

Olam Grievance Monitoring Log

Updated as of 3rd July 2019

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ABBREVIATIONS

Bunge LC	Bunge Lorders Croklaan
CP	Complaints Panel
CRR	Chain Reaction Report
FGV	Felda Global Ventures
GP	Greenpeace
HCSA	High Carbon Stock Approach

IOI LC	IOI Lords Croklaan
MB	RSPO Mass Balance Oil
ME	Mighty Earth
RSPO	Roundtable on Sustainable Palm Oil
SD	Sime Darby
SG	RSPO Segregated Oil
SOP	Sarawak Oil Palm

DEFINITION:

Direct Supplier : Companies who directly supply or trade with Olam

Indirect Supplier: Companies who supply directly and/or indirectly to our direct suppliers

OLAM OPERATIONS

No	Date Filed	Issues	Source	Action Taken, Outcome	Status
1	30 th Oct 2018	<p>Strikes called by self-elected workers' representative from Mouila and key issues raised including:</p> <ol style="list-style-type: none"> 1. Non-renewal of temporary contract workers. 2. Employment of foreign workers 3. Additional demands on top of the Collective Agreements made in Feb 2017 	Self-reported	<p>11 April 2019 Discussion with workers' representative from Mouila was conducted on 28 Nov 2018. All additional demands were discussed, and minutes were recorded and signed for, and communicated with all workers through their representatives and with the Labour Department. Every month, we hold a meeting with our worker representatives as well as representative(s) from the Labour Department to update on the status and progress of the agreed action items. Last meeting was conducted on 28 Mar 2019.</p> <p>Summary of the sequence of the event as below:</p> <ol style="list-style-type: none"> 1. OPG began discussion on 29th September with employee representatives 2. Constructive discussions resulted in some issues being immediately resolved, with further discussions planned on the remaining points 3. Following the release of the mid-point update: <ol style="list-style-type: none"> a. The on-going discussion were halted by some employees who sought to change their representation b. Strikes on 14th Oct. 	Monitoring implementation of action plan

No	Date Filed	Issues	Source	Action Taken, Outcome	Status
		.		<ol style="list-style-type: none"> 4. During the strike, a small group of employees and non-employees came unto the property threatened our staff and damaged equipment and property at the Mouila mill, offices and plantations. one foreign worker was assaulted. 5. In order to protect the majority of the employees who wished to work as usual and prevent further incidents Olam enlisted the help of police to secure the premise. 6. Monitoring of agreed actions are ongoing. <p>Full statement available here</p>	

OLAM'S DIRECT SUPPLIERS

Date		Direct Supplier	Issues	Source	Action Taken & Outcome	Status
1	24 June 2019	PT BEST	<p>Potential deforestation seen through GFW GLAD alerts</p> <p>The GLAD alerts for Indonesia were screened using the Indonesia Ministry of Forestry and the Environment land cover dataset for 2017 which classifies existing palm oil plantations and primary and secondary forest with only alerts for clearance in primary and secondary forest analysed</p>	Mighty Earth Rapid Response 16	<p>24th June 2019 We have written to PT BEST and have asked them for a response on this. We are following this closely as PT BEST is also no longer an RSPO member.</p> <p>We have no new contracts with PT BEST</p>	Engaging
2	17 th May 2017	Felda Global Ventures (FGV)	<p>A series of reports from Chain Reaction Research and Greenpeace, plus a case investigated by RSPO.</p> <p>Allegations:</p> <ul style="list-style-type: none"> • FGV in Kalimantan's concession had cleared 1600 Ha peat forest. • On the 26th of July 2015, WSJ ran an article by Syed Zain Al – Mahmood alleging that Felda has breached labour conditions in its plantations. The allegations are: <ul style="list-style-type: none"> ○ That forced labour is being used ○ The workers are not paid minimum wages. ○ That their health and working conditions are neglected and 	<p>Mighty Earth Rapid Response 9</p> <p>Sept 2018: Greenpeace Final Countdown</p> <p>Mar 2018: Greenpeace's Report "Moment of Truth"</p> <p>Chain Reaction Research (Jan 2018, May 2017)</p> <p>RSPO Case Tracker (FGV)</p> <p>July 2017: WSJ - Palm-Oil Migrant</p>	<p>Olam has formally met with FGV to discuss the allegations and is monitoring implementation of their action plan.</p> <p>8 April 2018 The RSPO's Complaints panel decision letter is in process</p> <p>28 Nov 2018</p> <ul style="list-style-type: none"> • RSPO Complaints Panel released the findings from its investigation as well as independent verification done here • In summary: <ul style="list-style-type: none"> ○ FGV had by written agreements outsourced its foreign workers to FGV contractors in violation of Malaysian law and may be considered as acts done in furtherance of trafficked persons ○ FGV recruitment and employment process needs further improvement as indicators of forced labour are present (includes contract substitution, freedom to contract and resign, passport retention, workers freedom of movement, working and living conditions) <p>FGV has responded in a statement - here</p> <p>28th Sept 2018</p>	Monitoring implementation of action plan

Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
		<ul style="list-style-type: none"> ○ Their employers withheld their passports. 	<p>Workers Tell of Abuses on Malaysian Plantations</p> <p>July 2015: RAN - Joint NGO Statement: Modern Day Slavery Found on RSPO Member Felda Global Venture's Plantations</p>	<p>FGV has provided us the following update which is available here</p> <ul style="list-style-type: none"> • 17 mills have been RSPO certified as of 31st Aug • FGV Kalimantan: The Ministry (Kementerian Lingkungan Hidup dan Kehutanan) has required the following <ul style="list-style-type: none"> ○ Restore the peat hydrological function by maintaining ground water ○ Present planting will be maintained for at least 1 cycle. No new planting is allowed ○ All the manual and automatic water level monitoring points and canal blocks have been constructed and aligned according to the advice from KLHK. The water levels are monitored and reported to the ministry • Local Community Conflict with PT TAA and PT CNP <ul style="list-style-type: none"> ○ Ongoing engagement after the local community sent a letter to the RSPO requesting to continue the Plasma Development • High Carbon Stock Assessment in APL <ul style="list-style-type: none"> • HCS assessment completed using Toolkit v2. <p>17th May 2018 FGV CEO sent a letter affirming its sustainability commitment and shared the following updates:</p> <ul style="list-style-type: none"> • 13 POMs RSPO certified • Commitment to restore all developed peat lands and forest areas • Workers welfare <p>9th April 2018 FGV announces its enhancement of its sustainability commitments as follows:</p> <ul style="list-style-type: none"> • HCSA: Adopted the HCSA in current areas of potential development. Have already incorporated this approach in their investment screening process for all future land acquisitions • Peat: To restore all its developed peat lands in line with our 2017 Sustainability Policy, without causing social conflict <ul style="list-style-type: none"> ○ Peat Restoration Plan for PT Temila Agro Abadi (PT TAA), - still awaiting approval from Indonesia's Ministry of Environment and Forestry (KLHK). Upon 	

Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
				<p>implementation of this plan, water levels will be maintained at an appropriate level to restore peat ecosystem functions.</p> <ul style="list-style-type: none"> ○ Developed a Peat Management Masterplan with the intention to rehabilitate the affected areas. The implementation of this Masterplan will be conducted in consultation with the relevant stakeholders, especially local communities who will be impacted by any decision made • Social: Safety deposit boxes construction timeline brought forward from 2021 to 2018 <p>30th Mar 2018 Olam met with FGV on 22 Feb 2018 with the following update:</p> <ul style="list-style-type: none"> • FGV has progressed with its time bound plans • <u>Kalimantan/Peat</u> <ul style="list-style-type: none"> ○ Area planted with peat to be restored during next round of replanting ○ Consultation completed for peat rehabilitation ○ Now awaiting on water monitoring points confirmation from government agency ○ Area not for replanting to be confirmed by FGV after 3rd party verification • Social Issues: <ul style="list-style-type: none"> ○ Action plan developed and implemented with SUHAKAM, TFT and WildAsia <ul style="list-style-type: none"> ▪ Safety boxes for passports ▪ Workers housing by 2021 ▪ Contract have been translated to local language and local language person available to explain ▪ Task card for hours worked ▪ Insurance coverage for foreign workers <p>30th Jan 2018 FGV's response to Chain Reaction Research is found here - click here. Summary as follows:</p>	

Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
				<ul style="list-style-type: none"> The Stop Work Order Notice dated 8 January 2018 was issued to APL to stop immediately all operations on land clearing at Grand Performance FGV is in the process of initiating an immediate HCS assessment to identify and exclude any HCS area (if there is any). The results of the aforesaid independent assessment would be conveyed in due course. The action plan will be communicated following the HCS assessment's results. <p>12th Jan 2018</p> <ul style="list-style-type: none"> FGV has successfully certified 8 mills at the end of Dec 2017 Following CRR's allegation against PT TAA and PT CNP in Kalimantan, FGV has consulted with Badan Restorasi Gambut and & Kementerian Lingkungan Hidup dan Kehutanan (KLHK) in Kalimantan to understand the requirements on peat rehabilitation. The summary is as follows: <ul style="list-style-type: none"> PT TAA and PT CNP will monitor water levels continuously and submit report to PT CNP FGV and RSPO will work together to conduct field investigation into allegations made by CRR against PT TAA FGV has requested for an independent verification of community conflict concurrently with the above. The situation is high risk based upon letters received from Dinas Perkebunan Kabupaten and from local community which had 780 signatures <ul style="list-style-type: none"> FGV has shared with us its tentative Peat Management Master Plan which starts from Sept 2017 to Dec 2019 <p>ASIAN Plantation Deforestation Allegation Update</p> <ul style="list-style-type: none"> Following the release of two articles Stop order issued to APL for all land clearing HCS assessment. Any HCS area to be excluded (results will be communicated) Action plan based on HCS assessment <p>5th Oct 2017</p> <ul style="list-style-type: none"> FGV adopted Social Compliance and Human Rights Action Plan to address gaps from WSJ's, Wild Asia & TFT report 	

Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
				<ul style="list-style-type: none"> Status of implementation of Action plan is available here <p>28th Aug 2017 FGV updated its Group Sustainability Policy in August 2017 from being applicable only to new land acquisition after the date of endorsement (25th Aug 2016) to:</p> <ol style="list-style-type: none"> No deforestation, no conversion of High Conservation Value area (HCV), no new planting on peat immaterial of size and depth, no development of areas classified as having High Carbon Stock irrespective of when the land was acquired or owned by FGV Group. Adopting best management practices for existing peat land estates and endeavour to rehabilitate peat lands that have been planted after 25th Aug 2016; and Immediately stop all new development on peat irrespective of the date of acquisition or any previous RSPO NPP approval and committed to the restoration of 1,000 ha of peatland. 	
3	1 st Oct 2018	Wilmar	Allege buying from groups that are deforesting and land grabbing	<p>Sept 2018: Greenpeace - The Final Countdown</p> <p>7th Dec 2018 Wilmar has issued a joint statement with Aid Environment as well as supported by Unilever and Mondelez on the following:</p> <ul style="list-style-type: none"> Starting Jan 2019, Wilmar will implement a “Suspend then engage” procedure on the basis of verified proof. Since May 2018, group level maps has been a condition for trade for all new suppliers. These maps will be uploaded to Aidenvironment supplier group mapping platform A “Reengagement Protocol” will be published specifying the time-bound process to engage suppliers that have been suspended, including the terms and conditions to resume sourcing. Full details on the action plan is available - here <p>9th Nov 2018 Wilmar published its two-year progress report covering</p>	Monitoring Implementation of Action Plan

	Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
					<p>Olam has engaged with Wilmar and part of that engagement includes meeting with Wilmar on 11th Oct 2018 Key updates are:</p> <p>31st Oct 2018</p> <ol style="list-style-type: none"> 1. Wilmar will develop a system that will accurately monitor land use change across countries we source palm oil from. The system will use near real-time satellite monitoring that will provide independent verification of compliance with their NDPE policy. 2. The output of the monitoring will be shared independently 3. Monitoring will cover both areas that supply to Wilmar and areas linked to its suppliers. 4. Timeline of action is available here 	
4	24 th May 2018	<p>Bunge</p> <p>Loders</p> <p>Crocklan</p> <p>LDC</p> <p>Sime Darby - Unimills</p> <p>GAR</p>	<p>Allegations:</p> <ul style="list-style-type: none"> • Illegal FFB sourced from Tesso Nilo National Park ("TNNP") • Deforestation on peatlands with moderate to deep peat. • Landsat 8 images dated 19 Oct 2017 indicated land clearing in PT Triomas during Aug 2016 – Oct 2017 totalling 110 ha. No land clearing in the same period from PT Uniseraya 	<p>May 2018</p> <p>Eyes on the Forest – Enough is Enough</p> <p>2015: Eyes on the Forest</p> <p>Mighty Earth</p>	<p>9th April 2019</p> <p>On 29th Jan 2019, an international NGO visited the area with the aim of developing a traceability pilot project in 2019 to implement 100% traceability. The mills have shown that they have traceability to source. Monitoring is ongoing.</p> <p>Sime Darby Unimills has confirmed that PT Triomas & PT Uniseraya are not within their supply chain.</p> <p>January 2019:</p> <p>Bunge LC reported that following engagement with Apical it was confirmed only PT Inti Indosawit Subur is owned by Apical. The other mills mentioned in the EoF report act independently from Apical.</p> <p>November 2018</p> <p>Our suppliers are having ongoing engagement via ART programme and with EOF/WWF</p> <p>13rd Sept 2018</p> <p>GAR had a meeting with EOF on 24th July to discuss the report and plan for a landscape approach</p>	Monitoring implementaion of action plan

Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
				<p>Bunge LC updated that a joint statement will be by stakeholders on updates.</p> <p>20th July 2018 GAR will be discussing the report with EOF and engage with the mills through its 2018 Collaboration for Transformation (CFT) programme focusing on Traceability to Plantation</p> <p>GAR has conducted site visits to 4 mills under its Aggregate Refinery Programme and grievance management between 2015- 2018</p> <p>31st May 2018 The following Companies and supplying mills were listed in the report:</p> <p>GAR PT Tri Bukti Sarimas 1, Bukit Payung</p> <ul style="list-style-type: none"> GAR is planning to enroll TBS in 2018 Collaboration For Transformation (CFT) programme. CFT is a development programme especially designed for assisting GAR suppliers for a specific need 8-11Nov 2016: GAR and Sarimas engaged in ART (Aggregator Refinery Transformation) programme for Agro Sarimas (its other mill in Riau) which included site visit assessment and action plan development towards GAR Social and Environmental Policy (GSEP) compliance. <p>LDC: PT Berlian Inti Mekar Rengat LDC will investigate and update Olam</p> <p>Bunge LC (100% purchased as RSPO MB oil)</p> <ul style="list-style-type: none"> 2000 smallholders from the Tesso Nilo National Park were relocated back in 2016. Bunge is checking with its suppliers and will update Olam. <p>Mills listed area: 1. PT Berlian Inti Mekar Rengar</p>	

Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
				<p>2. Pt Citra Riau Sarana 1 (Teso Satu)</p> <p>3. Pt Citra Riau Sarana 2 (Teso Dua)</p> <p>4. Pt Citra Riau Sarana 3 (Teso Tiga)</p> <p>5. Pt Gemilang Sawit Lestari</p> <p>6. Pt Indosawit Subur Ukui 2</p> <p>7. Pt Makmur Andalan Sawit</p> <p>8. Mitra Unggul Pusaka Segati</p> <p>9. Peputra Supra Jaya</p> <p>10. Putera Keritang Sawit</p> <p>11. Rigunas Agri Utama Bunga Tebo</p> <p>12. Rigunas Agri Utama Peranap</p> <p>13. Sujih Riesta Jaya</p> <p>14. Sumbar Andalas Kencana Muara Timpeh</p> <p>15. Swakarsa Sawit Raya</p> <p>16. Tri Bakti Sarimas 1 (Bukit Payung)</p> <p>17. Pt Tri Bakti Sarimas 2 (IBUL)</p> <p>18. Panca Eka (PT Kebun Pantai Raja, PT Triomas FDI, PT Uniseraya)</p> <p>Sime Darby (Unimills) – RSPO MB</p> <ul style="list-style-type: none"> Pt Inti Indosawit Subur (RGE/Asian Agri) Ukui 1 Pt Inti Indosawit Subur (RGE/Asian Agri) Ukui 2 <p>Overall response from Wilmar (Listed mill not in Olam's supply chain)</p> <ul style="list-style-type: none"> Illegal oil palm operators not being listed by the report List requested following a meeting held on 16th Nov 2016 hosted by MoEF and RETN on illegal suppliers. List also requested from the government but the list has not been provided. Operators within the park have also not been removed Wilmar has provided inputs and clarification to EoF directly. <p>Apical Listed mill PT Mitra Unggul Pusaka not in Olam's supply chain</p>	
5	30 th Mar 2018	Bunge LC (sourcing from Wilmar, Musim	<p>Allegations against IOI Group and its suppliers for:</p> <ul style="list-style-type: none"> Land clearing No proper FPIC conducted 	<p>27th Sept 2016: A Deadly Trade-off: IOI's Palm Oil Supply Chain and its Human and</p> <p>March 2019 Eagle High is committed to maintain the moratorium.</p> <p>25th July 2018</p>	<p>Moratorium in place.</p> <p>Monitoring of action plan</p>

Date	Direct Supplier	Issues	Source	Action Taken & Outcome	Status
	Mas and GAR)		Environmental Cost	<p>A moratorium remains in place. FPIC training has taken place. FPIC is still on hold while capacity of the team is increased.</p> <p>31st May 2018 FPIC exercise will commence year end, to give time to increase capacity of team</p> <p>30th Mar 2018</p> <ul style="list-style-type: none"> Bunge to update Olam on the latest development since the FPIC training and result of field visit in Oct 2017 <p>Dec 2017</p> <ul style="list-style-type: none"> Internal FPIC training process is now being conducted to restart the FPIC process for the community surrounding the concession. Site visit conducted in Oct 2017. In April 2017 found progress made on site 	through our direct suppliers

OLAM INDIRECT SUPPLIERS

Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
6	24 th June 2019 Bakri Sumatra Plantations Group PT Menthobi Mitra Lestari	Bunge	Deforestation: Satellite imagery showing that between April 17, 2019 and May 27, 2019 a total of 115 hectares of forest were cleared and 40 hectares were prepared for clearance in the PT Menthobi Mitra Lestari concession	Mighty Earth Rapid Response 16	<p>26th June 2019 This is an indirect source through Bunge.</p> <p>We do not receive oil from PT Menthobi Mitra Lestari but from other mills under Bakrie Sumatera Plantations.</p> <p>Bunge has updated that they are investigating the company link as well the allegations in ME's report.</p>	Engaging
7	24 th June 2019 Genting Group PT Citra Sawit Cemerlang	Bunge	Deforestation March 17 – May 15 2019 – deforestation of 175 ha's in PT CSC concession	<p>Mighty Earth Rapid Response 16</p> <p>Mighty Earth Rapid Response 15</p>	<p>27 June 2019 Bunge has shared with us a letter from Genting Plantations dated 2nd June 2019 signed by Clifford Che Keng Soon (Marketing) that a stop work order has been put in place on new land clearing for PT Citra Sawit Cemerlang.</p>	Engaging

8	24 th June 2019	Shin Yang LPF 0018	Sarawak Oil Palm (allege)	Forest Clearance 214 ha of forest was prepared for clearance by Shin Yang LPF 0018 concession between 20 th Feb -13 May 2019	Rapid Response Report 15	<p>28th June 2019 SOP has clarified with us on 5th of April 2019 as well as again on 27th May 2019 that SOP and SY are separate legal entities.</p> <p>We have shared the report with SOP.</p>	Engaging
9	8 April 2019	Double Dynasty/ Radiant Lagoon Mill: DD POM	Wilmar (Wilmar does not source from Radiant Lagoon, but their supplier DDPOM is associated with Radiant Lagoon as they both have a common key shareholder)	Allege conflict with indigenous Penan and Berawan communities as a result of development in the concessions	Mighty Earth Rapid Response 13	<p>21st May 2019. We have received information from Mighty Earth that Double Dynasty is in our supply chain through Wilmar listed as DD POM. DD POM is associated with Radiant Lagoon as they both have a common key shareholder</p> <p>We have reached out to Wilmar and have the following update:</p> <ul style="list-style-type: none"> • Wilmar has suspended purchase as of April 2019 • Wilmar is continuing to monitor Radiant Lagoon's activities on monthly basis through its Supplier Group Compliance Verification programme. • Prior to the publication of Mighty Earth Rapid Response Report 13 in March 2019 on the allegation of land conflict and deforestation at Radiant Lagoon, Wilmar had already initiated engagement with DD POM since late February 2019. • First meeting with DD POM was conducted on 11 March 2019, where we have sought clarification and documented evidence of Radiant Lagoon's operation. • A field visit to verify this grievance was conducted from 25th March – 27th March 2019 onwards. • A meeting was further held with DD POM on 29 April 2019 to share the outcome field visit report and expectation from Wilmar on DD POM in complying to the NDPE policy and re-entry criteria. • Wilmar has committed to support and provide guidance to DD POM in developing an action plan to address the issues identified in the field visit. 	Suspended

						<p>8 April 2019 Olam was listed by ME Rapid Response Report 13 as being a direct/indirect trader with Double Dynasty. However, Olam does not trade directly and indirectly with the group based on the Dec 2018 mill list.</p>	
10	30 th Mar 2018	<p>TH Plantation Berhad (THP)</p> <p>PT Persada Kencana Prima, a subsidiary of TH Plantation Berhad</p>	Wilmar Bunge LC	<p>Allegation:</p> <ul style="list-style-type: none"> • Clearance of forest, including primary forest, in Papua • Development on peatland 	<p>July 2018 The Chain: TH Plantations' Stop Work Order Violated by PT Persada Kencana Prima's Deforestation</p> <p>Mighty Earth Rapid Response 5</p> <p>2016 Greenpeace: Deadly Trade-off IOI's Palm Oil Supply and its Human and Environmental Cost</p>	<p>Olam does not buy from the mills in question but we receive oil from mills owned by the parent company Tabung Haji through Wilmar. Following various reports and THP withdrawal from the RSPO we have asked Wilmar to suspend THP from our supplies as well as provide us updates on THP progress.</p> <p>3 July 2019 According to Wilmar's grievance log viewed on 3rd July – PT PKP continues to cease all activities on the ground</p> <p>17 May 2019 We have written to Wilmar for an update on THP. From the Grievance log, we have the following update:</p> <p>In July 2018, Wilmar detected land use change. THP clarified that the area was originally cleared several years ago but was not planted due to operational constraints. THP claimed that the land use change detected is due the re-stacking of area now that planting is resuming.</p> <p>Wilmar held a meeting with the supplier on 12th Sept 2018.</p> <p>The independent assessor was hired field assessment was carried out from 15 – 19 October 2018. The field assessment included mapping of the said area. A proposed rehabilitation plan will be established if there is indeed new land clearing Report is underway</p>	Suspended

						<p>24th Sept 2018 Suspension remains in place by Bunge</p> <p>Mar 2018</p> <ul style="list-style-type: none"> Has been suspended by Bunge LC 	
11	25 th June 2018	GAMA	Wilmar	<p>Allegations Deforestation by a palm oil business run by Wilmar Indonesia's senior executives - Gama Plantation</p>	<p>25 June 2018 Greenpeace: Rogue Trader - Keeping Deforestation in the Family</p>	<p>28 Dec 2018 On 17 October 2018, GAMA has officially launched their corporate website, where they have published their concession maps for stakeholders monitoring - here</p> <p>31st Oct 2018</p> <ul style="list-style-type: none"> Investigations found that GAMA has no management control over PT Incda and PT Gandaerah Hendana. It has been managed solely by Samasung C&T as the major shareholder. Wilmar has lifted its suspension on these two companies <p>7th Sept 2018</p> <ul style="list-style-type: none"> On 10th Aug 2018, GAMA and Aidenvironment issued a joint statement that they have entered into a 3-year Collaborative Agreement on developing and implementing an NDPE Policy. 25 corporate entities will be consolidated and NDPE implementation Policy will be led by Andy Indigo. Stop Work Orders (SWO) have been issued to the management of all 25 entities and no new development will take place until NDPE is in place/for a minimum period of (1) year. Replanting will be limited to areas vulnerable to pest and disease. Replanting on peat will be subject to consultation with the Indonesian authorities <p>26 July 2018</p> <ul style="list-style-type: none"> Olam has engaged with Wilmar on the status of this Grievance. 	Monitoring implementation of action plan

						<ul style="list-style-type: none"> Wilmar has confirmed that they are no longer purchasing from the companies said to be part of GAMA GAMA is in discussion with a sustainability consultant <p>20 June 2018 Letter from Wilmar's CEO</p> <ul style="list-style-type: none"> Wilmar has decided to cease sourcing from companies with an alleged commercial relationship with GAMA Corp until it receives satisfactory confirmation of ownership Wilmar acknowledges that there should be more stringent oversight on the ownership verification <p>19th June 2018</p> <ul style="list-style-type: none"> GP shared with Wilmar a list of suppliers that are allegedly linked to GAMA Corp. Committed to a partial moratorium on deforestation. The moratorium excludes the concessions the company is currently clearing in Papua. Wilmar CEO Kuok Khoon Hong announces that Wilmar will no longer buy from Gama companies 	
12	30 th Mar 2018	PT Kahayan Agro Plantation (PT KAP) (Anglo Eastern Plantations – “AEP”)	Bunge LC (buying from GAR and Wilmar)	<p>April 2019: ME Report 14 reports 189 ha deforestation in PT KAP</p> <p>Allegations by ME regarding PT Kahayan Agro Plantation (PT KMP) reported as owned by Anglo Eastern Plantations</p> <ol style="list-style-type: none"> Deforestation between October 16, 2016 and September 26, 2017 of an estimated 420 hectares including clearing of Bornean orangutan habitat Land conflicts and licensing issues 	<p>April 2019 Mighty Earth Rapid Response Report 14</p> <p>20th July 2018 Mighty Rapid Response Report 1</p>	<p>17th May 2019 Bunge will engage with its trade partner to verify the allegations in the report</p> <p>9th April 2019 In March AEP appointed PT Meganesia Tirta Foresta to conduct HCS assessment at PT KAP, field assessment was conducted in April 2018. More details available here</p> <p>The draft HCS assessment report was shared with Wilmar in October 2018. The report is undergoing peer review.</p> <p>Dec 2018 Ongoing engagement. AEP plans to establish NDPE policy in 2019</p>	<p>Moratorium in place.</p> <p>Monitoring implementation of action plan through our direct suppliers</p>

						<p>November 2018 HCS assessment done and will undergo peer review. AEP is in process of incorporating HCS commitment in Sustainability Policy. Bunge LC's direct trade partner monitors PT KAP's activities on a monthly basis to ensure they will uphold their commitment to the moratorium.</p> <p>October 2018 Assessment results were being socialized to community and employees. AEP reiterate commitment to HCS/HCV conservation.</p> <p>21st Sept 2018 Bunge LC is monitoring the milestones. Bunge LC to provide Olam with further details.</p> <p>30th Mar 2018 Bunge LC does not receive oil from PT KMP but buys from Anglo Eastern through GAR and Wilmar. Currently a moratorium in place for development. Bunge LC will update further once it completes its investigation/engagement with GAR and Wilmar</p>	
13	30 th Mar 2018	Triputra Agro Persada	Bunge LC	<p>Allegations:</p> <ol style="list-style-type: none"> 1. Lack of NDPE Policy 2. Deforestation <p>Conflict with local people and community</p>	<p>Chain Reaction Research - NEW ANALYSIS: Palm Oil Producer Triputra Agro Persada's Lack Of Transparency And Responsibility Puts Rapid Growth At Serious Risk</p>	<p>April 2019 Clearing was done in according to HCV and HCS assessment. The assessment reports will be shared.</p> <p>Internal monitoring has not identified any further clearing. Monitoring for continue for 12 months was the date the grievance was raised by Bunge LC</p> <p>28 Dec 2018 HCV and HCS assessment have been completed</p> <p>24th Sept 2018 Triputra Agro Persada have a NDPE Policy in place. Bunge trading partners are monitoring and confirmed that there are no deforestation taking place</p> <p>20th July 2018 No further update from Bunge LC</p>	Monitoring

						<p>31st May 2018 Bunge have visited Brahma Bina Bakti & receive regular updates from Triputra Agro Persada, who it is believed are moving in the right direction with no evidence seen of active clearing.</p> <p>Bunge provided a statement issued by TAP that details their commitment to abide by prevailing laws & regulations in all aspects of its activities, such as EIA, zero burning, & moratorium map on peat & primary forest area, along with aiming to meet globally acknowledged sustainability standards.</p> <p>30th Mar 2018 Bunge LC to provide Olam an update.</p>	
14	21 st Nov 2017	<p>Samling Group</p> <p>Samling Reforestation (Bintulu) Sdn Bhd (Sarawak)</p> <p>Samling Jelalong LPF 0007 (Mighty Earth Rapid Response 15,16)</p>	<p>Wilmar</p> <p>LDC (suspended supply from Samling)</p> <p>Bunge LC – Suspended supply from Samling</p>	<p>Allegations:</p> <ol style="list-style-type: none"> Mighty Earth Rapid Response 16: of 6 hectares of forest were cleared and 56 hectares were prepared for clearance in the Samling Jelalong LPF 0007 Mighty Earth Rapid Response 13: Satellite imagery (see below) shows that between January 7, 2019 and February 16, 2019, a total of 44 hectares of forest were cleared in the LPF/0008 Marudi & Batu Belah concession Response Mighty Earth Rapid Response 11: Satellite imagery shows that between September 12 and November 30, 2018, a total of 104 hectares of forest were 	<p>June 2019: Mighty Earth Rapid Response 16</p> <p>Mighty Earth Rapid Response 15</p> <p>Mar 2019: Mighty Earth Rapid Response Report 13</p> <p>Dec 2018: Mighty Earth Rapid Response Report 11</p> <p>Nov 2017: Greenpeace Palm Oil Alert (Nov 2017)</p>	<p>8th April 2019 Wilmar has updated that Samling has confirmed that there is no oil palm operations in region reported in Mighty Earth Rapid Response Report 13. The area specified, and activities conducted are related to the Licensed Planted Forest (LPF).</p> <p>31st Jan 2019 Bunge has suspended supplies from Samling and have informed its trading partners accordingly.</p> <p>28th Dec 2018 Olam has reached out to Wilmar and will update on this allegation.</p> <p>26th July 2018</p> <ul style="list-style-type: none"> Olam has engaged with Wilmar on this case. There is a moratorium in place for development Samling has conducted a HCV assessment and a report has been produced. <p>31st May 2018 LDC - Samling no longer in the supply chain of LDC.</p>	<p>Monitoring implementation of action plan through our direct suppliers</p> <p>Bunge and LDC have suspended supply</p>

				<p>cleared in the LPF/006 Samling-Lana concession</p> <ol style="list-style-type: none"> 4. Company does not have a 'no deforestation, no peat, no exploitation' policy 5. Indonesian concessions do not appear to have been certified by the Indonesian Sustainable Palm Oil (ISPO) 6. Deforestation: Clearance of natural forest in North Kalimantan, PNG and Myanmar 7. Exploitation: Development without Free, Prior and Informed Consent (FPIC) of affected communities and human rights violations 8. Use of fire: Apparent use of fire for clearing land 	<p>30th Mar 2018 Wilmar</p> <ul style="list-style-type: none"> • The company has divested from PNG operations • No land clearing activity for palm. Wilmar will be visiting Indonesia for verification (<i>updated</i>) • During the field assessment, it was verified that there was no breach of Wilmar's NDPE policy. Specifically: <ul style="list-style-type: none"> ○ Location of area which was identified as deforestation in the NGO report is an area which is a mature planted forest of with Acacia sp. mix with Eucalyptus sp. ○ The existing Acacia sp. and Eucalyptus sp. trees were recently harvested and is currently undergoing replanting with the same two species. ○ During the visit, no sign of new oil palm development was found in the areas designated for Acacia sp. and Eucalyptus sp. tree plantation • Ref N32 on Wilmar Grievance Log <p>LDC Call with LDC on Samling group. Samling is not responsive to emails from LDC. LDC will provide time bound plan.</p> <p>Samling Group supplies Olam through Wilmar and LDC. LDC sources the oil from GAR and Sunfield</p> <p>Dec 2017 Wilmar has met with Samling group in December 2017. Through their monitoring and due diligence, they have also initiated discussion with Samling on their operation in Indonesia, Malaysia and Papua New Guinea since August 2017 (ref here). Wilmar and LDC to submit their time-bound grievance plan for LDC.</p> <p>Nov 2017</p> <ul style="list-style-type: none"> • We have engaged with both Wilmar and LDC on the matter. Both have shared that they will be 	
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						engaging directly (Wilmar) and indirectly (LDC) with Samling and will update us on the outcome	
15	30 Mar 2018	Rimbunan Hijau Gilford Ltd, a subsidiary of Rimbunan Hijau (PNG) Group Jaya Tiasa Holdings Bhd (Rapid Response 12)	Wilmar	Allege deforestation in PNG by Gilford Ltd.	Mighty Earth Rapid Response 12 Aug 2017 Global Witness: Stained Trade	9th April 2019 Olam does not source from Jaya Tiasa (Rapid Response 12) but receives oil from Rimbunan Hijau through Wilmar. We are waiting for an update from Wilmar. On Gilford, Wilmar does not source from Gilford but from Rimbunan Hijau. It has initiated engagement in Sept 2018 to seek clarifications on allegation of deforestation at the Papua New Guinea site. On 20 September 2018 , Gilford Ltd provided a written commitment in adhering to the NDPE policy and shared its concession maps for further investigation. 25th July 2018 Wilmar has updated that the allegations focus on timber hence not palm related 31st May 2018 Olam has followed up with Wilmar on the latest update 30th Mar 2018 This is a potential new Grievance for Wilmar. They are investigating and will update Olam on the findings	Moratorium in place for Gilford Ltd. Awaiting update on Jaya Tiasa

CASES HANDLED BY THE RSPO

Cases Handled by the RSPO - Olam's Direct Suppliers

	Date	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
16	23th Dec 2016	First Resources <i>PT Limpah Sejahtera</i>	<p>The company failed to carry out HCV assessment prior to land clearing and planting and not in compliance with RSPO's New Planting Procedure (NPP).</p> <p>RSPO Case Tracker: Non-compliance on the RSPO's New Planting Procedure (NPP).</p> <p>Violation of P&C 7.3 - New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</p> <p>Violation of RSPO P&C 5.2 - The status of rare, threatened or endangered species and other High Conservation Value habitats, if any that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>	Might Earth RSPO Case Tracker	<p>17 May 2019 On 11 Mar 2019, RSPO sent a follow-up on the Show Cause Issued to FR.</p> <p>On 8 April 2019 FR sent a response to the RSPO on the show cause and on 30th April the RSPO responded to First Resources response.</p> <p>In summary:</p> <ul style="list-style-type: none"> • PT Limpah's LUCA has been nullified due to "withholding"/miscommunication of the presence of peat. Hence the LUCA needs to be redone. • Certification of PT Limpah remains suspended while the rest of the companies can proceed with certification • RSPO has uploaded all of FR's responses (14th Feb 2018, 3rd July 2018, 21st Nov 2018, 2nd Jan 2019 and 8 April 2019) to the RSPO website. <p>9th April 2019 On 21st Dec 2018 a show cause letter issued to First Resources. Investigation initiated by Complaints Panel that FR wilfully withheld information related to development on peat during the LUCA review. Full letter available here - here</p> <p>FR has provided a response on 3rd Jan 2019. The RSPO CP's decision is to be communicated to the respondent.</p> <p>26th Sept 2018 RSPO Secretariat to review the milestones</p> <p>31st May 2018</p> <ul style="list-style-type: none"> • Compensation procedure in place • Company can proceed with certification of other units • Monitoring of compensation procedure by the RSPO is ongoing <p>20th Feb 2018 Review of RSPO Case Tracker</p>	Case handled by RSPO Complaints Procedure

Date	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
				<ul style="list-style-type: none"> Company has submitted the LUCA and will proceed to the next phase. Findings of the LUCA review to be communicated to the Company; CP to issue their response to the request from the Company (dated 9 January) in relation to lifting of the suspension allowing the Company to proceed with the certification of its other management units. <p>20th Jan 2017 Contact FR on 5th and 20th Jan. FR confirmed that:</p> <ul style="list-style-type: none"> Complaint on RSPO NPP has been closed by the RSPO but unresolved. Disputed land has been enclaved from development FR has engaged ME directly to resolve allegations 	

Cases Handled by the RSPO - Olam's Indirect Suppliers

Date	Direct Supplier	Indirect Supplier	Issues	Source	Action Taken and Outcome	Status
17 30 th Nov 2018	Bunge, ISF	PT Susantri Permai (a subsidiary of Genting) PT Kapuas Maju Jaya (a subsidiary of Genting) PT Dwie Warna karya (a subsidiary of Genting Plantations Berhad)	Allegations that: <ul style="list-style-type: none"> PT. Susantri Permai, PT. Kapuas Maju Jaya and PT. Dwie Warna Karya are illegally operating and planting palm in the area of Productive Forest. The three companies were alleged to break the Indonesian law specifically UU No. 41 Tahun 1999, UU No. 18 Tahun 2013, and UU No. 39 Tahun 2014. The 3 companies have not obtained forest land 	RSPO Case Tracker	Olam buys indirectly through Bunge and ISF from the parent company and not the suppliers listed here. <p>17 May 2019 A decision letter was delivered on 4th Feb and is now pending appeal. It was found that all 3 subsidiaries conducted development prior to Izin Pelepasan Kawasan Hutan (Forest Release), Izin Tukar Munukar Kawasan Hutan (forest exchange) and Hak Guna Usaha (HGU). Hence:</p> <ol style="list-style-type: none"> Stop Land Clearing initiated by respondent to remain 	Investigation by the RSPO CP

				swap area or Forest Area Release Permit and Business Permit (HGU).		<p>2. Each subsidiary to proceed with development once national legal and RSPO requirement are met including the new P&C</p> <p>8 April 2019 No update from the RSPO CP</p> <p>28th Dec 2018 No update from the RSPO CP</p> <p>26th Sept 2018 The RSPO CP to deliver a decision soon.</p> <p>Full details -here</p>	
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CLOSED CASES

Closed Cases: Olam

	Date Filed	Business	Issue	Source	Action Taken & Outcomes	Status
18	30 th Mar 2017	Olam Palm Gabon	Land conflict 242 ha of community set aside identified through FPIC process claimed by Bemboudie Village is mistakenly classified as development area under the Boungounga Village who share some families and territories with Bemboudie	Self-registration by Olam	30th Mar 2017 Consultation with Bemboudie community was conducted in Ndolou, Mandji near to Mouila palm plantation in Gabon. Mutual agreement was reached and resolutions including compensation, establishment of social fund for community projects, development of cassava and banana farms etc. was agreed through the facilitation by Olam's social engagement tem and independent third parties	Closed
19	12 th Dec 2016	Olam International	<ul style="list-style-type: none"> Allegation of deforestation in own plantations and third party trading Impact of plantations on natural streams and lakes, which are a key source of water (village of Ferra relative to the Rembo river) ref here 	Mighty Earth: Palm Oil Black Box CNDC 11.11.11 Le Mythe De L'Huile De Palme 100% Durable (The Myth of 100% Sustainable Palm Oil) (in French)	5th Feb 2018 Report from CNDC 11.11.11 referring to Mighty Earth Black Box Report among others. <ul style="list-style-type: none"> Olam Palm Quarterly Dashboard contains the relevant information such as HCV area that is protected, concession area RSPO certification and social contracts reached with the villagers 25th Jan 2018 Olam and ME met and renewed agreement. renewed agreement Summary of the discussion are as follows: <ol style="list-style-type: none"> It was acknowledged that the last agreement had been respected and that significant progress has been made across the board. Olam and Mighty Earth agreed on a number of new commitments demonstrating their shared interest in developing sustainable agriculture For Palm Products sourcing, both parties agreed to support broader industry moves to improve compliance of suppliers with no-deforestation commitments, and Olam will continue its drive towards greater transparency, engagement and verification with its own suppliers. 	Closed

Date Filed	Business	Issue	Source	Action Taken & Outcomes	Status
				<p>4. Its oil palm and rubber operations in Gabon, Olam agreed to wait for the resolution of questions on the application of HCS (High Carbon Stock) methodologies in Gabon for a further year.</p> <p>5. Olam shared the progress it has made on its forthcoming global cross-commodities sustainability policy and Mighty agreed to explore conservation and restoration initiatives related to this policy</p> <p>Oct 2017 We have done water analyses in all rivers crossing our concessions (latest in October 2017) and results showed that all parameters (489 tested) are satisfactory. No form of pollution by any type of exogenous sources were found. Water monitoring is conducted every three months according to our Water Management Plan</p> <p>24th July 2017:</p> <p>Update from Olam International and Mighty Earth on engagement process following visit to Olam palm plantations in Gabon</p> <ul style="list-style-type: none"> Olam and ME had a 5-day series of meetings including a visit to Gabon as part of the 2017 agreement. Meeting among others were with Gabon government officials (Minister of Agriculture, the Parliamentary Sustainable Development Commission, the Secretary-General of the National Parks Agency, the Head of the National Climate Council, the Minister in Charge of Presidential Affairs, and the Director General of the Environment) as well as roundtable meetings with Gabonese NGOs belonging to the environmental and human rights civil society platform: "Gabon, Ma Terre, Mon Droit " (Gabon, My Lands, My Rights). NGO delegation including Mighty, The Forest Trust (TFT), and local NGOs Brainforest, WWFGabon, FENSED, and Muyissi Environnement spent 2 days visiting Olam's palm oil plantations and the landscape and communities of Ngounie Province, southern Gabon. <ul style="list-style-type: none"> Visited a small part of the 18,000 ha conservation set-aside within Lot Held village meetings with 3 villages among the 87 villagers that have FPIC and social contracts with Olam 	

Date Filed	Business	Issue	Source	Action Taken & Outcomes	Status
				<ul style="list-style-type: none"> Visit to OPG's Mouila Lot 3, 14,000 ha savannah plantation compliant with RSPO's NPP, on a strict zero-deforestation basis. Includes the first HCV savannah ecosystem mosaic under active management in the RSPO system The NGO's observe that Olam's social team has strong connections to the villages and has previously addressed and documented both the grievances expressed and the solutions proposed. <p>Feb 2017</p> <ul style="list-style-type: none"> Olam published its updated Palm Policy Statement - Olam and Mighty Earth agree to collaborate on forest conservation and sustainable agriculture in highly forested countries <ul style="list-style-type: none"> ➤ Suspend further land clearing of forest in Gabon for palm and rubber plantations for a year (a period that can be extended). During this time, Mighty Earth and Olam agreed to support a multi-stakeholder process to develop further specific criteria for responsible agricultural development in countries that have most of their land covered by forests. ➤ Continue to implement its time-bound plans to map and disclose more information about its third-party palm oil supply chains in Asia and require its third party suppliers to adhere to the High Carbon Stock Approach (described at highcarbonstock.org) as per its updated Palm Oil Policy. ➤ Publish its procedures to address supply chain risks, including independent verification of compliance of high-risk sources. ➤ Issue a revised grievance procedure that includes Olam's third-party palm oil suppliers and protects the anonymity of those providing input. Olam will continue to routinely investigate and work to remediate any complaints received from indigenous or local communities. ➤ Supplement its current sustainability policies with explicit references to protecting peat and ensuring no exploitation of workers or local communities. ➤ Mighty Earth agreed to: ➤ Suspend its current campaign targeting Olam's oil palm and rubber operations for a year, including its complaint to FSC (a period that can be extended). 	

	Date Filed	Business	Issue	Source	Action Taken & Outcomes	Status
					<p>➤ Work with the Gabonese government, civil society, and international experts and stakeholders to advance conservation and responsible development.</p> <p>12nd Dec 2016 Statement from Olam and Mighty agree to collaborate on Forest Conservation and Sustainable Agriculture in Highly Forested Countries was published on 21 February.</p> <p>Full response submitted by Olam on 12 December. See also Press Release: Building a Sustainable Palm Oil Response from the Republic of Gabon</p> <p>Other Policies under review. Contacted third party suppliers in question – see below.</p>	
20	4 th Dec 2017	Olam International	<p>Three reports from Greenpeace and Forest Heroes assess corporate commitments across the industry. Areas include:</p> <ol style="list-style-type: none"> 1. Policy robustness 2. Supply chain data transparency 3. Monitoring of supply chain 	<p>Mar 2018 Greenpeace's Report "Moment of Truth"</p> <p>Nov 2017 Greenpeace's Report "Still Cooking the Climate"</p> <p>Oct 2017 (data from 2016) Forest Heroes report: Green Cats: Scoring Palm Oil and Soy Companies on Forest Policies and Transparency</p>	<p>Olam responded with a public statement to the Greenpeace report on 4th December 2017 on matters relating to Palm Oil Policy, ownership of mills and progress with WRI and Proforest on risk assessment. We responded to the Forest Heroes Report on 21st November 2017. In addition, we updated our Sustainable Palm Oil Policy in January 2018, and also released our Palm Dashboard that transparently shares key matrices and tracks their progress. A list of the mills not covered by NDA has also been disclosed on the dashboard.</p> <p>Our Palm Policy is further supported by our new "Olam Living Landscapes Policy" which was released in April 2018 with its vision to move towards a net positive impact at scale based on the creation and restoration of natural and social capital within living landscapes.</p>	

Closed Cases – Olam’s Direct Suppliers

Date Filed	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
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21	30 th Mar 2018	GAR	<p>Allegations:</p> <ul style="list-style-type: none"> • Clearance of the Leuser Ecosystem's critically important Tripa peatland • New peat drainage canals built • Illegal fires to clear land • Loss of 24 hectares of forest inside the concession • Clearance after Government moratorium for land clearance for palm <p>July 16 and August 21, 2017, an additional 18 hectares were cleared inside the PT. SPS II</p>	<p>Aug 2017 RAN: PT. Surya Panen Subur II failing to stop illegal fires and destruction of Tripa peatland</p>	<p>Listed on 11 Nov 2014 on G03, GAR's Grievance Log. Full details at this link</p> <p>Field Visit Report available here</p> <p>September 2018 These mills are no longer in Olam's supply chain</p> <p>July 2018</p> <ul style="list-style-type: none"> • CFT programme at PT SPS 2 completed. • In April GAR's internal team detected land clearing in SPS concession. • In May SPS confirmed that encroachment happened and was done by Haji Sanusi. Foresthubs also published a report on peat clearance. The following action was taken: <p><u>SPS took the following action</u></p> <ul style="list-style-type: none"> • 12 Mar: Met with Haji Sanusi and clarified boundaries of SPS concession (HGU). Sanusi signed document declaring he understood • 13 Mar: Met with Village Head of Kuala Seumaya to report encroachment and submit acknowledgement by Sanusi and requested help to stop further encroachment • 15 May: Met with Sub District head, Head of Police Dept, Head of Military Dept to report encroachment and submit acknowledgment by Sanusi • Meeting between GAR and SPS was held to discuss action plan <p>Mar 2018</p> <ul style="list-style-type: none"> • Last up on GAR's log was Sept 2017. No new updates to date. <p>From log:</p> <ul style="list-style-type: none"> • GAR and TFT are supporting SPS in a programme called "Collaboration for Transformation (CFT)". This programme helps suppliers address problems in their supply chain such as implementing conflict resolution processes to address land tenure issues between SPS and local communities 	Closed
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	Date Filed	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
					SPS II confirmed there was a new land clearing and burning in the east part of SPS II concession committed by external parties (encroachers) in Jun-Jul 2017	
22	23th Dec 2016 (closed)	Mewah – Supplier in 2016 only	<p>Allegations are:</p> <ul style="list-style-type: none"> Operating on the largest peat dome in Kalimantan and actively clearing deep peat. Alleged to be a major customer of PT Persada Kencana Prima (PKP), subsidiary of TH Plantation Bhd. And PT TH Indo Plantations according to their 2012 annual report 	Mighty Earth	<p>10th Mar 2017 Mewah provide Olam with its traceability to mill information including GPS coordinates</p> <p>5th Jan 2017 Contacted Mewah and they have confirmed that:</p> <ul style="list-style-type: none"> They do not have plantation operations in Kalimantan Does not source from PKP and PT Indo <p>Olam will continue to engage with the supplier on full supply chain traceability</p>	Closed
23	23 Dec 2016 -	<p>Sarawak Palm Oil (SOP)/Shin Yang Group (SY)</p> <p>#Mar 2019: SOP has clarified that SY is a separate entity from SOP</p>	<p>10ha Peat Development by Linau Sinar Sdn. Bhd. (Metalon OP Estate, Lot 2, Danum LD)</p> <p>Peat clearance - here.</p>	<p>Mighty Earth Rapid Response 13 (Mar 2019)</p> <p>Climate Advisers (2014)</p>	<p>26 June 2019 In an email dated 27th May 2019, SOP has shared with us their desktop analysis done by Azlan Benjamin the Geo-Information Manager of SOP as well as SOP's report on Report 13 signed by Galau Melayong (SOP Sustainability Department).</p> <p>The conclusion is that the</p> <ul style="list-style-type: none"> The area is not peat area due to the 2 areas being based on the foothills and slightly steep which is not possible for peat formation. Metalon OP mentioned in Mighty's report is not a FFB supplier of SOP. <p>The analysis was done using overlay of a) Bing Online Satellite Imagery, b) Sarawak Soil Map c) Panoramic image of the 2 areas from Google Earth</p>	Closed

	Date Filed	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
					<p>17 May 2019 We are still awaiting an update from SOP</p> <p>April 2019 SOP has clarified that SOP and SY are separate legal entities. It is investigating the peat clearance allegations and will update Olam</p> <p>Dec 2016 Olam has phased out supply from SOP</p>	

Olam's Indirect Suppliers

	Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
24	8 April 2019	Palm Serasih Group (PT Global Primatama Mandiri) (allege)	Nil	Alleged clearance of 102 ha's shown on satellite imagery.	Mighty Earth Rapid Response Report 13	<p>8 April 2019 Olam was listed by ME as a direct/indirect trader of the company, however Olam does not trade directly and indirectly with the group based on the Dec 2018 mill list.</p>	Closed
25	30 th Nov 2018	Bunge, ISF, Unimills (Sime Darby)	PT Susantri Permai (a subsidiary of Genting Plantations Berhad)	<p>Complaint raised through the RSPO that:</p> <ol style="list-style-type: none"> 1. Orangutan found killed and eaten in the concession of PT Susantri Permai, a subsidiary of Genting Plantation 	RSPO Case Tracker	<p>25th Sept 2018: The CP found that the mitigation actions to have been successfully conducted. Full details available here</p>	Case Closed

	Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes	
26	30 th Mar 2018	PT Austindo Nusantara Jaya Tbk (ANJ): Concessions: Permata Putera Mandiri and Putera Manunggal Perkasa Mill: PT Permata Putera Mandiri (Blok 1)	Bunge LC (sourcing from Wilmar, GAR, AAA (Apical), Musim Mas)	Allegations: <ul style="list-style-type: none"> Deforestation of primary forest in Papua in 2013/14 Did not conduct proper FPIC Land disputes with local indigenous communities 	2018 Mighty Earth Rapid Response 6 2017 IOI Drops TH Plantation Amid Greenpeace Allegation 2016 Greenpeace: Deadly Trade-off IOI's Palm Oil Supply and its Human and Environmental Cost	28th Dec 2018 Bunge LC has updated that its trade partners are no longer buying from ANJ - see here 7th Sept 2018 Bunge LC has updated that suspension of ANJ's supply remains. Mar 2018 Suspended from Bunge LC's supply chain	Closed
27	30 th Mar 2018	PT Austindo Nusantara Jaya Tbk (ANJ): Concessions: Permata Putera Mandiri and Putera Manunggal Perkasa Mill: PT Permata Putera Mandiri (Blok 1)	Bunge LC (sourcing from Wilmar, GAR, AAA (Apical), Musim Mas)	Allegations: <ul style="list-style-type: none"> Deforestation of primary forest in Papua in 2013/14 Did not conduct proper FPIC Land disputes with local indigenous communities 	2018 Mighty Earth Rapid Response 6 2017 IOI Drops TH Plantation Amid Greenpeace Allegation 2016 Greenpeace: Deadly Trade-off IOI's Palm Oil Supply and its Human and Environmental Cost	28th Dec 2018 Bunge LC has updated that its trade partners are no longer buying from ANJ - see here 7th Sept 2018 Bunge LC has updated that suspension of ANJ's supply remains. Mar 2018 Suspended from Bunge LC's supply chain	Closed
28	12 th Apr 2018	PT Synergy Oil Nusantara (PT SON) (Refinery in Riau)	Direct Supplier	Allegation: <ul style="list-style-type: none"> Being a replacement buyer for both Sawit Sumbermas Sarana (SSMS) and Austindo Nusantara Jaya (ANJ) after both companies 	1 st May 2018 Major Islamic Financier Singled Out for Deforestation in Indonesia 12 th Apr 2018	Apr 2018 <ul style="list-style-type: none"> For 2018, Olam is no longer receiving oil from PT SON In an email on 19 April 2018, PT SON informed us that they are no longer part of TH Plantation starting 12th Mar 2018. They are now part of IFFCO Singapore Pte. Ltd. 	Closed

	Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes	
				were suspended by other traders for NDPE violations. <ul style="list-style-type: none"> Felda Global Ventures, is PT SON joint venture partner 	TH Plantations and PT Synergy Oil: Leakage Risk at Plantation and Refinery		
29	30 th Mar 2018	PT Bintang Harapan Desa	IFFCO	Allege deforestation and orangutan habitat destruction	Jan2018 Eco Daily - NDPE companies remain linked to destructive supply chains	30th Mar 2018 <ul style="list-style-type: none"> IFFCO has informed us on 21 Mar 2018 that PT BHD is no longer in its supply chain 	Closed
30	30 th Mar 2018	GAMA Corp (formerly GANDA)	Bunge LC	Alleged JV with Samsung which is said to be driving deforestation and land rights issues in Papua as well as human rights issues in Sumatra	Mighty Earth: Samsung partnership with Korindo ignites another fire scandal	24th Sept 2018 Suspension remains in place 31st May 2018 Bunge has removed this supplier from its supply chain 30th Mar 2018 <ul style="list-style-type: none"> Bunge LC to update Olam on these allegations 	Closed
31	30 Mar 2018	PT Global Sawit Semesta (PT GSS) (sourcing from PT Indo Sawit Perkasa	GAR	PT GSS buys from PT Indo Sawit Perkasa (PT ISP) that is alleged by RAN to be deforestation in Singkil Bengkung lowland tropical forest in violation of the Aceh Governor Circular 1, dated June 17th 2016. The circular stated that all holders of Land Use Rights Title (HGU) within the Leuser Ecosystem Area (KEL) had to cease all land clearing activity while the government reviewed palm plantation licenses and prepared an oil palm moratorium	March 2017: RAN PT. Indo Sawit Perkasa caught destroying the lowland rainforests of Singkil-Bengkung	30th Mar 2018 In Mar 2018, Olam had a discussion with GAR on PT GSS with the following updates: GAR conducted a site visit to the plantation with TFT. Purchasing documents were reviewed and it was found that PT GSS does not buy from PT ISP. Neither does the other mills within a 50km radius who supply to GAR Full site visit report here During the site visit, GAR/TFT team introduced Traceability to Planation (TTP) and GSEP which will enable the supplier to implement TTP Others: There is no FFB supplied by PT ISP to the seven GAR suppliers within 50km radius from PT ISP	Closed

	Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes	
32	12th Dec 2016	IOI IOI Pelita	Bunge LC	Public allegations on IOI: Deforestation, environmental degradation and human rights abuses. See references here and here .	Mighty Earth RSPO Case Tracker	<p>30th May 2018 IOI Pelita is not in Olam's supply chain</p> <p>30th Mar 2018 Olam does not source directly from IOI. Olam will be guided by RSPO's decision on the matter.</p> <p>20th Feb 2018</p> <p>Review of RSPO Case Tracker (IOI - IOI Pelita Sdn Bhd)</p> <p>24th Jan 2018 – CP Meeting: Secretariat to proceed with a meeting with the Company and Grassroots to discuss the revision to the Action Plan</p> <p>11st Jan 2018 IOI met with RSPO Secretariat to receive feedback from the CP on its Action Plan. However, the CP was not ready with its feedback, although some preliminary discussions about the Plan did take place. IOI have said that they will continue the planning for the field implementation in consultation with the relevant stakeholders. They also aim to continue collaboration with Grassroots and other NGO partners in working towards a fair and just solution for all concerned parties, in line with RSPO's Principles and Criteria.</p> <p>28th April 2017 Greenpeace suspends its campaign against IOI</p> <p>IOI's statement</p> <p>5th Jan 2017 Contacted IOI on 5 Jan and subsequent discussion</p>	Closed

Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes
					<p>has been organised. Requested clarification and actions taken on public allegations. IOI confirmed they have:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Revised their palm policy in August 2016 <input type="checkbox"/> Launched palm dashboard in December 2016 <input type="checkbox"/> Engaged Global Environment Consultant (GEC) <p>– peat specialist</p> <ul style="list-style-type: none"> <input type="checkbox"/> Published suppliers (mill list) and related grievances <input type="checkbox"/> Detailed response on Greenpeace report is also published on the website. <p>Olam will continue to monitor IOI's performance and engage with the supplier.</p>

	Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes	
33	30 th May 2017	Salim Group PP London Sumatra (subsidiary of PT Salim Ivomas, who is subsidiary of Indo Agri)	Wilmar (suspended Salim in 2017) Bunge LC (suspended Salim)	<p>Allegation from Aidenvironment's report:</p> <ol style="list-style-type: none"> 1. Illegal deforestation of Borneo's Ketungau peat swamp 2. Anthoni Salim Group's owner linked to ownership PT Duta Rendra Mulya and PT Sawit Khatulistiwa Lestari or association with that 3. PT Sawit Khatulistiwa Lestari, had successfully applied for a change to the government's peatland moratorium map to allow development, - almost all of the concession being categorized as "peatlands prioritized for protection <p>Allegations are:</p> <ol style="list-style-type: none"> 1. Salim Group using "shadow companies" to sidestep legal oversight. 2. Illegality: breaches of labour law including child labour and paying below minimum wage 3. Deforestation: considerable forest clearance in 2013- 	<p>RSPO Case Tracker</p> <p>12th Apr 2018</p> <p>Indonesian billionaire using 'shadow companies' to clear forest for palm oil, report alleges</p> <p>Palm oil Sustainability Assessment of Salim Related Companies in Borneo Peat Forest</p> <p>2017 Greenpeace Palm Oil Alert #2</p> <p>June 2016 RAN: The Human Cost of Conflict Palm Oil</p>	<p>Olam does not buy directly from Salim Group. Sources come from Wilmar and Bunge LC (previously IOI LC).</p> <p>9th April 2019 The CP issued a letter to Indofood on the termination of PT Salim Ivomas Pratama Tbk as a parent of PT Lonsum. The termination includes all subsidiaries and group members.</p> <p>Wilmar has updated that it has not bought from Salim since June 2017</p> <p>24th Sept 2018 Bunge LC has suspended suppliers from Salim Group</p> <p>31st May 2018 Field verification to take place on 4-8 June 2018</p> <p>30th Mar 2018 Secretariat to follow up with the Complainants and Company with the plans for verification.</p> <p>28th Feb 2018 RSPO secretariat to proceed with the field verification; provide a response to the Complainants and initiate the planning for the field verification.</p> <p>July 2017: Wilmar met with Indofood on 18 July 2017 to follow up on their progress in meeting the policy compliance. Indofood reaffirmed that they will be adopting the HCSA methodology and are fully committed to follow through the RSPO complaint mechanism.</p> <p>Indofood Agri Resource has also attended Wilmar's three-day training workshop focussing on the</p>	<p>Suspended</p> <p>Close</p>

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				<p>2014 included 1000 ha primary forest; satellite-based alerts suggest active clearance continuing in 2016</p> <p>Exploitation: child labour on plantation, paying below minimum wage and breaches of health and safety standards</p>		<p>implementation of Wilmar's Policy in 22- 24 July 2017 (refer here for latest update (N16))</p> <p>30th May 2017 We have engaged with Wilmar and IOI LC.</p> <p>IOI LC has temporarily suspended trading with Indofood.</p> <p>Wilmar has engaged with them and will be guided by the RSPO's decision on the matter</p> <p>Indofood Agri Resources has officially adopted a "No Deforestation, No Peat, No Exploitation" (NDPE) policy" in February 2017.</p>	
34	18th April 2017	<p>Goodhope Asia Holdings (Carson Cumberbatch PLC, Sri Lanka) # RSPO member</p> <p>#PT Agro Harapan Lestari is the managing agent for Goodhope</p>	<p>LDC GAR Bunge LC</p>	<p>The oil entered Olam's supply chain through GAR from Goodhope's subsidiary PT Agro Bukit and IOI LC. IOI LC source is RSPO MB certified</p> <p>PT Nabire Baru</p> <p>Deforestation that caused floods in Sima Village;</p> <ul style="list-style-type: none"> Irregularities including development without an Environmental Impact Assessment; 	<p>March 2017 - GP Palm Oil Alert</p> <p>The issues raised by GP is part of an order case found on RSPO Case Tracker</p>	<p>9th April 2019 Goodhope is not part of Olam's supply chain (ref: Dec 2018 mill list)</p> <p>Case handled by RSPO Complaints Procedure</p> <p>May 2018 Mediation process. RSPO Secretariat coordinating.</p> <p>Mar 2018 A discussion was held with LDC in Mar 2018 and they have confirmed that they do not buy from Goodhope.</p> <p>Latest progress by Goodhope available on its Mar monthly update</p>	Closed

Date	Indirect Supplier	Direct Supplier	Issues	Source	Action Taken & Outcomes
			<ul style="list-style-type: none"> Land grabbing and destroying the sacred place (Dusun Sagu) of the indigenous people of Yerisiam; Failure in following proper FPIC process; Excessive use of force and violence using of state security forces. 		<p>Olam will be guided by the decision of the RSPO on this matter.</p> <p>Feb 2018 GH publishes <u>monthly sustainability updates</u>. 10 monthly updates published thus far</p> <p>GAR grievance log of GH reviewed. Last update as of June 2017 on the above updates</p> <p>RSPO case tracker reviewed. CRU was appointed to conduct the said assessment. RSPO CP has met in Jan 2018. CRU pre-assessment report to be reviewed.</p> <p>8th Jun 2017 IOI LC has temporarily suspended purchase from Goodhope and its subsidiaries</p> <p>5th May 2017 GH announced its <u>Sustainability Policy</u></p> <p>28th Apr 2017 RSPO Precautionary Measure (Stop work order) issued</p> <p>19th Apr 2017 It was agreed that the initial assessment will be conducted by an independent third party. Conflict Resolution Unit (CRU) is appointed to conduct the said assessment (RSPO Case Tracker).</p> <p>18th Apr 2017 Olam has engaged with its suppliers on the report and require that they ensure all palm oil that is supplied to Olam is in compliance with Olam's Sustainable Palm Policy</p> <p>The case is looked at by the RSPO Complaints panel. Latest update is <u>available here</u></p>

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						We are also monitoring GAR's grievance log (ref: G23)	
35	30 th Mar 2018	TDM Berhad	Bunge LC Sime Darby Unimills	<p>Allegations:</p> <p>De-Gazettement of 4,515ha of land from Forest Reserve to Government Land in Terenggaunu, Malaysia which was given to TDM Berhad for oil palm plantation expansion</p>	<p>11th Jan 2018</p> <p>WWF: It is large-scale deforestation, says WWF-Malaysia</p>	<p>We are monitoring the updates from our suppliers to ensure that any development that takes place is done in accordance with the RSPO.</p> <p>April 2019 The concession was not given to TDM. GIS monitoring ongoing</p> <p>20th July 2018 No further update from Bunge LC</p> <p>Mar 2018</p> <ul style="list-style-type: none"> Bunge LC has engaged and socialised its Policy. They have committed to follow RSPO NPP policy Bunge LC to share with Olam its time bound plans for resolution 	Closed
36	13 th Sept 2018	Prosper Group – said to be linked to Bewani Oil Palm Plantations Limited (BOPPL)	Bunge LC ISF Wilmar	<p>Alleged clearance of an estimated 25,000 hectares of forests including an estimated 12,000 ha in the last four years since obtaining a lease for the palm oil development project in 2010.</p>	<p>The Chain: Bewani Oil Palm Plantation Divestment Increases Risks of Continued Deforestation in Palm Oil Supply Chains</p>	<p>April 2019 We engaged with our direct suppliers (Bunge and ISF) as a result of our due diligence. Following this engagement and their investigations undertaken, Bunge and ISF have suspended Prosper Group. Bunge has suspended Prosper in Oct 2018</p> <p>Bunge's investigation has found direct family affiliations to both Prosper/Far east Holdings and the Bewani Group</p> <p>13th Sept 2018 Olam has reached out to its direct suppliers all of whom have confirmed with Prosper Group that BOPPL is not linked to them.</p>	Suspended by our direct suppliers

