>Report 29 (July 2020)</td>
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<td>• RH Plantation (Selangor Estate) - The land clearing is not related to oil palm development.</td>
<td>Mighty Earth - Rapid Response Report 34 (June 2021)</td>
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<td>• Woodijaya Sdn Bhd - The area in question is an NCR land, where the 4ha clearance was done by communities for the planting of pineapple.</td>
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<td>• Timrest Sdn Bhd - Land clearing was not conducted by the company, it happened outside their concession boundary.</td>
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<td>• PJP Pelita Lundu Plantation Sdn Bhd mill - The alleged clearing on Lot N17 was not carried out by the company. This particular area (LOT N17) is still owned by the local smallholders as it has not been surrendered yet. The land clearing is reported to be done by local smallholders.</td>
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<td>• Poh Zhen - The alleged clearing at Poh Zhen has been verified to be not related to oil palm.</td>
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<td><strong>LPF 0026</strong> - Our third-party trader has verified this allegation and confirmed that the land clearing is not related to oil palm development.</td>
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<td>56</td>
<td>Salim Group</td>
<td>Reports of deforestation, peat clearance and land conflicts in the following operations: - PT Anekareksa International - PT Bintuni Agro Prima Perkasa (PT BAPP) - PT Cahaya Agro Pratama (PT CAP) - PT Duta Rendra Mulya (PT DRM) - PT Menara Wasior - PT Rimbun</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht SD Oils South Africa</td>
<td>The Salim Group were historically in the supply chain of our Sime Darby Hudson &amp; Knight refinery via a third-party trader who stopped buying from them in 2017. The Salim Group re-entered our supply chain in 1Q 2018 via two spot purchases from different third-party traders. This time in the supply chain of our Sime Darby Unimills refinery. These third-party traders have NDPE policies in place and the Salim Group has not entered our supply chain since these spot purchases.</td>
<td>Mighty Earth - Rapid Response Report 1 (November 2017) Greenpeace - Deforestation Case Studies (December 2017) Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018) Rainforest Action Network - Salim Report (April 2018) Mighty Earth - Rapid Response</td>
<td>No Longer in Supply Chain</td>
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<td>57</td>
<td>Samling / Glenealy Plantations</td>
<td>Reports of deforestation in Myanmar Stark Prestige Plantation (MSPP), operations in Sarawak, Malaysia and in North Kalimantan, Direct purchases and indirect via third party traders</td>
<td>SD Oils Bintulu SD Oils Carey Island KCP SD Oils Zwijndrecht</td>
<td>Myanmar Stark Prestige Plantation specifically is not in our supply chain, however other mills affiliated with Samling / Glenealy Plantations are. Current updates on progress of their engagement with Samling / Glenealy include: - they are not sourcing from their operations in Papua New Guinea or Myanmar. Supplies come from operations in Malaysia. - moratorium on new developments agreed to, pending relevant HCV and HCS assessments. - Dec 2017 MSPP commissioned Montrose Environmental which is also a registered assessor to</td>
<td>Greenpeace - Deforestation Case Studies (December 2017) Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary</td>
<td>No Longer in Supply Chain</td>
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<td>Indonesia.</td>
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<td>carry out a HCV study and they are licensed to do so in Myanmar.</td>
<td>(May 2018)</td>
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<td></td>
<td>- Tunas</td>
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<td>- HCV report’s recommendation was adhered to by MSPP until the asset was disposed towards the end 2018/early 2019 by the Group.</td>
<td>Greenpeace - Final Countdown Report (September 2018)</td>
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<td>Borneo Plantations</td>
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<td>Updates on deforestation in Kalimantan:</td>
<td>Mighty Earth - Rapid Response Report 11 (December 2018)</td>
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<td></td>
<td>- Syarikat</td>
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<td>- Reports of deforestation in Kalimantan, Indonesia by PT Tunas Borneo Plantation, is not associated with the Samling Group. The area highlighted is outside of the Samling Groups concession. Based on the information and photos evidence, the area is currently occupied by local communities which has conducted the land clearing. It was also noted that substantial land clearing was conducted by a mining company operating in the area.</td>
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<td>Samling</td>
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<td>Updates on deforestation in Sarawak:</td>
<td>Mighty Earth - Rapid Response Report 13 (March 2019)</td>
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<td>Timber Sdn</td>
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<td>- Syarikat Samling Timber Sdn Bhd (LPF 0014) as highlighted by Mighty Earth's rapid response report 17 is for Industrial Tree Planting and that they have no oil palm estate in the stated location.</td>
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<td>- Samling Lana LPF 0006 and LPF 008 Marudi &amp; Batu Belah as highlighted in Mighty Earth's rapid response reports 11, 13, 15, 16, and 17 were not related to oil palm plantations. Clearing detected were related to</td>
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<td>the harvesting of tree plantation species.</td>
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<td>- On reports of deforestation in Jelalong LPF 0007 concession, below are the findings:</td>
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<td>• Samling Jelalong LPF 0007 Part 1 - Encroachment by communities and made police report made.</td>
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<td>• Samling Jelalong LPF 0007 Part 2 - photo evidences show the same area was again encroached by communities around Long Tisam. This was investigated and police report lodged.</td>
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<td>• Samling Jelalong LPF 0007 Part 3 - The deforested area is outside of Samling’s concession.</td>
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<td>• On the land clearing highlighted in Mighty Earth Report 24, direct engagement with Samling Group clarified that Marudi LPF is a reforestation area and no oil palm has been planted or will be planted within the LPF.</td>
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<td>• Marudi LPF is certified under the Malaysian Timber Certification Scheme.</td>
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<td>• Within the area identified in ME Report 24, there are areas planted with rubber which is a project sponsored by the Government under RISDA for Long Panai local community. Other areas are for Reforestation under our Group’s Licensed Planted Forest (LPF) area.</td>
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<td>• Glenealy Plantations are amenable to having an</td>
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| 58 | Shin Yang Group / Sarawak Oil Palm | Reports of deforestation / peat clearing in operations in Sarawak, Malaysia and the following operations:   - Dataran Linau Sdn Bhd   - Shin Yang OP Planting Area | Indirect via third party traders | SD Oils Zwijndrecht | NDPE policy of which they are working with a consultant on this.   - Glenealy Plantations have agreed to disclose their oil palm boundary maps provided an NDA from SD Oils is in place.   Due to specific requests by key customers to remove Glenealy Plantation mills from their supply chains, there will be no further purchases from Samling after April 2020, until concerns can be resolved.   

The highlighted mills are not specifically in our supply chain, however other mills affiliated with Shin Yang Group/SOP are. Third party traders have relevant NDPE policies and commitments. Current updates from their engagement with Sarawak Oil Palm (SOP) include:   - Acknowledgement that SOP had non-compliances in their operations between 2016 - 2017.   - In 2018, SOP expressed commitment to NDPE and third party traders have been supporting them in their journey towards implementing a holistic action plan across their supply chain, which in phases will also look into their third party sourcing.   - Priority is to ensure new clearings comply with NDPE commitments. |

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<tr>
<td>59</td>
<td>Sime Darby Plantation Bhd</td>
<td>Alleged occurrence of deforestation within Sime Darby Plantation’s (SDP) boundary at Sime Darby Plantation Bhd (Derawan, SOU 33) in Bintulu, Sarawak</td>
<td>Buying Relationship</td>
<td>Pursuant to the report, our desktop verification on the coordinates (3.353, 113.39) showed that it falls outside of SDP’s operational area; approximately 100 meters away from our Rajawali Estate boundary. This was followed by an on-site verification which further confirmed that the deforested area mentioned in the report directed to a neighbouring third party local agricultural company. Full press statement response as follow: <a href="http://www.simedarbyplantation.com/media/press-releases/statement-response-rapid-response-palm-oil-report-19-mighty-earth">http://www.simedarbyplantation.com/media/press-releases/statement-response-rapid-response-palm-oil-report-19-mighty-earth</a></td>
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<td>Mighty Earth - Rapid Response Report #19 (September 2019)</td>
<td>Resolved</td>
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23 December 2019: The RSPO has now published the boundaries of Sime Darby’s concessions in Sarawak, which includes Derawan SOU 33 area. Following further engagement with Mighty Earth regarding the issue of the concession boundary, this matter has been resolved to Mighty Earth’s satisfaction.
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<td>60</td>
<td>Sime Darby Plantation Bhd</td>
<td>Complaints of social issues levelled against PT Mitra Austral Sejahtera II (PT MAS II) by Project Affected Community (PAC)</td>
<td></td>
<td>On-going complaint is captured in RSPO Complaints Panel. Updates can be found in this link <a href="https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/">https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/</a>&lt;br&gt;As of 25 June 2019, PT MAS has ceased to be a subsidiary of Sime Darby Plantation as we have effectively disposed our interest in the company to PT Inti Nusa Sejahtera.</td>
<td>RSPO Complaints Panel (31 Oct 2012)</td>
<td>Ongoing Monitoring &amp; Engagement</td>
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<td>61</td>
<td>Sin Tek Huat (STH Group)</td>
<td>Report of deforestation in: - PT Makmur Bersama Asia (PT MBA)</td>
<td>Indirect via third party traders</td>
<td>PT MBA is not specifically in our supply chain, however other mills affiliated with STH Group are. Supplies from STH Group are via third party traders who have NDPE policies and commitments. Engaging with third party trader on this case.&lt;br&gt;Results of third-party trader’s engagement with STH Group concluded that the reported deforestation is outside PT Makmur Bersama Asia concession boundary.</td>
<td>Mighty Rapid Response Report #20 (Oct 2019)</td>
<td>Resolved</td>
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<td>62</td>
<td>SIPEF</td>
<td>Reports of deforestation in: PT Agro Muara Rupit</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht SD Oils Liverpool</td>
<td>PT Agro Muara Rupit is not specifically in our supply chain, however other mills affiliated with SIPEF are. Supplies from SIPEF came into our supply chain via third party traders who have NDPE policies and commitments. SIPEF responded to the allegation (<a href="https://bit.ly/3o3gQ06">https://bit.ly/3o3gQ06</a>), stating that the development detected by Mighty Earth has not undergone an Integrated HCV-HCS Assessment given it relates to a NPP of 2014 and it was not required at the time. A Land Use Risk Identification (LURI) was conducted by an independent assessor and accepted by the RSPO in April 2020. The LURI shows that all of the clearings identified by Mighty Earth are wholly within the area identified as “Low Risk”. SIPEF notes that from the evidence provided, none of the reported cleared areas overlap with either the HCV or any of the HCS areas. SIPEF also informed our third-party trader that the area cleared is covered by rubber vegetation. Status of the PT AMR peer review (area I &amp; II) has been completed and the result is already available publicly at the HCSA website. See <a href="https://bit.ly/3IGld1A">https://bit.ly/3IGld1A</a></td>
<td>Mighty Rapid Response Report 32 (Jan 2021)</td>
<td>Resolved</td>
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| 63 | Ta Ann / Sarawak Plantation Berhad | Reports of deforestation in:  
- Ladang Selezu Sdn Bhd  
Reports of violence in:  
- Niah Palm Oil Mill | Indirect via third party traders | SD Oils Zwijndrecht  
SD Oils South Africa | Ladang Selezu is not specifically in our supply chain, however other Ta Ann mills are.  
Third party suppliers have relevant NDPE policies and programmes. Updates on their engagement with Ta Ann include:  
- commitment to adhere to NDPE policy obtained and concession maps shared for investigation.  
- Moratorium on clearing achieved.  
- Field verification scheduled for July 2019.  
As part of the investigation, third-party trader's team has conducted a field assessment from 22-27 July to verify the allegation. The field assessment has verified that the deforestation happened outside Ladang Selezu’s concession boundaries.  
**Niah Palm Oil Mill:**  
The incident occurred on 7 February 2021, involving, Neileson Digat Anak Regi, a former employee of Niah Palm Oil Mill (NPOM), Sarawak Plantation Berhad (SPB).  
Neilson is alleged to have entered staff quarters on 7 February 2021 after a verbal confrontation and | Mighty Earth - Rapid Response Report 15 (May 2019) | Ongoing Monitoring & Engagement |
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<td>despite being informed that no visitors were allowed on the premises due to COVID-19 lockdown. He was asked to leave by the company staff but is alleged to have physically assaulted a guard and engaged in a fight on his way out. Nieleson was handed over to the police station and a report was filed against him. On the same day, he also lodged a police report claiming that he was beaten without reason, resulting in bodily pain. Following this incident, local community members and Nieleson’s grandfather imprisoned and beat up company security guards at the main entrance of a SPB estate on 9 February 2021. The said guards proceeded to lodge a police report on 10 February. The police department, Polis Diraja Malaysia (PDRM) has issued a media release on the case. PDRM has also made several arrests and the cases are still under investigation. As part of efforts to prevent similar incidents from happening, our third-party supplier will be assisting SPB with the development of relevant policies, in demonstrating a commitment to non-violence.</td>
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<td>64</td>
<td>Teladan Prima</td>
<td>Reports of deforestation in:</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>Supplies from Teladan Prima came into our supply chain via third party traders who have NDPE policies and commitments. Engagement with Teladan Prima revealed that the alleged land clearing is not conducted by the company and happened outside their concession boundary. This has been verified from their concession maps.</td>
<td>Mighty Earth - Rapid Response Report 26 (April 2020)</td>
<td>Resolved</td>
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<td>- PT Tanjung Buyu Perkasa</td>
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<td>65</td>
<td>TH Plantations</td>
<td>Reports of deforestation and peat clearing in:</td>
<td>Direct purchases and indirect via third party traders</td>
<td>SD Oils Bintulu SD Oils Carey Island KCP SD Oils Zwijndrecht SD Oils Pasir Gudang</td>
<td>The highlighted operations are not specifically in our supply chain, however other mills affiliated with TH Plantations are. Current updates include: - Moratorium on land clearing at PT Persada Kencana Prima (PT PKP) is in place. Agreement for HCV and HCS assessments before any development. - Advised on the presence of a logging company in the area with an overlapping claim on the concession (Hak Izin Lokasi), who have been responsible for most of the clearing (September 2017 - February 2018). - On the report issued by Chain Reaction Research dated 27th July 2018 alleging breach of moratorium in PT PKP, TH Plantations have clarified that activities were related to stacking work in areas previously cleared and overgrown. The restacking works were put on hold until this issue was clarified with stakeholders. This includes a field investigation by third party</td>
<td>Greenpeace - Deforestation Case Studies (December 2017) Chain Reaction Research Report (July 2018) Mighty Earth - Rapid Response Report 14 (April 2019) Mighty Earth - Rapid Response</td>
<td>Ongoing Monitoring &amp; Engagement</td>
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|    | Bhd - Mukim Tembeling (Yong Forest Reserve) Jerantut, Pahang | | | | suppliers.  
- PT PKP hired an independent assessor to conduct assessment of the area of contention, together with third party supplier’s team. The field assessment included mapping of the target area. A proposed rehabilitation plan will be established if new land was cleared. The field assessment was carried out between 15 and 19 October 2018.  
- Monthly monitoring indicates that PT PKP continues to uphold their commitment to a moratorium.  
- Mighty Earth Rapid Response Reports 14 and 15 allege deforestation and peat clearing in two TH Plantation operations in Sarawak, Malaysia. Upon engagement, it was determined with documentary evidence that the clearing detected occurred outside of Hydroflow’s concession boundary.  
- Mighty Earth Rapid Response Report 18 alleges peat clearing by TH Pelita Meludam in Sarawak. Engagement with TH Plantation revealed with map evidence indicates that the clearing occurred outside of their operations.  
- TH Plantation confirmed that land clearing at PT PKP had stopped since June 2019.  
- Ladang Tabung Haji is not specifically in our supply chain but a few affiliated mills are. The GPS |
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<td>coordinates for Ladang Tabung Haji pointed to a Ladang Sebauh an estate under the stable of Ladang Sawit Bintulu Sdn. Bhd., a joint venture company between TH Plantation and a local based company. TH Plantations confirmed that Ladang Sebauh has been disposed to a third party since 2008 and therefore no longer part of TH Plantations. TH Plantation has confirmed that clearing activity covering 6 ha is outside TH Pelita Simunjan concession. <strong>Mukim Tembeling (Yong Forest Reserve)</strong> - In our engagement with THP, it was clarified that the company which owns the land which was cleared is <strong>Deru Semangat Sdn Bhd (DSSB)</strong>, a joint venture company between Lembaga Tabung Haji and a member of the Pahang Royal family. Lembaga Tabung Haji (LTH) owns 55% in DSSB whilst THP does not own any shares in DSSB. THP merely acts as a management agent and does not have management control over the operation of DSSB. THP has conveyed its decision to terminate the Management Agreement to DSSB in 2019 and is in the process of finalising the termination of their Management Agreement with DSSB. Meanwhile THP have ceased all oil palm development in DSSB.</td>
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THP has terminated the management agreement with DSSB, effective from 15th January 2021. THP is working with another third-party supplier to finalize THP Group’s total liability area. The third-party supplier is also assisting THP in developing a recovery plan. Their first discussion took place on 26th February 2021.

No further direct purchases from TH Plantation have been made since October 2020. However, TH Plantations still enters our supply chin indirectly via spot purchases.

TH Plantation has committed to a NDPE policy which has been uploaded on their website [http://www.thplantations.my/doc/THP_Sustainability%20Policy_v2.pdf](http://www.thplantations.my/doc/THP_Sustainability%20Policy_v2.pdf)

Third party traders have relevant NDPE commitments and programmes. Maps of the concession has been shared with third party traders for investigation. Identified clearing was found to be outside of the Tradewinds concession.

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| 66 | Tradewinds     | Potential deforestation detected by Trans Kenyalang Sdn Bhd, in Sarawak, Malaysia. | Indirect via third party traders | SD Oils Bintulu  
SD Oils Port Klang  
SD Oils Biodiesel | Third party traders have relevant NDPE commitments and programmes. Maps of the concession has been shared with third party traders for investigation. Identified clearing was found to be outside of the Tradewinds concession. | Mighty Earth - Rapid Response Report 18 (Aug 2019) | Resolved |
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| 67 | Triputra Agro Persada Group | Reports of deforestation in:  
- PT Dwiwira Lestari Jaya  
- PT Brahma Binabakti | Indirect via third party traders | SD Oils Carey Island  
KCP  
SD Oils Pasir Gudang  
SD Oils South Africa  
SD Oils Zwijndrecht | Triputra Agro Persada is indirectly in our supply chain via third party traders with relevant NDPE policies and commitments.  
**PT Dwiwira Lestari Jaya**  
HCV and HCS assessments conducted at PT Dwiwira Lestari Jaya in 2014 and 2016, show that the 56ha area highlighted in the Mighty Earth Rapid Response Report #12, was not located within their concession.  
**PT Brahma Binabakti**  
Our third-party trader has verified this allegation and confirmed that the land clearing happened outside of PT Brahma Binabakti’s concession boundary. For more | Mighty Earth - Rapid Response Report 12 (January 2019)  
Mighty Earth - Rapid Response Report 34 (June 2021) | Resolved |
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<td>68</td>
<td>TSH Resources Bhd</td>
<td>Reports of deforestation in PT Bulungan Citra Agro Persada.</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa SD Oils Zwijndrecht</td>
<td>PT Bulungan Citra Agro Persada is not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from TSH Resources Bhd are predominantly via a third-party trader who have NDPE policies and commitments. TSH has commissioned Malaysian Environmental Consultants (MEC) to verify the allegation. It was concluded that the land use change was caused by fire spread into the concession from neighbouring area. As a RSPO member, TSH strictly adheres to no burn policy, and do not use fire for their land clearing activities.</td>
<td>Mighty Rapid Response Report 21 (Nov 2019)</td>
<td>Resolved</td>
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<td>69</td>
<td>Union Sampoerna Triputra Persada</td>
<td>Reports of deforestation in PT Harapan Hibrida Kalbar</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht</td>
<td>Supplies from Union Sampoerna Triputra Persada came into our supply chain via third party traders who have NDPE policies and commitments. Engagements with Union Sampoerna Triputra Persada clarified that the clearing detected was outside of PT Harapan Hibrida Kalbar concession.</td>
<td>Mighty Earth - Rapid Response Report 23 (January 2020)</td>
<td>Resolved</td>
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<td>70</td>
<td>Widya Corporation</td>
<td>Reports of deforestation in PT Mulia Inti Perkasa</td>
<td>Indirect via third party traders</td>
<td>SD Oils South Africa</td>
<td>PT Mulia Inti Perkasa is not specifically in our supply chain, however a mill affiliated to its parent company is. The supplies from Widya Corporation are via a third-party trader who have NDPE policies and commitments. We have started engagements to investigate the allegations. Third-party trader who engaged with MIP updated that MIP has conducted the necessary assessments which include HCS and HCV. The area identified in the report is outside the HCV/HCS area. MIP has agreed to submit their HCS report for peer review. They are in the process of discussing with their assessor to comply the same. Third-party trader confirmed that concession maps have been shared with them for verification that clearing detected is outside boundaries. It is also reported that MIP has ceased their land clearing activities.</td>
<td>Mighty Earth - Rapid Response Report 25 (March 2020) Mighty Earth - Rapid Response Report 29 (July 2020)</td>
<td>No Longer in Supply Chain</td>
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<td>72</td>
<td>Woodman Group</td>
<td>Reports of deforestation and peat clearing in Sarawak, Malaysia -- - (Baram estate, part of LPF/0004) - Adong and Liku estates (part of LPF 0004)</td>
<td>Direct purchases and indirect via third party traders</td>
<td>SD Oils Bintulu SD Oils Zwijndrecht SD Oils South Africa</td>
<td>Supplies from Woodman Group came into our supply chain via third party traders who have NDPE policies and commitments. Engagements with Woodman Group clarified that the clearing detected in the Baram, Adong and Liku concessions are not related to oil palm development.</td>
<td>Mighty Earth - Rapid Response Report 18 (Aug 2019)</td>
<td>Resolved</td>
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| 73 | WTK           | Reports of deforestation and peat clearing by Southwind Plantation, in Sarawak, Malaysia. | Indirect via third party traders | SD Oils Zwijndrecht SD Oils South Africa | Supplies from WTK came into our supply chain via third party traders who have NDPE policies and commitments. Engagement initiated on clearing detected in Rapid Response Report 17. Updates include:  
- Third-party trader who engaged with WTK concluded that WTK is not involved in the land clearing.  
- The land clearing happened either outside their concession boundary or within "Native Dispute Land".  
- A Police report has been lodged by WTK on the illegal clearing within the "Native Dispute Land” inside their boundary. | Mighty Earth - Rapid Response Report 17 (July 2019) | Resolved |
| 74 | Yayasan Pahang (YP) | Reports of peat clearing and stacking lines in the YP Plantation Sdn Bhd concession in Bebar, Pahang, Malaysia. | Indirect via third party traders | SD Oils Pasir Gudang SD Oils Biodiesel SD Oils Langat SD Oils Carey Island | Supplies from Yayasan Pahang came into our supply chain indirectly via a third-party trader with relevant NDPE policies and commitments.  
From our engagement with YP Plantation, YP Plantation is committed to sustainable production of oil palm. The Board of YP Plantation Sdn Bhd had on 17th August 2020 issued a stop work order and at the same time approved the implementation of a Group-wide NDPE policy.  
YP formally appointed the Global Environment Centre (GEC) in January 2021 to assist them in implementing | Mighty Earth - Rapid Response Report 30 (August 2020) | Ongoing Monitoring & Engagement |
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| 75 | Yayasan Pelajaran Johor (Johor State Government) | Reports of deforestation in the YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara) concession, in Johor, Malaysia. | Indirect via third party traders | SD Oils Pasir Gudang  
SD Oils Zwijndrecht  
SD Oils Carey Island  
SD Oils Langat | Supplies from YPJ Plantations came into our supply chain via third party traders with relevant NDDPE policies and commitments.  
Our third-party trader that engaged with YPJ Plantations have verified this case and updated the following:  
- The total concession area of Sungai Ara is less than 90ha, whereby the entire concession was largely cleared prior to 2019. The remaining area of less than 5 ha which was developed in January 2019 is a combination of mixed scrub with pioneer species.  
- There was no further land clearing in Sungai Ara post January 2019. | Reported By: Mighty Earth - Rapid Response Report 32 (January 2021) | Case Status: Resolved |
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<td>Since the case was brought to YPJ's attention in January 2020, they have immediately developed an NDPE policy to guide future developments and demonstrate their commitment towards no deforestation. We will continue to monitor the progress at YPJ Plantation.</td>
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<td>76</td>
<td>Yuwang</td>
<td>Reports of deforestation and peat clearing by Empresa Sdn Bhd, in Sarawak, Malaysia.</td>
<td>Indirect via third party traders</td>
<td>SD Oils Zwijndrecht, SD Oils South Africa, SD Oils Carey Island</td>
<td>Supplies from Yuwang came into our supply chain via third party traders who have NDPE policies and commitments. Engagements with Yuwang clarified that the clearing detected was outside of their concession.</td>
<td>Mighty Earth - Rapid Response Report 17 (July 2019)</td>
<td>Resolved</td>
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