Intercontinental Specialty Fats Sdn. Bhd. Grievance Log (Updated 11 November 2020)

Ref	Date	Relationship	Subject Matter	Raised by	Progress	Status
No	Received	and supplier				
1.	17 th May	Direct/ Felda	Chain Reaction	Jan 2020:	RSPO suspended FGV'S RSPO	Suspended
	2017	Global Ventures	Research and	RSPO The Decision Letter	Certification due to seven non-	
			Greenpeace, plus		compliances highlighted by the	
			a case	Sept 2018: Greenpeace Final	Control Panel. <u>FGV's Response</u> to	
			investigated by	Countdown	RSPO's Complaints Panel's Letter	
			RSPO. Allegations:		dated 13th January 2020	
			FGV in	Mar 2018: Greenpeace's		
			Kalimantan's	Report "Moment of Truth"	FGV has published their progress	
			concession		and effort in addressing the	
			had cleared	Chain Reaction Research	grievances via their website, details	
			1600 Ha peat	(Jan 2018, May 2017)	as follow:	
			forest.			
			 On the 26th 	RSPO Case Tracker (FGV)	<u>Updates</u> in October 2017 on social	
			of July 2015,		compliance.	
			WSJ ran an	July 2017: WSJ - Palm-Oil		
			article by Syed	Migrant Workers Tell of	<u>Updates</u> in January 2018 on RSPO	
			Zain Al –	Abuses on Malaysian	certification status and peat	
			Mahmood	<u>Plantations</u>	restoration master plan.	
			alleging that			
			Felda has	July 2015: RAN - Joint NGO	<u>Updates</u> in April 2018 on time	
			breached	Statement: Modern Day	abound action plan.	
			labor	Slavery Found on RSPO		
			conditions in	Member Felda Global	Updates in May 2018 on	
			its	<u>Venture's Plantations</u>	commitment to NDPE Policy	
			plantations.		released in June 2018.	
			The			
			allegations		Following from FGV Holdings	
			are:		Berhad's public statement dated	

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			- That		30 th November 2018 in respect of	
			forced		the findings of the Complaints	
			labor is		Panel (CP) of the Roundtable on	
			being		Sustainable Palm Oil (RSPO) and	
			used		our letter to business partner on	
			- The		"FGV's Commitment to	
			workers		Roundtable of Sustainable Palm	
			are not		Oil (RSPO)" dated 7 th December	
			paid		2018, the company is pleased to	
			minimum		report on its progress in Serting	
			wages.		Estates that is the subject of the	
			 That their 		RSPO's investigations as per	
			health		document.	
			and			
			working			
			conditions			
			are			
			neglected			
			and			
			- Their			
			employers			
			withheld			
			their			
			passports			
2.	19 th	Direct/ Prosper	The Final	Sept 2018: <u>Greenpeace Final</u>	ISF has reached out with Prosper	Monitoring
	September	Group	Countdown: Now	<u>Countdown</u>	Group on 21 st Sep and they replied	implementati
	2018		or never to		that BOPPL is not linked to them.	on of action
				GP list of companies as		plan
				communicated to consumer	For further engagement, ISF has	
				goods companies in	partnered with Proforest to do one	

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	Neceived		reform the palm oil industry. - 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 clearing is allegedly in related party ownership in PNG concession	Greenpeace letter: "2020 NDPE policies"	of the site assessments of Prosper Group located in Peninsular Malaysia in September 2018. Relevant report already communicated to Prosper. In 19 Sep 2019, Prosper sent the second progress report to ISF for updating: a. NDPE Engagement activities b. Implementation plan c. Grievance management ISF will continue to monitor the action plan for the Bewani concession restoration/ conservation project.	
3	1 st Oct 2018	Indirect/Wilmar	Allege buying from groups that	Sep 2018:	7 th Dec 2018 Wilmar has issued a <u>joint statement</u> with Aid	Monitoring

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			are deforesting and land grabbing	Greenpeace - The Final Countdown	Environment as well as supported by Unilever and Mondelez on the following: • Wilmar will implement a "Suspend then engage" on the basis of verified proof starting Jan 2019. • Group level maps has been a condition for trade for all new suppliers. These maps will be uploaded to Aidenvironment supplier group mapping platform since May 2018. • 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. 28th Sep 2018 ISF engaged with Wilmar and they urged Greenpeace to adopt a collaborative mindset and work with the palm oil industry	Status
					to take genuine and positive action.	

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4.	25 th Jan 2019	Self- reported- ISF	Report from Chain of Reaction. Allegation that ISF is one of the leakage refineries without any NDPE policy in place	Chain Reaction Research Jan 2019: AAK Lags in Implementation of NDPE Best Practices	ISF has established the sustainability palm oil policy covering NDPE elements and dashboard in 2018. ISF will continue maintain an open and transparent two-way dialogue with our key stakeholders and provide regular updates on our sustainability work. The statement as attached.	Continuous improvement
5.	12 th April 2019	Direct/ Genting Plantations Berhad	Might Earth Rapid Respond Report 14. Allegation that ISF had sourced CPO or CPKO from the group which involve in deforestation.	Mighty Earth Rapid Respond Report 14	ISF did not source from Genting Plantations Berhad since November 2018. ISF has engaged with Genting for the allegation on 12 April 2019. Genting Plantations Berhad had issued a statement on 29 April 2019 and explained as below: a. The HCS report is being finalized by Aidenviroment and they will submit for peer review once is ready b. Stop work order put on the new land clearing ISF will continue monitor its implementation plan and update	Monitoring implementati on of action plan

Ref	Date	Relationship	Subject Matter	Raised by	Progress	Status
No	Received	and supplier			the grievances log whenever there are changes in progress.	
		Indirect/TH Plantations Group: Hydroflow Sdn Bhd via Wilmar			ISF did not source directly from TH plantations. The sourcing of PKO from TH plantations via PGEO, Wilmar.	Closed
		Bild vid William			ISF clarified with Wilmar on 18 April 2019; Wilmar confirmed that the deforestation allegation is untrue after their investigation with Aidenvironment, as the land clearing happened outside the concession of Hydroflow.	
		Indirect/ Kwantas Group: Kwantas Pelita Plantation (Balingian) Sdn Bhd via Apical			ISF only source PKO indirectly from Kwantas Group but via Apical Group. ISF already engaged with Apical Group on 12 April 2019 and awaiting their clarification.	Pending for clarification via our direct supplier
6	March 2020	Indirect/Samling Plantation via Bintulu Edible Oil (Wilmar	Might Earth Rapid Respond Report 24: Samling is responsible for clearing more than 779 hectares	Might Earth Rapid Respond Report 24; Might Earth Rapid Respond Report 28	ISF did not source directly from Samling Group plantations. The sourcing of PKO from Sampling Group via PGEO, Bintulu Edible Oil, Wilmar.	Suspended via our direct supplier

Ref	Date	Relationship	Subject Matter	Raised by	Progress	Status
No	Received	and supplier				
		International	of forest in		ISF clarified with Wilmar on 10	
		Ltd)	Sarawak,		March 2020; Wilmar confirmed	
			Malaysia. To date,		that they already suspended	
			four of Samling's		Samling since January 2020.	
			concessions have			
			been included in a			
			total of 11 Rapid			
			Response reports.			
7	April 2020	Indirect/ NPC	Rapid Response	Rapid Response Report 23 &	ISF did not source directly from	Closed
		Resources Bhd:	Report 23 & 25: A	<u>25</u>	NPC Resources Berhad plantations.	
		Berkat Setia Sdn	total of 1047		The sourcing of PKO from NPC	
		Bhd via	hectares of forest		Resources Bhd- Berkat Setia Sdn	
		Sandakan Edible	were cleared in		Bhd via PGEO, Sandakan Edible Oil,	
		Oils Sdn Bhd,	the PT Sumber		Wilmar.	
		Sandakan –	Alam Selaras			
		Wilmar	concession.		Wilmar verified as ineligible in their	
		International			grievance list. The area in question	
		Ltd			in PT Sumber Alam Selaras was not	
					cleared by the company but	
					impacted by forest fires that struck	
					during the peak of the dry season	
					in September 2019.	
8	April 2020	Indirect/	Rapid Response	Rapid Response Report <u>17</u>	ISF did not source directly from	Closed
		Rimbunan Hijau	Report 17 and 26:	and <u>26</u>	Rimbunan Hijau – Poh Zhen. The	
		– Poh Zhen Sdn	Satellite imagery		sourcing of PKO from Rimbunan	
		Bhd via Bintulu	(see below) shows		Hijau - Woodijaya Sdn Bhd (Lot	
		Edible Oils Sdn	that between		197) via PGEO, Bintulu Edible Oil,	
		Bhd – Wilmar	March 12, 2019		Wilmar.	
			and July 7, 2019 a			

Ref	Date	Relationship	Subject Matter	Raised by	Progress	Status
No	Received	and supplier				
		International Ltd	total of 40 hectares of peat were developed and 58 hectares were prepared for clearance in the Poh Zhen Sdn Bhd concession. And additional 8.43 hectares was identified using screened GLAD alerts Feb 17 to Mar 16, 2020.		Wilmar verified as ineligible grievance in their grievance list. The land clearing is not related to oil palm development.	
9	April 2020	Indirect/ Tabung Haji via Bintulu Edible Oils Sdn Bhd – Wilmar International Ltd	Between January 2016 and December 2018, TH Plantations cleared some 2,223 ha of forest in these developments, followed by another 22 ha in early 2019. In the area designated for clearing for the third phase of the	Chain Reaction Research	ISF did not source directly from Tabung Haji Plantations. The sourcing of PKO from via PGEO, Sandakan Edible Oil and Bintulu Edible Oil, Wilmar. Based on the Wilmar's investigation result, TH Plantations Berhad (THP) does not own any shares in Deru Semangat Sdn Bhd (DSSB). However, their holding company, Lembaga Tabung Haji (LTH) owns 55% of DSSB.	Monitoring implementati on of action plan

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			project, 7,350 ha		THP is in the process of finalising	
			has been logged		the termination of their	
			since 2015,		Management Agreement with	
			including 2,320 ha		DSSB which is targeted to be	
			in 2019.		completed by end July 2020. THP	
					has also agreed to put in place NDPE commitments. Meanwhile	
					THP have ceased all oil palm	
					development in DSSB.	
					development in 5555.	
					Based on Wilmar's internal LUCA	
					assessment of the DSSB concession	
					area, there has been no land	
					clearing in 2020.	
					Engagement with THP in relation to	
					their our re-entry criteria has been	
					triggered since July 2020, and	
					Wilmar will continue to guide THP	
					in meeting the criteria.	
10	April 2020	Indirect/ Pipit	Satellite imagery	Might Earth Rapid Respond	ISF did not source directly from	Monitoring
10	April 2020	Mutiara Indah,	shows that	Report 21	Pipit Mutiara Indah, a subsidiary of	implementati
		a subsidiary of	between January	REPORTE	QL Resources. The sourcing of PKO	on of action
		QL Resources	3, 2019 and	Might Earth Rapid Respond	from via TSH Wilmar Sdn Bhd.	plan
		Bhd via TSH	October 20, 2019	Report 28	1	!
		Wilmar Sdn Bhd	a total of 50		Based on the Wilmar's respond,	
			hectares were		they initiated engagement with PT	
			prepared for		Pipit Mutiara Indah (PMI) since	
			clearing in the PT		April 2019 to seek clarification on	

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No	Received	and supplier				
			Pipit Mutiara		deforestation alert detected	
			Indah concession.		through their Supplier Group	
					Compliance Verification	
					programme. Based on the	
					supporting document submitted by	
					supplier, it was clarified that the	
					deforestation happened outside	
					their concession boundary. PMI did	
					not carry out any land clearing	
					inside their concession for oil palm	
					development. First meeting with	
					PMI was conducted in May 2019,	
					where Wilmar has reiterated the	
					NDPE policy compliance. PMI	
					provided written confirmation to	
					the commitment of NDPE policy	
					and shared their concession map	
					for our ongoing monitoring.	
					They continue to monitor the case	
					and their internal monitoring	
					report in October 2019 has	
					detected land clearing at PT PMI.	
					During Wilmar's investigation and	
					engagement with PMI, it was	
					clarified that the area has already	
					being felled several years ago and	
					now being cleared for planting.	
					However, as there was no HCS/HCV	
					assessment conducted, they	

Ref No	Date Received	Relationship and supplier	Subject Matter	Raised by	Progress	Status
No	Received	and supplier			considered this as a non-compliant to the NDPE policy. PMI has committed to immediate moratorium and they continue to guide PMI in NDPE policy compliance. In April 2020, QL Group has met all the criteria stipulated in the reentry criteria, including their commitment to the Development of Recovery Plan for Non-Compliant Land Clearing to NDPE policy at group level incurred from January 2016 onwards. Based on detailed review of documentation, reports and letter of commitment from QL Group, the	
					Wilmar Suspension Committee have given due consideration of this progress and have lifted the suspension on QL Group in April 2020.	
11	April 2020	Indirect/ Kirana Palm Oil Refinery Sdn. Bhd (BLD Plantations	A total of 1,283 hectares of peat forest were developed in within BLD	Might Earth Rapid Response Report 11 http://www.mightyearth.org /wp-content/uploads/KTS-	ISF did not source directly from Kirana Palm Oil Refinery Sdn. Bhd, a subsidiary of BLD Plantations Berhad. The sourcing of PKO from via Palmco Oil Mill Sdn Bhd.	Suspended via our direct supplier

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No	Received	and supplier				
		Berhad) via Palmco Oil Mill Sdn Bhd.	Plantation's concession. KTS Group's ongoing deforestation its BLD Plantation Bhd concession located north of	draft- complaint 20190515 Final short.pdf	ISF will no longer accept oil from this supplier. We have informed our trading partners and commercial team accordingly	
12	July 2020	Indirect/ Rimbunan Hijau: PJP Pelita Lundu Plantation Sdn Bhd via	Sibu, Sarawak. Between February 11, 2020 and May 6, 2020, a total of 4 hectares of forest was cleared in the PJP Pelita Lundu Plantation Sdn Bhd concession.	Might Earth Rapid Response Report 29	ISF did not source directly from PJP Pelita Lundu Plantation Sdn Bhd or its mill. The sourcing of PKO from via Bintulu Edible Oil. The land clearing was not conducted by the company. That particular area (LOT N17) is still owned by the local smallholders as it has not been surrendered yet. The land clearing was done by those local smallholders.	Closed
13	July 2020	Indirect/ Rimbunan Hijau – Poh Zhen Sdn Bhd via Bintulu Edible Oils Sdn Bhd – Wilmar	Satellite imagery shows that between July 31, 2019 and May 26, 2020 a total of 66 hectares of peat was developed	Might Earth Rapid Response Report 29	ISF did not source directly from Rimbunan Hijau – Poh Zhen. The sourcing of PKO from Rimbunan Hijau - Woodijaya Sdn Bhd (Lot 197) via PGEO, Bintulu Edible Oil, Wilmar.	Closed

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14	Aug 2020	Indirect/ YP Plantation Holdings Sdn Bhd (YPPH) via our palm kernel crusher	and 54 hectares were prepared for clearing (stacking lines) in the Poh Zhen SdnBhd concession Satellite imagery (see below) shows that between January 21, 2019 and June 19, 2020 a total of 1,807 hectares of peat was developed and a total of 1,216 hectares were prepared for clearing (stacking lines) in the YP Plantation Sdn	Might Earth Rapid Response Report 30	Wilmar verified as ineligible grievance in their grievance list. The land clearing is not related to oil palm development. ISF did not source directly from YP Plantation Holdings Sdn Bhd (YPPH) but via our palm kernel crusher; YPPH is a supplier to a POM which supplying palm kernel to the KCP. YP Plantation has committed to adopt NDPE and imposed a moratorium on land clearing with effective from 17 th August 2020. A copy of the NDPE policy is available here. As now, ISF awaiting their further	Under progress of investigation and engagement.
			Bhd concession.		announcement on the recovery plan.	
15	Aug 2020	Indirect/ Amanah Saham Pahang Berhad (ASPA) via our palm kernel crusher	Satellite imagery (see below) shows that between a. Area A: February 5, 2019 and July 7, 2020 a total	Might Earth Rapid Response Report 30	ISF did not source directly from Amanah Saham Pahang Berhad (ASPA) but via our palm kernel crusher; ASPA is a supplier to a POM which supplying palm kernel to the KCP.	Under progress of investigation and engagement.

Ref	Date	Relationship	Subject Matter	Raised by	Progress	Status
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	Received	and supplier	of 33 hectares of forest was cleared in the Mentiga Corporation Bhd concession. b. Area B: February 11, 2019 and May 7, 2020 a total of 58 hectares of forest was cleared in the Mentiga Corporation Bhd		ASPA has committed to adopt NDPE commitment and imposed a moratorium on land clearing. A copy of their NDPE Policy was shared with our suppliers on 9th July 2020. As now, ISF awaiting their further announcement on the recovery plan.	
16	Oct 2020	Indirect/ LKPP/PKPP supplying FFB via Sungai Terah Palm Oil Mill	concession. Satellite imagery (see below) shows that: a. Between Feb 11 2019 and May 2020, a total 101 ha of forest was cleared b. Between March 3, 2020	Mighty Earth Rapid Response Report 30 and Mighty Earth Rapid Response Report 31	Based on the meeting minutes provided by Sungai Terah Palm Oil Mill, the stakeholder have requested that LKPP/PKPP to: 1. Publish and commit to an NDPE policy. 2. Moratorium on clearing for palm. 3. Agree on a recovery plan.	Under progress of investigation and engagement

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No	Received	and supplier				
			and 27 Oct		A follow up meeting will be	
			2020; a total		conducted later on.	
			of 22 ha			
			hectares was			
			cleared			
			(Cherating)			
			concession			