Olam Grievance Monitoring Log

Updated as of 30th Mar 2020

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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	Strikes called by self-	Self-reported	25 TH Mar 2020	Monitoring
	2018	elected workers'		12 meetings were held with delegates in 2019 with various actions agreed by both parties for	implementati on of action
		representative from Mouila and key issues raised		implementation. These are in various stages of implementation.	plan
		including:		4 th Oct 2019	pian
				A meeting was held in Sept 2019 with discussions on progress made	
		1. Non-renewal of		44.4. !! 0040	
		temporary contract		11 April 2019 Discussion with workers' representative from Mouila was conducted on 28 Nov 2018. All	
		workers. 2. Employment of		additional demands were discussed, and minutes were recorded and signed for, and	
		foreign workers		communicated with all workers through their representatives and with the Labour Department.	
		3. Additional demands		Every month, we hold a meeting with our worker representatives as well as representative(s)	
		on top of the		from the Labour Department to update on the status and progress of the agreed action items.	
		Collective Agreements made in		Last meeting was conducted on 28 Mar 2019.	
		Feb 2017		Summary of the sequence of the event as below:	
				OPG began discussion on 29 th September with employee representatives	
		•		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:	
				 a. The on-going discussion were halted by some employees who sought to change their representation 	
				b. Strikes on 14 th Oct.	
				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.	
				Full statement available here	
				Full Statement available <u>nere</u>	

OLAM'S DIRECT SUPPLIERS CASES HANDLED BY THE RSPO

Da	ate	Direct Supplier	Allegations	Source	Action Taken & Outcome	Status
2 25 Ma 20		Golden Agri- Resource s Ltd (GAR)	GAR, through its subsidiaries located in Central Kalimantan, operate its plantations with permits which never had the force of law; and GAR through its employees have been involved in the payment of bribes to provincial officials in Central Kalimantan	RSPO Complaints	Mar 2020 The case has been logged by the RSPO on 13 th Mar 2020. Updates are available at this link	Investigation
3		Musim Mas (MM)	1. Land fires occurred in August 2019 in the conservation area within the HGU covering an area of approximately 12 hectares; 2. MM blocked river flow within their HGU damaging rivers and altering their function; 3. Numerous community-owned plantations and public cemeteries within MM HGU area have yet to be enclaved; 4. MM planted on peatland within its HGU area; 5. MM planted on the river-course areas of Sungai Bengkarai, Sungai Air Hitam, Sungai Napoh, Sungai Peragaian, Sungai Merbabu, Sungai Batang Merah although there is a signage indicating that these are considered as conservation areas; and 6. MM did not respond to the Complainant and community grievances and suggestion.	RSPO Complaints	Mar 2020 The case has been logged by the RSPO on 24 th Mar 2020. Updates are available at this link	Investigation
4 Ma	lar 020	PRESCO PLC	Allegation of entry by Presco Plc.to Ovre-Eku Land	RSPO Complaints	Mar 2020 Updates to the case is available on the RSPO at this link	Investigation

	Date	Direct Supplier	Allegations	Source	Action Taken & Outcome	Status
5	17 th May 2017		A series of reports from Chain Reaction Research and Greenpeace, plus a case investigated by RSPO. Allegations: FGV in Kalimantan's concession had cleared 1600 Ha peat forest. On the 26th of July 2015, WSJ ran an article by Syed Zain AI – Mahmood alleging of breached labour conditions in its plantations. The allegations are: That forced labour is being used The workers are not paid minimum wages. That their health and working conditions are	Grant & Eisenhofer ESG Institute Mighty Earth Rapid Response 9 Sept 2018: Greenpeace Final Countdown Mar 2018: Greenpeace's Report "Moment of Truth" Chain Reaction	25 th Mar 2020 Olam is maintaining its suspension of FGV. 23 rd Jan 2020 Olam takes note of the the CP's decision letter dated 13 th Jan 2020 in which it found that the results from 6 verification audit reports were unsatisfactory. As a result, CP found FGV to be in non-compliance of the CP's decision and has instructed the RSPO to re-suspend FGV's • P&C certificate for Kilang Sawit Serting and its supply base • All certification process of each uncertified management unit within FGV We also take note of FGV's response here and that it will be appealing the decision made by the CP. Following the above decision, Olam has suspended trade with FGV and have informed FGV of this decision. Dec 2019 Olam met with FGV to discuss our Policy and FGV commitments	Status Suspension.
			neglected and Their employers withheld their passports.	Research (Jan 2018, May 2017) RSPO Case Tracker (FGV) Chain Reaction Research report titled, "The Chain: EXCLUSIVE - FGV Risks Supply Chain Exclusion Over Repeat Offense s" (18 April 2017) July 2017: WSJ - Palm-Oil Migrant	July 2019 Olam met with FGV new head of sustainability and the team and discussed among others 1. FGV's latest sustainability commitments 2. Updates on the two cases that are captured in the RSPO Complaints Panel 5th Aug 2019 On the allegations of forced labour and non-payment of minimum wages, the RSPO Complaints has closed the case and monitoring of FGV's action plan by RSPO's Investigation and Monitoring Unit will continue until 31st Jan 2020 2nd Aug 2019 FGV has revised its Sustainability Policy on 29th May 2019. The Policy applies to the whole FGV Group including its listed and	

Date Direct Supplier	Allegations	Source	Action Taken & Outcome	Status
		Workers Tell of Abuses on Malaysian Plantations July 2015: RAN - Joint NGO Statement: Modern Day Slavery Found on RSPO Member Felda Global Venture's Plantations	non-listed subsidiaries for which FGV has management control. The updated Policy also now extends to FGV's contractors and suppliers (it previously did not) The Policy is available - here FGV has adopted a Supplier Code of Conduct in April 2019 FGV has adopted its Guidelines and Procedures for the Responsible Recruitment of Foreign Workers here FGV's Second Quarterly Progress Report - http://www.fgvholdings.com/wp-content/uploads/2019/07/FGV-Action-Plan-and-2nd-Quarterly-Progress-Report-to-RSPOwebsite.pdf Grant & Eisenhofer ESG Institute to the United States Customs and Border Protection (CBP) response - http://www.fgvholdings.com/fgv-holdings-berhads-response-to-the-petition-by-grant-eisenhofer-esg-institute/ July 2019 Olam met with FGV new head of sustainability and the team and discussed among others 3. FGV's latest sustainability commitments 4. Updates on the two cases that are captured in the RSPO Complaints Panel 28 Nov 2018 RSPO Complaints Panel released the findings from its investigation as well as independent verification done here In summary: 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)	

	Date	Direct Supplier	Allegations	Source	Action Taken & Outcome	Status
6	Dec 2019	First Resources PT Ketapang Agro Lestari	Deforestation – 8 ha	Mighty Earth Rapid Response 21	 25th Mar 2020 We have requested for a copy of the report from FR for confirmation of the area. 8 Jan 2020 Our supplier has reverted with the following: HCS assessment has been conducted for PT Ketapang The land clearing identified was conducted on non-HCS area by FR and also the community We have asked confirmation on the HCV status of the area. 	Investigation
7	26 th Nov 2019	Sarawak Oil Palm allegedly linked to Shin Yang Dataran Sekeping Sdn Bhd	Deforestation – 4 ha	Mighty Earth Rapid Response Report 20	Jan 2020 Olam does not buy from SOP/Shin Yang 26 th Nov 2019 Olam does not receive any oil from Shin Yang but from SOP. 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 and supplies from SY are not in Olam's supply chain. On the case, SOP has informed us that clearing has happen in Adam Oil Palm Estate was encroachment by local communities to plant paddy for self-consumption. This was verified through an on-site engagement conducted on 10 th Nov 2019 where the management of Dataran Sekeping showed the concession boundary local community. Both the company and the community have come to an agreement	No buy
8	30 th Sept 2019	Shin Yang/ Sarawak Oil Palms Bhd Shin Yang OP Planting Area (LPF/0018) Bunge	Deforestation – 127 ha	Mighty Earth Rapid Response 18	Jan 2020 Olam does not buy from SOP 19 th Nov 2019 Bunge engaged with SOP and requested them to require SY Group to issue a stop work, pending next course of action. Bunge has suspended SOP 1st Oct 2019 Olam does not receive oil from Shin Yang but from SOP.	No buy

	Date	Direct Supplier	Allegations	Source	Action Taken & Outcome	Status
					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 and supplies from SY are not in Olam's supply chain.	
					We are awaiting a response from SOP on the allegations	
9	1st Oct 2018	Wilmar	Allege buying from groups that are deforesting and land grabbing	Sept 2018: Greenpeace - The Final Countdown	 26th Mar 2020 We continue to monitor the implementation of Wilmar's action plan. In addition, we have asked Wilmar to apply its NDPE Policy to companies which are possibly clearing for non-palm related as long at the company is a supplier to Wilmar. 4th Oct 2019 Wilmar continues to implement its action plan as well as monitoring. 7th Dec 2018 Wilmar has issued a joint statement with Aid Environment as well as supported by Unilever and Mondelez on the following: • 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 9th Nov 2018 Wilmar published its two-year progress report covering 	Monitoring Implementation of Action Plan
					Olam has engaged with Wilmar and part of that engagement includes meeting with Wilmar on 11 th Oct 2018 Key updates are:	
					1. Wilmar will develop a system that will accurately monitor land use change across countries we source palm oil from.	

Date	Direct Supplier	Allegations	Source	Action Taken & Outcome	Status
				 The system will use near real-time satellite monitoring that will provide independent verification of compliance with their NDPE policy. The output of the monitoring will be shared independently Monitoring will cover both areas that supply to Wilmar and areas linked to its suppliers. Timeline of action is available here 	

OLAM INDIRECT SUPPLIERS

	Date	Indirect Supplier /Supply Chain Link	Direct Supplier	Allegations	Source	Action Taken & Outcomes	Status
10	24 th Jan 2020	Incasi Raya Group PT Makmur Agro Lestari	Bunge	Deforestation – 61 ha	Mighty Earth Rapid Response 23	25 th Mar 2020 We are still awaiting for an update from Bunge on this. 24 th Jan 2020 This Group had recently entered our supply chain, We are awaiting for an update from Bunge.	Investigation
11	24 th Jan 2020	Bumitama Group PT Andalan Sukses Makmur	Wilmar	Deforestation – 129 ha	Mighty Earth Rapid Response 23	Mar 2020 Wilmar updated stated that Bumitama conducted ground checking and verified 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 are a part of the set-aside areas of 2,500 hectares (about 36% of PT ASMR's permit) that were excluded from the company plantation development plans and were set-aside for conservation based on the rapid HCS assessment and peat delineation study conducted in April 2014 (refer to 12 September 2014. Announcement: http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7).	Investigation

						The fires were tackled by our Bumitama's fire- response personnel. Two teams of 24 men were dispatched to the site, equipped with pumps and water hoses to douse the flames. However, the forest terrain, lack of access roads and peat soil made it very difficult extinguish. Once put out, both incidents were recorded and reported accordingly to relevant local authorities, as well as to the RSPO under the hotspot monitoring scheme. 24 Jan 2020 We have reached out to Wilmar and are waiting for a response	
12		Sampoerna Agro PT Usaha Agro Indonesia	Bunge	Deforestation – 84 ha	Mighty Earth Rapid Response 22	25 Mar 2020 We are still waiting for a response from Bunge 6 Jan 2020 Olam does not receive oil from the mill in question but receives supply through Bunge from the parent company. We have reached out to our direct supplier and are waiting for a response	Investigation
13	6 Jan 2020	Rimbunan Hijau Timrest Sdn Bhd	Wilmar	Deforestation – 15 ha	Mighty Earth Rapid Response 22	25 th Mar 2020 Wilmar has confirmed that land clearing was not conducted by the company, it happened outside their concession boundary. 6 Jan 2020 Olam does not receive oil from the mill in question but receives supply through Wilmar from the parent company. We have reached out to our direct supplier and are waiting for a response	Investigation
14	6 Jan 2020	Rimbunan Hijau Timrest Sdn Bhd	Wilmar	Deforestation – 12 ha	Mighty Earth Rapid Response 21	25 th Mar 2020 Wilmar has confirmed that land clearing was not conducted by the company, it happened outside their concession boundary.	Investigation

						6 Jan 2020 Olam does not receive oil from the mill in question but receives supply through Wilmar from the parent company We have reached out to our direct supplier and are waiting for a response	
15	6 Jan 2020	Dhanistha Surya Nusantara PT Sabhantara Rawi Sentosa	Bunge, IOI, First Resources, Sime Darby	Deforestation – 146 ha	Mighty Earth Rapid Response 21	25 th Mar 2020 6 Jan 2020 Olam does not receive oil from the mill in question but receives supply from the parent company We have reached out to our direct supplier and are waiting for a response	Investigation
16	6 Jan 2020	Global Enterprise PT Bulungan Surya Mas Pratama	Bunge	Deforestation – 17 ha	Mighty Earth Rapid Response 21	24 th Mar 2020 We are still waiting for an update from Bunge 6 Jan 2020 Olam does not receive oil from the mill in question but receives supply through Bunge for Global Enterprise Group. We are waiting for an update from Bunge	Investigation
17		Makin Group PT Cipta Karsa Kahuripan	Bunge	Deforestation – 79 ha	Mighty Earth Rapid Response 21	24 th Mar 2020 We are still waiting for an update from Bunge 6 Jan 2020 Olam does not receive oil from the mill in question but receives supply through Bunge from Makim Group. We are waiting for an update from Bunge	Investigation
18	26 Nov 2019	IJM Group PT Primabahagi a Permai	Bunge	Deforestation – 12 ha	Mighty Earth Rapid Response 20	24 th Mar 2020 We are still waiting for an update from Bunge on this case 26 Nov 2019	Investigation

	ord					Olam does not buy from the mill in question but receives supplies through Bunge for IJM Group. We are waiting for a response from our supplier.	
19	3 rd Oct 2019	Tunas Baru Lampung/Su ngai Budi allegedly linked to Serbahuta Jaya	Permata Hijau Group/Virgoz, GAR, Musim Mas for Serbahuta Jaya	Deforestation – 216 ha	Mighty Earth Rapid Response Report 20	25 th Mar 2029 We are still waiting for an update from our suppliers 26 th Nob 2019 We are waiting for an update from our direct suppliers	Investigation
20	3 rd Oct 2019	Rimbunan Hijau RH Plantation (Selangor Estate)	Wilmar Bunge Sime Darby	Clearance prep/Stacking – 37 ha	Mighty Earth Rapid Response 12, 17, 18, 19	25 th Mar 2020 We have informed our suppliers that any clearing by a suppliers regardless if its palm or non-palm related should be investigated and acted upon. 19 th Nov 2019 Trade partners contacted by Bunge confirm that clearing is non palm related 3 rd Oct 2019 Olam is awaiting a response from our direct supplier	Investigation
21	3 rd Oct 2019	AlamBumi Group AlamBumi Palm Oil Mill Sdn Bhd	Wilmar Bunge	Deforestation – 6 ha	Mighty Earth Rapid Response 19	19 th Nov 2019 Bunge is investigating its links to the company 3 rd Oct 2019 Olam does not buy directly from the mill but receives supplies associated with the parent company. We are awaiting a response from our direct supplier.	Investigation
22	30 th Sept 2019	Rimbunan Hijau: Erajaya Synergy Sdn Bhd (Lassa division, part of LPF/0029) (Rimbunan Hijau)	Wilmar Sime Darby Bunge	16 ha of peat development	Mighty Earth Rapid Response 18, 19	25 th Mar 2020 Wilmar has updated that the clearing was non-palm related in addition 4ha was cleared by the community for planting of pineapple. We have asked all our suppliers to investigated all clearing regardless if its palm or non-palm related. 19 th Nov 2019 Sime Darby is initiating engagement with its traders on this. The traders have relevant NDPE policies in place. Bunge's trade partners have confirmed that its not palm related.	Investigation & Monitoring

						1st Oct 2019]	
						Olam does not buy from the company in question but receives supplies associated with the parent company.	
						We are awaiting an update from Wilmar	
23	30 th Sept 2019	Rimbunan Hijau: Woodijaya Sdn Bhd (Lot 197)	Wilmar	4 ha of peat development	Mighty Earth Rapid Response 18	The clearance was done on NCR (Native Customary Right) land 19 Nov 2019 Bunge's trade partners have updated that this is not palm related clearing. Sime Darby is initiating engagement 1st Oct 2019 Olam does not buy from the company in question but receives supplies associated with the parent company.	Investigation/ Monitoring
24	30 th Sept 2019	Syarikat Samling Timber Sdn Bhd (LPF 0014)	Wilmar	Peat development – 6 ha	Mighty Earth Rapid Response Report 17	We are awaiting an update from Wilmar 25th Mar 2020 Wilmar has updated that the clearing was non-palm related. We have asked all our suppliers to investigate all clearing regardless if its palm or non-palm related. 1st Oct 2019 This is a timber company which Olam does not source from but receives supplies from the mill associated with the parent company Samling We are awaiting feedback from Wilmar	Investigation
25	30 th Sept 2019	Woodman Group Adong estate, part of LPF 0004	Wilmar Bunge Sime Darby	Deforestation	Mighty Earth Rapid Response Report 17 & 18	25 th Mar 2020 Wilmar has updated that the clearing was non-palm related. We have asked all our suppliers to investigate all clearing regardless if its palm or non-palm related. 30 th Sept 2019	Investigation

26	30 th Sept 2019	Woodman Group Liku estate part of LPF 0004	Wilmar Bunge Sime Darby	Deforestation	Mighty Earth Rapid Response Report 17 & 18	Olam does not buy from the company in question but receives supplies associated with the parent company. We are awaiting an update 25 th Mar 2020 Wilmar has updated that the clearing was non-palm related. We have asked all our suppliers to investigate all clearing regardless if its palm or non-palm related.	Investigation
27	30 th Sept 2019	Woodman Group Baram Estate, part of LPF/0004	Wilmar Bunge Sime Darby	Deforestation – 1 ha Peat development – 168 ha	Mighty Earth Rapid Response 18	25 th Mar 2020 Wilmar has updated that the clearing was non-palm related. We have asked all our suppliers to investigate all clearing regardless if its palm or non-palm related.	Investigation
28	Aug 2019	CB Industrial Product Holding / Jhonlin Group	Bunge	65 ha's deforestation in PT Kurun Sumber Rezeki concession	Mighty Earth Rapid Response Report 17	Mar 2020 We are awaiting for feedback from Bunge 2nd Aug 2019 Olam does not buy from PT Kurun Sumber Rezeki but receive supplies associated with the Jhonlin Group. We are awaiting feedback from Bunge	Investigation
29	2 nd Aug 2019	Kencana Agri Ltd: PT Agro Sawit Mas Lestari	Bunge	4 ha's of deforestation	Mighty Earth Rapid Response Report 17	Mar 2020 We are awaiting for feedback from Bunge 2nd Aug 2019 Olam does not buy from PT Agro Sawit Mas Lestari but receive supplies associated with the parent company Kencana Agri Ltd. We are awaiting feedback from Bunge	Investigation
30	24 th June 2019	Shin Yang LPF 0018	Sarawak Oil Palm (allegedly linked) Sime Darby	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	Jan 2020 Olam does not buy from Sarawak Oil Palm November 2019 Bunge has suspended Shin Yang	No buy

	1			1		28th June 2019	
			Bunge			SOP has clarified with us on 5 th of April 2019 as well	
			Builge			as again on 27 th May 2019 that SOP and SY are	
						separate legal entities and supplies from SY are	
						not in Olam's supply chain.	
						The in Claim's Supply Chain.	
						We have shared the report with SOP.	
31	24 th	Genting	Bunge	Deforestation	Mighty Earth	Mar 2020	Stopwork
	June	Group		March 17 – May 15 2019 –	Rapid Response	Bunge received information from Genting that HCV	order
	2019	DT 0:		deforestation of 175 ha's in PT	14,15,16,17	and HCS assessments are underway. Further	
		PT Citra Sawit		CSC concession		engagement is ongoing.	Monitoring
		Cemerlang				Aug 2019	
		Cernenariy				Stop work order in place	
						one non order mercan	
						July 2019	
						Verification results for sharing has been approved	
						07 1 0040	
						27 June 2019 Bunge has shared with us a letter from Genting	
						Plantations dating 2 nd 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	
						07.1 0040	
						27 June 2019 Bunge has shared with us a letter from Genting	
						Plantations dating 2 nd 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.	
32	8 April	Double	Wilmar	Allege conflict with indigenous	Mighty Earth	March 2020	Suspended
	2019	Dynasty/ Radiant	Bunge Sime Darby	Penan and Berawan communities as a result of development in the	Rapid Response	Wilmar has updated that in July 2019, DD Group has	Bunge
		Lagoon	(Wilmar does	concessions		met all the criteria stipulated in the re-entry	Wilmar has
		Mill: DD	not source from Radiant			criteria, including their commitment to the	lifted suspension
		POM	Lagoon, but their supplier			Development of Recovery Plan for Non-	in July 2019
			DDPOM is			Compliant Land Clearing to NDPE policy at group	Engagement
			associated with Radiant			level incurred from January 2016 onwards. Based on	with Sime Darby

Lagoon as they both have	the detailed review of documentation, reports and
a common key shareholder)	letter of commitment from DD Group, the Wilmar
Silateriolder)	Suspension Committee have lifted the suspension on
	the DD Group in July 2019. Wilmar is actively guiding
	DD Group in the development of the recovery plan
	and monitor DD Group's activities on monthly
	basis through our Supplier Group Compliance
	<u>Verification programme</u> .
	August 2010
	August 2019
	 Sime Darby: Sime Darby has updated us that an 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 Carbon Stock Assessments. 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.
	July 2019 Double Dynasty is found to be non-compliant to the Bunge's NDPE policy. Bunge will no longer accept oil from this supplier.
	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

33	30 th	ТН	Wilmar	Clearance of forest, including	July 2018	 We have reached out to Wilmar and have the following update: 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. 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. Olam does not buy from the mills in question but we 	Suspended
33	Mar 2018	Plantation Berhad (THP) PT Persada Kencana	Bunge LC Musim Mas IOI	 Clearance of forest, including primary forest, in Papua Development on peatland ME Rapid Response 18 – 4 ha peat development 	The Chain: TH Plantations' Stop Work Order Violated by PT Persada Kencana	receive oil from mills owned by the parent company Tabung Haji. Following various reports and THP withdrawal from the RSPO we have asked to suspend THP from our supplies as well as provide us updates on THP progress.	Suspended

Oct 2019: Bunge: suspension of Tabung Haji Prima, a Prima's subsidiary of Deforestation remains ΤH Plantation Mighty Earth TH Pelata Meludam (ME RRR 18) Aug 2019, Musim Mas: TH Plantations said that the Berhad Rapid Response 5, 14, 15, 18 land-clearing is not within their estate and is located Ladana outside TH Pelata Meludam Sdn Bhd's concessions. 2016 Tabung Haji TH Plantations have also provided supporting (ME RRR) Greenpeace: evidence via satellite imagery to corroborate their **Deadly Trade-off** statement. Musim Mas have verified the evidence Hvdroflow IOI's Palm Oil provided and confirmed that the land-clearing falls Supply and its Sdn Bhd outside their concessions (ME RRR) Human and Environmental Ladang Tabung Haji (ME RRR) TH Pelata Cost June 2019, Musim Mas: TH Plantations confirmed Meludam that the estate mentioned, Ladang Tabung Haji no Sdn Bhd longer belongs to THP. It was sold to another (ME RRR 18 company based in East Malaysia in 2008. Sept 2019) Hydroflow Sdn Bhd (ME RRR) May 2019, Musim Mas: TH Plantations has verified the allegations and confirmed that the contended area is outside of Hydroflow's concession boundaries. They believe it belongs to a neighbouring estate and that Mighty Earth has mistakenly tagged it as part of Hydroflow's concession. To further validate their statement, TH Plantations has confirmed they have issued a stop-work order on Hydroflow since September 2018. Since then, no heavy machinery has been placed within the estates and no funds have been channeled to them for any further development. 3 July 2019 According to Wilmar's grievance log viewed on 3rd July - PT PKP continues to cease all activities on the ground 17 May 2019

				We have written to Wilmar for an update on THP. From the Grievance log, we have the following update: 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. Wilmar held a meeting with the supplier on 12 th Sept 2018. 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	
O.4. Ooth	B 10 A	1; 07th 0 1004		Mar 2018 – 24 th Sept 2018 • Has been suspended by Bunge LC	
34 30 th Mar 2018	(sourcing from Grou Suppl Musim Mas and GAR)	up and its Palm Oil Human a	5: Trade-off: IOI's Supply Chain and its nd Environmental	March 2019 Eagle High is committed to maintain the moratorium. 25 th July 2018 A moratorium remains in place. FPIC training has taken place. FPIC is still on hold while capacity of the team is increased. 31 st May 2018 FPIC exercise will commence year end, to give time to increase capacity of team 30 th Mar 2018 Bunge to update Olam on the latest development since the FPIC training and result of field visit in Oct 2017 Dec 2017	Moratorium

35	30 th	PT Kahayan	Bunge LC	April 2019: ME Report 14 reports	Mighty Earth	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 Mar 2020	Moratorium
	Mar 2018	Agro Plantation (PT KAP) (Anglo Eastern Plantations – "AEP")	(buying from GAR and Wilmar) Wilmar Musim Mas	Allegations by ME regarding PT Kahayan Agro Plantation (PT KMP) reported as owned by Anglo Eastern Plantations 1. Deforestation between October 16, 2016 and September 26, 2017 of an estimated 420 hectares including clearing of Bornean orangutan habitat 2. Land conflicts and licensing issues	Rapid Response reports 1, 14, 15, 18, 19, 20, 23, 24, 25	AEP have published a commitment to no new development on HCS, HCV and Peat in their new Sustainability Policy in June 2019. Anglo Eastern has completed the peer review for the HCS report and land clearing identified in ME 14 is located outside the identified HCS area. Report is available - here 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 The draft HCS assessment report was shared with Wilmar in October 2018. The report is undergoing peer review. Dec 2018 Ongoing engagement. AEP plans to establish NDPE policy in 2019 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. October 2018 Assessment results were being socialized to community and employees. AEP reiterate commitment to HCS/HCV conservation.	in place. Monitoring implementati on of action plan through our direct suppliers

						Bunge LC is monitoring the milestones. Bunge LC to provide Olam with further details. 30 th 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	
36	30 th Mar 2018	Triputra Agro Persada	Bunge LC	Allegations: 1. Lack of NDPE Policy 2. Deforestation Conflict with local people and community	Chain Reaction Research - NEW ANALYSIS: Palm Oil Producer Triputra Agro Persada's Lack Of Transparency And Responsibility Puts Rapid Growth At Serious Risk	Nov 2019 Bunge trading partner have confirmed that the clearing in PT Putra Katingan is non-palm related April 2019 Clearing was done in according to HCV and HCS assessment. The assessment reports will be shared. Internal monitoring has not identified any further clearing. Monitoring for continue for 12 months was the date the grievance was raised by Bunge LC 28 Dec 2018 HCV and HCS assessment have been completed 24 th 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 20 th July 2018 No further update from Bunge LC 31 st 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. 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,	Monitoring

						zero burning, & moratorium map on peat & primary forest area, along with aiming to meet globally acknowledged sustainability standards. 30th Mar 2018 Bunge LC to provide Olam an update.	
37	21st Nov 2017	Samling Group Samling Reforestatio n (Bintulu) Sdn Bhd (Sarawak) Samling Jelalong LPF 0007 (Mighty Earth Rapid Response 15,16)	Sime Darby LDC (suspended supply from Samling) Bunge LC – Suspended supply from Samling	 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 cleared in the LPF/006 Samling-Lana concession Company does not have a 'no deforestation, no peat, no exploitation' policy Indonesian concessions do not appear to have been certified by the Indonesian Sustainable Palm Oil (ISPO 	June 2019: Mighty Earth Rapid Response 11, 13, 15, 16, 17, 18 Nov 2017: Greenpeace Palm Oil Alert (Nov 2017)	Wilmar has updated that clearing in ME Report 13, 15, 17 are not palm related. Olam has asked that all clearing to be investigated. Wilmar has also updated that the area in Report 18 is not within the supplier's concession as their location permit (Izin Lokasi) for that area had expired. 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. Aug 2019 Bunge has suspended Samling 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). 31st Jan 2019 Bunge has suspended supplies from Samling and have informed its trading partners accordingly. 26th July 2018 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.	Monitoring implementati on of action plan through our direct suppliers Bunge and LDC have suspended supply

[6. Deforestation: Clearance of	31 st May 2018
	natural forest in North Kalimantan, PNG and	LDC - Samling no longer in the supply chain of LDC.
	Myanmar	30 th Mar 2018
	7. Exploitation: Development	Wilmar
	without Free, Prior and	The company has divested from PNG operations
	Informed Consent (FPIC) of affected communities and human rights violations	 No land clearing activity for palm. Wilmar will be visiting Indonesia for verification (updated) During the field assessment, it was verified that
8	B. Use of fire: Apparent use of fire for clearing land	there was no breach of Wilmar's NDPE policy. Specifically:
		 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
		LDC Call with LDC on Samling group. Samling is not
		responsive to emails from LDC. LDC will provide time bound plan.
		Samling Group supplies Olam through Wilmar and LDC. LDC sources the oil from GAR and Sunfield
		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 (<u>ref here</u>).
		Wilmar and LDC to submit their time-bound grievance plan for Samling.
		Nov 2017

39	30 Mar 2018	Rimbunan Hijau Gilford Ltd, a subsidiary of Rimbunan Hijau (PNG) Group Jaya Tiasa Holdings Bhd (Rapid Response 12)	Wilmar Bunge Sime Darby	Social and Labour issues highlighted by Sarawak Report (Jan 2020) Allege deforestation in PNG by Gilford Ltd.	20 Jan 2020 - Sarawak Report 7 Jan 2020 - Sarawak Report Mighty Earth Rapid Response 12 Aug 2017 Global Witness: Stained Trade	with Samling and will update us on the outcome 28 Jan 2020 We have written to Wilmar on Rimbunan Hijau in particular the allegations made by Sarawak Report regarding labour and land grabs. 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 Hijnau. 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
	May 2018	(Jan 2019)		-	Mighty Earth Rapid Response 21	PT Agro Sarimas Indonesia (PT ASI) confirms alleged deforestation was outside the PT ASI	implementai

LDC (2018) GAR (2018)	(• E v	Ilegal FFB sourced from Tesso Nilo National Park "TNNP") Deforestation on peatlands with moderate to deep peat. Landsat 8 images dated 19 Dct 2017 indicated land	May 2018 Eyes on the Forest – Enough is Enough 2015: Eyes on the	concession. (see map overlays and PT ASI's official response) 2nd Aug 2019 For the latest update please refer to https://www.apicalgroup.com/sustainability/grievance s/tnnp-eof-2018/	on of action plan
	C A 1 tl	clearing in PT Triomas during Aug 2016 – Oct 2017 totalling 110 ha. No land clearing in he same period from PT Jniseraya	area with the aim of developing a traceability pilot	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	
				Sime Darby Unimills has confirmed that PT Triomas & PT Uniseraya are not within their supply chain.	
				January 2019: 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.	
				November 2018 Our suppliers are having ongoing engagement via ART programme and with EOF/WWF	
				13 rd Sept 2018 GAR had a meeting with EOF on 24 th July to discuss the report and plan for a landscape approach	
				Bunge LC updated that a joint statement will be by stakeholders on updates.	
				20 th 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	

T T	
	GAR has conducted site visits to 4 mills under its Aggregate Refinery Programme and grievance management between 2015- 2018
	31st May 2018 The following Companies and supplying mills were listed in the report:
	GAR PT Tri Bukti Sarimas 1, Bukit Payung 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.
	LDC: PT Berlian Inti Mekar Rengat LDC will investigate and update Olam
	Bunge LC (100% purchased as RSPO MB oil) • 2000 smallholders from the Tesso Nilo National Park were relocated back in 2016. Bunge is checking with its suppliers and will update Olam.
	Mills listed area: 1. PT Berlian Inti Mekar Rengar 2. Pt Citra Riau Sarana 1 (Teso Satu) 3. Pt Citra Riau Sarana 2 (Teso Dua) 4. Pt Citra Riau Sarana 3 (Teso Tiga) 5. Pt Gemilang Sawit Lestari 6. Pt Indosawit Subur Ukui 2
	7. Pt Makmur Andalan Sawit 8. Mitra Unggul Pusaka Segati

	9. Peputra Supra Jaya 10. Putera Keritang Sawit
	11. Rigunas Agri Utama Bunga Tebo 12. Rigunas Agri Utama Peranap
	13. Sujih Riesta Jaya
	14. Sumbar Andalas Kencana Muara Timpeh
	15. Swakarsa Sawit Raya
	16. Tri Bakti Sarimas 1 (Bukit Payung)
	17. Pt Tri Bakti Sarimas 2 (IBUL) 18. Panca Eka (PT Kebun Pantai Raja, PT
	Triomas FDI, PT Uniseraya)
	Sime Darby (Unimills) – RSPO MB
	Pt Inti Indosawit Subur (RGE/Asian Agri) Ukui 1
	Pt Inti Indosawit Subur (RGE/Asian Agri) Ukui 2
	Overall response from Wilmar
	(Listed mill not in Olam's supply chain)
	Illegal oil palm operators not being listed by the report
	List requested following a meeting held on 16 th
	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.
	Apical
	Listed mill <i>PT Mitra Unggul Pusaka</i> not in Olam's
	supply chain

CLOSED CASES

Closed Cases: Olam

	Date Filed	Business	Issue	Source	Action Taken & Outcomes Statu	s
40	20 th Sept	Olam Palm	Report and petition from	Self-registration by Olam	There has been zero deforestation of lands around Nanga and Close	d
	2019	Gabon	World Rainforest		Ferra. The area is predominantly grassland and all forests and	
			Movement and Muyissi	Mar 2020	other high conservation value (HCV) lands (including HCV	
			Environment	<u>Mongabay</u>	savannahs and wetlands) are being protected as part of our	
					commitment to conserve all HCV areas in our palm	
			The petition makes three	Apr 2020	concessions.	
			allegations:	Food Navigator	There has been no "land grabbing" by Olam, either in Nanga and Ferra or elsewhere in Gabon. Both communities	
			1) Olam has deforested		participated in a fully inclusive process to ensure their Free,	
			within traditional areas of		Prior and Informed Consent (FPIC) to plans for agricultural	
			the communities of Nanga		development in their area. Regarding the specific area on the	
			and Ferra to create palm		left bank of the Dola river mentioned in the petition, none of this	
			plantations;		area has been developed for palm. Thousands of hectares of	
			plantations,		savannah and forest on the left bank of the Dola river are	
			2) We have expanded into		permanently protected. The communities have free access to all	
			the village lands on the left		the areas to carry out their traditional activities.	
			bank of the Dola river		3. We are on track with delivery of the projects agreed with the	
			against the consent of the		community to support people living in the area. This includes	
			communities;		improving local education facilities and building houses for	
			communities,		teachers; providing better access to healthcare through a new	
			3) We have not fulfilled our		dispensary and houses for nurses, creating local employment,	
			promises to provide		and the installation of hydraulic pumps to deliver fresh water.	
			1 .		and the installation of hydraulic pumps to deliver hesh water.	
			support to these villages.		The claims in this petition have already been rejected by	
			The report alleged Olem		ROSCEVAC, a NGO network based in Gabon, in national and local	
			The report alleged Olam		media.	
			breaches no deforestation		media.	
			commitment, hire logging		Cinco January 2017, we have unheld a maretarium an any further	
			companies to degrade		Since January 2017, we have upheld a moratorium on any further	
			forest and disrespect free		land conversion for palm development.	
			prior informed consent.		Olam also never engaged in any logging activity in Gabon.	
					All our development is complying to the RSPO new planting	
					procedures with fully inclusive process with communities to ensure	
					·	
					Free, Prior and Informed Consent (FPIC) and public consultation	

	Date Filed	Business	Issue	Source	Action Taken & Outcomes	Status
					prior to any activity and maintains ongoing, regular dialogue with 60	
					villages in proximity to our plantations.	
					Please read our full statement on this <u>link.</u>	
41	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	30 th 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
42	12 th Dec 2016	Olam International	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. 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: 1. It was acknowledged that the last agreement had been respected and that significant progress has been made across the board. 2. Olam and Mighty Earth agreed on a number of new commitments demonstrating their shared interest in developing sustainable agriculture 3. 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
				 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. 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 	
				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	
				24 th July 2017:	
				Update from Olam International and Mighty Earth on engagement process following visit to Olam palm plantations in Gabon	
				 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. Visited a small part of the 18,000 ha conservation setaside 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
				 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. 	
				 Feb 2017 Olam published its updated Palm Policy Statement - Olam and Mighty Earth agree to collaborate on forest conservation and sustainable agriculture in highly forested countries 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 	
				party paint oil suppliers and protects the altorythity 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
					Work with the Gabonese government, civil society, and international experts and stakeholders to advance conservation and responsible development.	
					12 nd 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. Full response submitted by Olam on 12 December. See also Press Release; Building a Sustainable Palm Oil Response from the Republic of Gabon Other Policies under review.	
	444				Contacted third party suppliers in question – see below.	
43	4 th Dec 2017	Olam International	Three reports from Greenpeace and Forest Heroes assess corporate commitments across the industry. Areas include: 1. Policy robustness 2. Supply chain data transparency 3. Monitoring of supply chain	Mar 2018 Greenpeace's Report "Moment of Truth" Nov 2017 Greenpeace's Report "Still Cooking the Climate" Oct 2017 (data from 2016) Forest Heroes report: Green Cats: Scoring Palm Oil and Soy Companies on Forest Polices and Transparency	Olam responded with a <u>public statement</u> to the Greenpeace report on 4 th 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 <u>Forest Heroes Report</u> on 21 st November 2017. In addition, we updated our <u>Sustainable Palm Oil Policy</u> in January 2018, and also released our <u>Palm Dashboard</u> 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. Our Palm Policy is further supported by our new " <u>Olam Living Landscapes Policy</u> " 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.	Closed

Closed Cases - Olam's Direct Suppliers

	Date Filed	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
14	3 rd Oct 2019	Sime Darby Plantation Sime Darby Plantation Sdn Bhd (Derawan, SOU 33)	Deforestation – 8 ha	Mighty Earth Rapid Response 19	Jan 2020 The RSPO has published the boundaries of SD's concession which includes Derawan SOU 33. SD has confirmed that this matter has been resolved to ME's satisfaction. Nov 2019 ME has come back to us to clarify that their report was based on the boundaries in SD's RSPO and MSPO report. We have are following up with SD on this matter. 3rd Oct 2019 Sime Darby conducted an investigation which found that the clearing happened outside its concession in the concession of a company named Semaian Tan (Kedah)	Closed
45	30 th Sept 2019	Sime Darby PT Sime Indo Agro (PT Sia), Minamas	Fire/hotspots in plantation— contributing to the haze as communicated by Indonesian Indonesian Environment and Forestry Minister Siti Nurbaya Bakar	Sept 2019: Star	Sdn Bhd which is not in Olam's supply chain 4th Oct 2019 From SD's hotspot dashboard there are/were 63(9%) hotspots within its concession in 2019 and 612(91%) outside its concession based on data obtained from Fire Information for Resource Management System (FIRMS), of the United States National Aeronautics and Space Administration (NASA) and ASEAN Specialised Meteorological Centre (ASMC). The latest hotspot was detected on 12th Sept 2019 in Pelangi Estate. The controls that SD has in place are: 1. Zero Burning Policy (policy extended 5km outside its plantation) 2. Fully equipped fire-fighting teams at all estates 3. Engagement with local community SD posted a response to this here	Closed

	Date Filed	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
46	30 th Sept 2019	IOI	Fire/hotspots in plantation— contributing to the haze as communicated by Indonesian Indonesian Environment and Forestry Minister Siti Nurbaya Bakar	Sept 2019: Star	IOI has issued a statement - here We have also sent a haze diagnostic to IOI as part of our investigation and monitoring	Closed
47	26th Nov 2019	Felda Global Ventures PT Citra Niaga Perkasa	Deforestation – 4 ha	Mighty Earth Rapid Response Report 20	18 Dec 2019 FGV has investigated and informed us that the land being cleared belongs to the local community. The clearing of the land has been carried out by the land owner since June 2019 for planting of paddy. 26 th Nov 2019 We have reached out to our supplier and are investigating this allegation.	Closed

	Date Filed	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
48	24 th June 2019	PT BEST	Potential deforestation seen through GFW GLAD alerts 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	Mighty Earth Rapid Response 16	Olam did not take physical shipment of the oil and we have no new contracts with PT BEST. 24 th 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. We have no new contracts with PT BEST	Closed

49	30 th Mar	GAR	Allegations:	Aug 2017	Listed on 11 Nov 2014 on G03, GAR's Grievance Log.	Closed
.	2018	- · · · ·	Clearance of	RAN: PT. Surya Panen Subur	Full details at this link	0.0004
			the Leuser	II failing to stop illegal fires and		
			Ecosystem's	destruction of Tripa peatland	Field Visit Report available here	
			critically		0	
			important Tripa		September 2018 These mills are no longer in Olam's supply chain	
			peatlandNew peat		These milis are no longer in Claim's supply chain	
			drainage		July 2018	
			canals built		CFT programme at PT SPS 2 completed.	
			 Illegal fires to 		In April GAR's internal team detected land clearing in	
			clear land		SPS concession.	
			 Loss of 24 		In May SPS confirmed that encroachment happened	
			hectares of		and was done by Haji Sanusi. Foresthints also	
			forest inside the concession		published a report on peat clearance. The following action was taken:	
			Clearance after		action was taken.	
			Government		SPS took the following action	
			moratorium for		12 Mar: Met with Haji Sanusi and clarified boundaries	
			land clearance		of SPS concession (HGU). Sanusi signed document	
			for palm		declaring he understood	
			July 16 and August		13 Mar: Met with Village Head of Kuala Seumaya to	
			21, 2017, an		report encroachment and submit acknowledgement by	
			additional 18 hectares were		Sanusi and requested help to stop further encroachment	
			cleared inside the		15 May: Met with Sub District head, Head of Police	
			PT. SPS II		Dept, Head of Millitary Dept to report encroachment	
			11.01011		and submit acknowledgment by Sanusi	
					Meeting between GAR and SPS was held to discuss	
					action plan	
					May 2040	
					 Mar 2018 Last up on GAR's log was Sept 2017. No new updates 	
					to date.	
					to date.	
					From log:	
					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	

	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	
50	23th Dec 2016 (closed)	Mewah – Supplier in 2016 only	Allegations are: 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	10 th Mar 2017 Mewah provide Olam with its traceability to mill information including GPS coordinates 5 th Jan 2017 Contacted Mewah and they have confirmed that: • They do not have plantation operations in Kalimantan • Does not source from PKP and PT Indo Olam will continue to engage with the supplier on full supply chain traceability	Closed

Closed Cases - Olam's Indirect Suppliers

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
51	24 Jan 2020	Borneo Pacific Group PT Arjuna Utama Sawit	Wilmar	Deforestation – 70 has	Mighty Earth Rapid Response 23	27 Mar 2020 Wilmar has updated us that this supplier is no longer in its supply chain since Feb 2019. The oil entered their supply chain indirectly and the supplier is not longer sourcing from this supplier.	Close
						24 Jan 2020	

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
						We have reached out to Wilmar and are waiting for a response	
52	30 th Sept 2019	Ta Ann: Ladang Selezu Sdn Bhd	Wilmar	Deforestation: 15 ha	Rapid Response Report 15	25 th Mar 2020 As part of the investigation, Wilmar 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 1st Oct 2019 Wilmar has initiated engagement with Ta Ann since May 2019 to seek clarifications on allegation of deforestation. Ta Ann has provided written commitment in adhering to the NDPE policy and shared its concession maps. Moratorium has been put in place. Wilmar held a meeting on 21 June 2019 and 12 July 2019 with Ta Ann. A field assessment was scheduled from 22-27 July 2019. Monitoring of Ladang Selezu's activities is ongoing on a monthly basis through its Supplier Group Compliance Verification programme.	Closed
53	2 nd Aug 2019	Yuwang, Empressa (M) Sdn Bhd	Bunge, Wilmar	Allegation of 4 ha's of forest clearance between March to July 2019 in Empressa concession shown on satellite imagery.	Rapid Response Report 17	25 th Mar 2020 Wilmar has updated that land clearing was not conducted by the company, it happened outside their concession boundary.	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
54	2 nd Aug 2019	PT Prima Sawit Andalan/ Dharma Sawit Nusantara Tbk (DSN Group)	Bunge	4 hectares of forest were cleared in the PT Prima Sawit Andalan concession	Mighty Earth Rapid Response Report 17	25 th Mar 2020 Buge's trade partner informed Bunge that the issue with the different maps has been solved. DSN shared the maps with revised boundaries of PT Putra Utama Lestari and PT Prima Sawit Andalan with RSPO. RSPO published the revised boundaries. The matter has been solved to the satisfaction of ME. Nov-19: Bunge's trade partner made overlay maps for the locations mentioned in the ME report, confirming alleged clearing was outside the concessions of DSN Group. 2nd Aug 2019 Olam does not buy from PT Prima Sawit Andalan but receive supplies associated with the DSN Group. We are awaiting feedback from Bunge	Closed
55	2 nd Aug 2019	Boustead Plantation Bhd/ Boustead Pelita Kanowit Sdn Bhd	Bunge	85 hectares were prepared for clearance	Mighty Earth Rapid Response Report 17	25 th Mar 2020 Land clearing was not conducted by the company and took place outside their concession boundary. 2 nd Aug 2019 Olam does not buy from Boustead Pelita Kanowit Sdn Bhd but receive supplies associated with Boustead Plantation Bhd We are awaiting feedback from Bunge	Closed
56		PT Union Sampoerna Triputra Persada	Wilmar	Deforestation – 42 ha	Mighty Earth Rapid Response 23	25 Mar 2020 Wilmar has confirmed that the clearing happened outside the boundary and was not conducted by the company.	Closed
		PT Harapan Hibrida Kalbar				24 Jan 2020 We have reached out to our supplier and are waiting for a response	

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
57	26 th Nov 2019	Surya Dumai Group - PT Kalimantan Agro Kencana	First Resource s	Clearance preparation/Stacking – 266 ha	Mighty Earth Rapid Response Report 20, 21	26 th Nov 2019 ME links Surya Dumai Group with FR. FR has informed us that "First Resources Limited (FR) is not part of Surya Dumai Group (SDG), and FR's controlling shareholder does not have any ownership or hold any management roles in SDG" We have asked FR to log this case publicly	Closed
58	2 nd Aug 2019	Sumber Tani Agung/ PT Tantahan Panduhup Asi	Bunge, GAR	70 hectares of forest were cleared	Mighty Earth Rapid Response Report 17	 25th Mar 2020 GAR has updated that STA shared with GAR an overlay map that showed the land clearing coordinates were located outside PT TPA ILOK (The ILOK map was revised in Oct 2018). See the following link: http://bit.ly/2SNA1ga. GAR internal analysis has verified that the land clearing was located outside PT TPA concession. ME and GAR have agreed that the land clearing is located outside the concession. 2nd Aug 2019 Olam does not buy from PT Tantahan Panduhup Asi but receive supplies associated with Sumber Tani Agung Group. We are awaiting feedback from Bunge & GAR 	Closed
59	6 Jan 2020	Fangiono Agro Plantation	Wilmar	Deforestation – 17 ha	Mighty Earth Rapid Response 22	27 th Mar 2020 Wilmar has confirmed that land clearing was not conducted by the company, it happened outside their concession boundary. 6 Jan 2020 Olam does not receive oil from the mill in question but receives supply through Wilmar from the parent company. We have reached out to our direct supplier and are waiting for a response	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
60		WTK/South Wind Plantation Sdn. Bhd	Wilmar Bunge	23 ha of forest clearance in Southwind Plantation Sdn Bhd concession	Mighty Earth Rapid Response Report 17	Nov 2019 Bunge trade partners have confirmed that Southwind is not connected with WTK	Closed
61	2 nd Aug 2019	Rimbunan Hijau Poh Zhen Sdn Bhd	Wilmar	Allegation: 1. 40 ha's peat development in Poh Zhen Sdn Bhd	Mighty Earth Rapid Response Report 17	19 th Nov 2019 Bunge's trading partners have confirmed that the clearing is non palm related 6 th Aug 2019 Olam does not source from the Poh Zhen but sources from mills associated with Rimbunan Hijau through Wilmar. We are waiting to hear back from our supplier on the result of their investigation	Closed
62	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	Nov 2019 The allege concession is not part of Bakri Group (ref 2018 Annual Report). Bunge considers the case closed 26th June 2019 This is an indirect source through Bunge. We do not receive oil from PT Menthobi Mitra Lestari but from other mills under Bakrie Sumatera Plantations. Bunge has updated that they are investigating the company link as well the allegations in ME's report.	Closed
63	2 nd Aug 2019	Makin/PT Mekar Karya Kahuripan	Bunge	25 hectares of peat forest were cleared in the PT Mekar Karya Kahuripan concession	Mighty Earth Rapid Response Report 17	Nov 2019 Bunge's trade partners have informed that the business activities of PT MKK have ceased since Sept 2016 2nd Aug 2019	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
						 Olam does not buy from PT Mekar Karya Kahuripan but receive supplies associated with the Makin Group. We are awaiting feedback from Bunge 	
64	Sept 2019	PT Tunas Borneo Plantations (Samling Group)	Wilmar	Deforestation -13 ha	Mighty Earth Rapid Response Report 18	Olam does not buy from the company in question but receives supplies associated with the parent company Samling Group has said that the area is no longer within their concession as Izin Lokasi of the area had expired. They have conducted a site visit at the alleged area and found out there was land clearing by local community and substantial land clearing by a mining company operating in the area.	Closed
65	3 rd Oct 2019	Kuala Lumpur Kepong Berhad P.T. Adei Plantation and Industry (P.T. Adei)- Riau	Bunge, Sime Darby, ISF, Musim Mas, IOI	Fire/hotspots in plantation—contributing to the haze as communicated by Indonesian Environment and Forestry Minister Siti Nurbaya Bakar	KLK confirms fires on estate; vows to cooperate with Indonesian authorities	 3rd Oct 2019 2.8 ha hotspot was extinguished on the same day by 120 firefighters aided by 11 excavators and Shihbaura pumps Controls in place: Zero burning policy Firefighting teams on estate Patrolling system and fire towers Assist local communities with fire fighting equipment 	Closed
66	30 th Sept 2019	PT Menteng Jaya Sawit Perdana (KLK Bhd)	Bunge, Sime Darby, IOI, IS, Musim Mas,	12 ha of peat development	Mighty Earth Rapid Response Report 18	30 th Sept 2019 KLK has responded with the following –"the alleged area is located within PT MJSP's permit area (Izin lokasi). It is however no longer within the management control of PT MJSP, as in 2016 the area was gazetted by Kementerian Lingkungan Hidup & Kehutanan ["KLHH"] as a Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area. A copy of the Ministerial Decree letter [Surat Keputusan Menteri] from KLHH and the location map of the HTR area relative to the alleged area is attached here. It is a local government development	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
						programme for the community in collaboration with Gabungan Kelompok Tani Hutan ("Gapoktan"), and is monitored by the Forest Agency [Dinas Kehutanan]. (Ref: here)	
67	30 th Mar 2019	Bunge LC	Wilmar, Musim Mas and GAR	Allegations against IOI Group and its suppliers for: • Land clearing • No proper FPIC conducted	27 th Sept 2016: A Deadly Trade-off: IOI's Palm Oil Supply Chain and its Human and Environmental Cost	 4th Oct 2019 Eagle High is not in our supply base March 2019 Eagle High is committed to maintain the moratorium. 25th July 2018 A moratorium remains in place. FPIC training has taken place. FPIC is still on hold while capacity of the team is increased. 31st May 2018 FPIC exercise will commence year end, to give time to increase capacity of team 30th Mar 2018 Bunge to update Olam on the latest development since the FPIC training and result of field visit in Oct 2017 Dec 2017 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 	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
68	30 th Sept 2019	Perkebunan Nusantara: PT Perkebunan Nusantara II Prafi	GAR	Deforestation: 18 ha	Mighty Earth Rapid Response 15	3 rd Oct 2019 GAR has shared with us a document entitled "Berita Acara Serah Terima" that showed that management of PT Perkebunan Nusantara II Prafi has been handed over to PT Yongjing Investindo	Closed
69	30 th Sept 2019	Tradewinds (Trans Kenyaland Sdn Bhd)	Bunge, IOI, Wilmar	Peat: 94 ha of peat development	Mighty Earth Rapid Response 18	1st Oct 2019 Bunge: Our trade partners confirmed shapefiles have been analysed which showed that the clearing was outside Tradewinds concession	Closed
70	30 th Sept 2019	Kwantas Kwantas Pelita Plantation (Balingian) Sdn Bhd	NA	Clearance prep/stacking: 5 ha	Mighty Earth Rapid Response 14	1st Oct 2019 Olam was named in the report but Olam does not buy from this supplier as per our Q2, 2019 Mill List	Closed
71	25 th June 2018	GAMA	Wilmar	Allegations Deforestation by a palm oil business run by Wilmar Indonesia's senior executives - Gama Plantation	25 June 2018 Greenpeace: Rogue Trader - Keeping Deforestation in the Family	1st Oct 2019 Gama is not in Olam's supply chain 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 31st Oct 2018 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 7th Sept 2018	Closed

Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes
					 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 26 July 2018 Olam has engaged with Wilmar on the status of this Grievance. 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
					20 June 2018 Letter from Wilmar's CEO 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
					19 th June 2018 GP shared with Wilmar a list of suppliers that are allegedly linked to GAMA Corp.

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
						 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 	
72	23 Dec 2016 -	Sarawak Palm Oil (SOP)/Shin Yang Group (SY) Dataran Linau Sdn Bhd (Lot 1 Block 14 Murum LD) #Mar 2019: SOP has clarified that SY is a separate entity from SOP	Sarawak Oil Palm (allege)	Between February 27, 2019 and May 27, 2019 a total of 548 hectares were prepared for clearance in the Dataran Linau Sdn Bhd concession 10ha Peat Development by Linau Sinar Sdn. Bhd. (Metalon OP Estate, Lot 2, Danum LD) Peat clearance - here.	Might Earth Rapid Response 17 Mighty Earth Rapid Response 13 (Mar 2019) Climate Advisers (2014	SOP & SY are separate legal entities and supplies from SY are not in Olam's supply chain. 2nd Aug 2019 SOP met with Linau Sinar management as part of its Supplier Engagement Programme. Linau Sinar is a FFB supplier to SOP's Metanic Palm Oil Mil 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). The conclusion is that the 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. 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 17 May 2019 We are still awaiting an update from SOP	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
						April 2019 SOP has clarified that SOP and SY are separate legal entities. It is investigating the peat clearance allegations and will update Olam	
73	2 nd Aug 2019	RGE PT Usaha Sawit Unggul	Apical	23 hectares of peat forest were cleared	Mighty Earth Rapid Response Report 17	6 th Aug 2019 Asian Agri commenced an investigation. Based on the evidence received, it has been confirmed that the land clearing is located outside of PT USU concession	Closed
74	2 nd Aug 2019	PT Paramitra Internusa Pratama (GAR)	Wilmar	Allege clearance of orangutan habitat	Forest Report: Intelligence Report- Orangutan Habitat Loss and Palm Mills	2 nd Aug 2019 Our direct supplier Wilmar has investigated and found the following: "the area in question is outside the concession boundaries of PT Paramitra Internusa Pratama, as per the Rights to Develop or Hak Guna Usaha (HGU). It is also outside the previously issued Location Permit (Izin Lokasi). The concession is neither GAR's concession nor within its supply chain"	Closed
75	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	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.	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
76	30 th Nov 2018	Bunge, ISF, Unimills (Sime Darby)	PT Susantri Permai (a subsidiary of Genting Plantation s Berhad)	Complaint raised through the RSPO that: 1. Orangutan found killed and eaten in the concession of PT Susantri Permai, a subsidiary of Genting Plantation	RSPO Case Tracker	25 th Sept 2018: The CP found that the mitigation actions to have been successfully conducted. Full details available here	Closed
77	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: 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	28 th Dec 2018 Bunge LC has updated that its trade partners are no longer buying from ANJ - see here 7 th Sept 2018 Bunge LC has updated that suspension of ANJ's supply remains. Mar 2018 Suspended from Bunge LC's supply chain	Closed
78	30 th Mar 2018	PT Austindo Nusantara Jaya Tbk (ANJ): Concessions: Permata Putera Mandiri and Putera Manunggal Perkasa Mill:	Bunge LC (sourcing from Wilmar, GAR, AAA (Apical), Musim Mas)	Allegations: 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	28 th Dec 2018 Bunge LC has updated that its trade partners are no longer buying from ANJ - see here 7 th Sept 2018 Bunge LC has updated that suspension of ANJ's supply remains. Mar 2018 Suspended from Bunge LC's supply chain	Closed

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
		PT Permata Putera Mandiri (Blok 1)			Supply and its Human and Environmental Cost		
79	12 th Apr 2018	PT Synergy Oil Nusantara (PT SON) (Refinery in Riau)	Direct Supplier	Allegation: Being a replacement buyer for both Sawit Sumbermas Sarana (SSMS) and Austindo Nusantara Jaya (ANJ) after both companies were suspended by other traders for NDPE violations. Felda Global Ventures, is PT SON joint venture partner	1st May 2018 Major Islamic Financier Singled Out for Deforestation in Indonesia 12th Apr 2018 TH Plantations and PT Synergy Oil: Leakage Risk at Plantation and Refinery	 Apr 2018 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
80	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	IFFCO has informed us on 21 Mar 2018 that PT BHD is no longer in its supply chain	Closed
81	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	24 th Sept 2018 Suspension remains in place 31 st May 2018 Bunge has removed this supplier from its supply chain 30 th Mar 2018 • Bunge LC to update Olam on these allegations	Closed
82	30 Mar 2018	PT Global Sawit Semesta (PT GSS) (sourcing	GAR	PT GSS buys from PT Indo Sawit Perkasa (PT ISP) that is alleged by RAN to be deforestation in Singkil Bengkung lowland	March 2017: RAN PT. Indo Sawit Perkasa caught destroying the lowland rainforests of Singkil- Bengkung	30 th Mar 2018 In Mar 2018, Olam had a discussion with GAR on PT GSS with the following updates:	Closed

Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes
	from PT Indo Sawit Perkasa		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		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

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
83	12th Dec 2016	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	30 th Mar 2018 IOI Pelita is not in Olam's supply chain 30 th Mar 2018 Olam does not source directly from IOI. Olam will be guided by RSPO's decision on the matter. 20 th Feb 2018 Review of RSPO Case Tracker (IOI - IOI Pelita Sdn Bhd) 24 th Jan 2018 – CP Meeting: Secretariat to proceed with a meeting with the Company and Grassroots to discuss the revision to the Action Plan 11 st 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. 28 th April 2017 Greenpeace suspends its campaign against IOI IOI's statement 5 th Jan 2017 Contacted IOI on 5 Jan and subsequent discussion	Closed

Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes
					has been organised. Requested clarification and actions taken on public allegations. IOI confirmed they have: Revised their palm policy in August 2016 Launched palm dashboard in December 2016 Engaged Global Environment Consultant (GEC) peat specialist Published suppliers (mill list) and related grievances Detailed response on Greenpeace report is also published on the website. Olam will continue to monitor IOI's performance and engage with the supplier.

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
84	30 th May 2017	PP London Sumatra (subsidiary of PT Salim Ivomas, who is subsidiary of Indo Agri)	Wilmar (suspended Salim in 2017) Bunge LC (suspended Salim)	Allegation from Aidenvironment's report: 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 Allegations are: 1. Salim Group using "shadow companies" to sidestep legal oversight. 2. Illegality: breaches of labour law including child labour and paying below minimum wage	RSPO Case Tracker 12 th Apr 2018 Indonesian billionaire using 'shadow companies' to clear forest for palm oil, report alleges Palm oil Sustainability Assessment of Salim Related Companies in Borneo Peat Forest 2017 Greenpeace Palm Oil Alert #2 June 2016 RAN: The Human Cost of Conflict Palm Oil	Olam does not buy directly from Salim Group. Sources come from Wilmar and Bunge LC (previously IOI LC). 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. Wilmar has updated that it has not bought from Salim since June 2017 24th Sept 2018 Bunge LC has suspended suppliers from Salim Group 31st May 2018 Field verification to take place on 4-8 June 2018 30th Mar 2018 Secretariat to follow up with the Complainants and Company with the plans for verification. 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. 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.	Suspended Close

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
				3. Deforestation: considerable forest clearance in 2013- 2014 included 1000 ha primary forest; satellite-based alerts suggest active clearance continuing in 2016 Exploitation: child labour on plantation, paying below minimum wage and breaches of health and safety standards		Indofood Agri Resource has also attended Wilmar's three-day training workshop focussing on the implementation of Wilmar's Policy in 22- 24 July 2017 (refer here for latest update (N16)) 30th May 2017 We have engaged with Wilmar and IOI LC. IOI LC has temporarily suspended trading with Indofood. Wilmar has engaged with them and will be guided by the RSPO's decision on the matter Indofood Agri Resources has officially adopted a "No Deforestation, No Peat, No Exploitation" (NDPE) policy" in February 2017.	
85	18th April 2017	Goodhope Asia Holdings (Carson Cumberbatch PLC, Sri Lanka) # RSPO member #PT Agro Harapan Lestari is the managing	LDC GAR Bunge LC	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 PT Nabire Baru Deforestation that caused floods in Sima Village; Irregularities including development without	March 2017 - GP Palm Oil Alert The issues raised by GP is part of an order case found on RSPO Case Tracker	9th April 2019 Goodhope is not part of Olam's supply chain (ref: Dec 2018 mill list) Case handled by RSPO Complaints Procedure May 2018 Mediation process. RSPO Secretariat coordinating. Mar 2018 A discussion was held with LDC in Mar 2018 and they have confirmed that they do not buy from Goodhope.	Closed

Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes
	agent for Goodhope		an Environmental Impact Assessment; 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.		Latest progress by Goodhope available on its Mar monthly update Olam will be guided by the decision of the RSPO on this matter. Feb 2018 GH publishes monthly sustainability updates. 10 monthly updates published thus far GAR grievance log of GH reviewed. Last update as of June 2017 on the above updates 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. 8th Jun 2017 IOI LC has temporarily suspended purchase from Goodhope and its subsidiaries 5th May 2017 GH announced its Sustainability Policy 28th Apr 2017 RSPO Precautionary Measure (Stop work order) issued 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). 18th Apr 2017 Olam has engaged with its suppliers on the report and require that they ensure all palm oil that is

	Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes	
86	30 th Mar 2018	TDM Berhad	Bunge LC Sime Darby Unimills	Allegations: 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	11th Jan 2018 WWF: It is large-scale deforestation, says WWF- Malaysia	supplied to Olam is in compliance with Olam's Sustainable Palm Policy The case is looked at by the RSPO Complaints panel. Latest update is available here We are also monitoring GAR's grievance log (ref: G23) We are monitoring the updates from our suppliers to ensure that any development that takes place is done in accordance with the RSPO. April 2019 The concession was not given to TDM. GIS monitoring ongoing 20th July 2018 No further update from Bunge LC Mar 2018 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
87	13 th Sept 2018	Prosper Group – said to be linked to Bewani Oil Palm Plantations Limited (BOPPL)	Bunge LC ISF Wilmar	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.	The Chain: Bewani Oil Palm Plantation Divestment Increases Risks of Continued Deforestation in Palm Oil Supply Chains	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 Bunge's investigation has found direct family affiliations to both Prosper/Far east Holdings and the Bewani Group	Suspended by our direct suppliers

Date	Indirect Supplier	Direct Supplier	Allegations	Source	Action Taken & Outcomes
					13 th Sept 2018 Olam has reached out to its direct suppliers all of whom have confirmed with Prosper Group that BOPPL is not liked to them.

Closed Cases - Olam's Direct Suppliers Cases Handled by the RSPO

	Date	Direct Supplier	Issues	Source	Action Taken & Outcomes Status	
88	23th	First	The company failed to carry	Might Earth	Aug 2019	Closed
	Dec	Resources	out HCV assessment prior to	RSPO Case	As of 10 th May the complaint has officially closed and formally	
	2016	DT Limnoh	land clearing and planting and	<u>Tracker</u>	transferred to the RSPO Investigation and Monitoring Unit	
		PT Limpah Sejahtera	not in compliance with RSPO's New Planting Procedure			
		Sejantera	(NPP).		17 May 2019	
			(111.1).		On 11 Mar 2019, RSPO sent a follow-up on the Show Cause Issued to FR.	
			RSPO Case Tracker:		Off 11 Mai 2019, NOFO Sent a follow-up off the Show Gause Issued to FK.	
			Non-compliance on the		On 8 April 2019 FR sent a response to the RSPO on the show cause and on	
			RSPO's New Planting		30 th April the RSPO responded to First Resources response.	
			Procedure (NPP).			
				In summary:		
		Violation of P&C 7.3 - New				
			plantings since November		PT Limpah's LUCA has been nullified due to	
			2005 have not replaced		"withholding"/miscommunication of the presence of peat. Hence the	
			primary forest or any area		LUCA needs to be redone.	
			required to maintain or enhance one or more High		Certification of PT Limpah remains suspended while the rest of the	
			Conservation Values.		companies can proceed with certification	
			Conservation values.		• RSPO has uploaded all of FR's responses (14 th Feb 2018, 3 rd July 2018,	
			Violation of RSPO P&C 5.2 -		21st Nov 2018, 2nd Jan 2019 and 8 April 2019) to the RSPO website.	
			The status of rare, threatened		9 th April 2019	
			or endangered species and		3 April 2013	
			other High Conservation Value		On 21 st Dec 2018 a show cause letter issued to First Resources.	
			habitats, if any that exist in the		Investigation initiated by Complaints Panel that FR wilfully withheld	
			plantation or that could be		information related to development on peat during the LUCA review. Full	
			affected by plantation or mill		letter available here - here	

Date	Direct Supplier	Issues	Source	Action Taken & Outcomes	Status
		management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.		FR has provided a response on 3 rd Jan 2019. The RSPO CP's decibe communicated to the respondent. 26 th Sept 2018 RSPO Secretariat to review the milestones 31 st May 2018 Compensation procedure in place Company can proceed with certification of other units Monitoring of compensation procedure by the RSPO is ongoing 20 th Feb 2018 Review of RSPO Case Tracker Company has submitted the LUCA and will proceed to the nex Findings of the LUCA review to be communicated to the Comp to issue their response to the request from the Company (dated January) in relation to lifting of the suspension allowing the Comproceed with the certification of its other management units.	t phase. any; CP d 9
				 20th Jan 2017 Contact FR on 5th and 20th Jan. FR confirmed that: 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 	

Closed Cases - Olam's Indirect Suppliers Handled by the RSPO

	Date	Direct Supplier	Indirect Supplier	Allegations	Source	Action Taken and Outcome	Status
89	6 Jan 2020	Agro Sarimas Group	Bunge	Deforestation -		Agro Sarimas Indonesia sent GAR the following clarification: Sarimas (PT ASI) stated it no longer had plans to open or develop land. Location of the alleged deforestation is outside PT ASI concession and according to PT ASI it was a fire	Closed

					incident. See PT ASI's official response here http://bit.ly/2PFatk7 and overlay map here http://bit.ly/2YCk8fE	
90 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: 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 swap area or Forest Area Release Permit and Business Permit (HGU).	RSPO Case Track	Olam buys indirectly through Bunge and ISF from the parent company and not the suppliers listed here. The case has been officially closed on 7th May 2019 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: 1. Stop Land Clearing initiated by respondent to remain 2. Each subsidiary to proceed with development once national legal and RSPO requirement are met including the new P&C 8 April 2019 No update from the RSPO CP 28th Dec 2018 No update from the RSPO CP 26th Sept 2018 The RSPO CP to deliver a decision soon. Full details -here	Closed

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	Date	Company	Allegations	Source	Response	Reference
91	30 th Sept 2019	Incasi Raya Group - PT Sumatera Jaya Agro Lestari	Deforestation: 27 ha Peat development: 12 ha Peat forest development: 61	Nov 2018: Mighty Earth Rapid Response 10	Olam was named in the report but Olam does not buy from this supplier as per our Q1-Q4, 2018 Mill List	Q1-Q4, 2018 Mill List
92	30 th Sept 2019	Golden Plantation - PT Airlangga Sawit Jaya	Deforestation – 9 ha	Mighty Earth Rapid Response 18	Olam was named in the report but Olam does not buy from Golden Plantation as per our Q2, 2019 Mill List	Olam Mill List as of Q2, 2019
93	6 Jan 2020	Double Dynasty DDB Bawan Plantation Sdn Bhd	Conflict with indigenous communities The indigenous communities have filed a report to the police, which states: 'On 28/06/2019 at approximately 0900 hrs at Sungai BawanBalingian TemudaLand owned by Tr. MuliAnak Lingir, Tr. JutiAnakMaga, UmputAnakBlajaand other residents of several longhouses in Sg Bawan Balingian area have discovered the land has been invaded by DDB BawanPlantation SdnBhd. Fruit gardens, herbs, rubber gardens, fish nets (moss), traps	Mighty Earth Rapid Response 21 with reference to Sarawarak Report	6 Jan 2020 Olam was named in the report but does not buy from Double Dynasty as per our Q3, 2019 Mill List	Q3, 2019 Mill List

and forest resources		
such as rattan, medicines		
and so on have been		
destroyed by DDB		
BawanPlantation		
SdnBhdmaking		
calvertsand several rivers		
in Sungai Bawanwere		
closed by DDB		
BawanPlantation		
SdnBhd.Bawanhas been		
closed by DDB		
BawanPlantation		
SdnBhd.		
Residents of longhouses		
have lost access to		
orchards and searched		
for sources of life in the		
BawanRiver.		
This report is for further		
action by the parties.'		