

Intercontinental Specialty Fats Sdn. Bhd. Grievance Log (Updated 12 January 2021)

Ref No	Date Received	Relationship and supplier	Subject Matter	Raised by	Progress	Status
1.	17 th May 2017	Direct/ Felda Global Ventures	<p>Chain Reaction Research and Greenpeace, plus a case investigated by RSPO. Allegations:</p> <ul style="list-style-type: none"> • FGV in Kalimantan's concession had cleared 1600 Ha peat forest. • On the 26th of July 2015, WSJ ran an article by Syed Zain Al – Mahmood alleging that Felda has breached labor conditions in its plantations. The allegations are: <ul style="list-style-type: none"> - That forced labor is being used - The workers are not paid minimum wages. 	<p>Jan 2020: RSPO The Decision Letter</p> <p>Sept 2018: Greenpeace Final Countdown</p> <p>Mar 2018: Greenpeace's Report "Moment of Truth"</p> <p>Chain Reaction Research (Jan 2018, May 2017)</p> <p>RSPO Case Tracker (FGV)</p> <p>July 2017: WSJ - Palm-Oil Migrant Workers Tell of Abuses on Malaysian Plantations</p> <p>July 2015: RAN - Joint NGO Statement: Modern Day Slavery Found on RSPO Member Felda Global Venture's Plantations</p>	<p>RSPO suspended FGV'S RSPO Certification due to seven non-compliances highlighted by the Control Panel. FGV's Response to RSPO's Complaints Panel's Letter dated 13th January 2020</p> <p>FGV has published their progress and effort in addressing the grievances via their website, details as follow:</p> <p>Updates in October 2017 on social compliance.</p> <p>Updates in January 2018 on RSPO certification status and peat restoration master plan.</p> <p>Updates in April 2018 on time abound action plan.</p> <p>Updates in May 2018 on the commitment to NDPE Policy released in June 2018.</p> <p>Following from FGV Holdings Berhad's public statement dated</p>	Monitoring implementation of action plan

ISF Grievance Log (Updated 12 January 2021)

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			<ul style="list-style-type: none"> - That their health and working conditions are neglected and - Their employers withheld their passports 	<p>September 2020: Associated Press Article 'Palm oil labor abuses linked to world's top brands, banks'</p> <p>September 2020: U.S. Customs and Border Protection (CBP) Announces Detention Order/Withhold Release Order (WRO) on FGV</p> <p>November 2020: Associated Press Article 'Rape, abuses in palm oil fields linked to top beauty brands'</p>	<p>30th November 2018 in respect of the findings of the Complaints Panel (CP) of the Roundtable on Sustainable Palm Oil (RSPO) and our letter to the business partner on “FGV’s Commitment to Roundtable of Sustainable Palm Oil (RSPO)” dated 7th December 2018, the company is pleased to report on its progress in Serting Estates that is the subject of the RSPO’s investigations as per document.</p> <p>FGV released a media statement to reiterate their commitment to human rights, though the raised article was not referenced.</p> <p>FGV issues response to the U.S. CBP's Detention Order.</p> <p>FGV publishes the Fair Labour Association's (FLA) assessment report on FGV's action plan to enhance labour practices.</p> <p>FGV provides updates regarding their engagement with US CBP to resolve the ongoing matter.</p>	

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					FGV released a media statement in response to the article and reiterates their commitments to human rights and labour standards.	
2.	19 th September 2018	Direct/ Prosper Group	<p>The Final Countdown: Now or never to reform the palm oil industry.</p> <ul style="list-style-type: none"> - 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 	<p>Sept 2018: Greenpeace Final Countdown</p> <p>GP list of companies as communicated to consumer goods companies in Greenpeace letter: “2020 NDPE policies”</p>	<p>ISF has reached out with Prosper Group on 21st Sep and they replied that BOPPL is not linked to them.</p> <p>For further engagement, ISF has partnered with Proforest to do one of the site assessments of Prosper Group located in Peninsular Malaysia in September 2018. Relevant reports already communicated to Prosper.</p> <p>On 19 Sep 2019, Prosper sent the second progress report to ISF for updating:</p> <ol style="list-style-type: none"> NDPE Engagement activities Implementation plan Grievance management <p>ISF will continue to monitor the action plan for the Bewani concession restoration/conservation project.</p>	Monitoring implementation of action plan

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3	1 st Oct 2018	Indirect/Wilmar	Allege buying from groups that are deforesting and land grabbing	Sep 2018: Greenpeace - The Final Countdown	<p>7th Dec 2018 Wilmar has issued a joint statement with Aid Environment as well as supported by Unilever and Mondelez on the following:</p> <ul style="list-style-type: none"> • Wilmar will implement a “Suspend then engage” based on verified proof starting Jan 2019. • Group level maps have 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. <p>28th Sep 2018 ISF engaged with Wilmar and they urged Greenpeace to adopt a collaborative mindset and work with the palm oil industry</p>	Monitoring

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					to take genuine and positive action.	
4.	25 th Jan 2019	Self- reported- ISF	Report from Chain of Reaction. Allegations 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	<p>ISF has established the sustainability palm oil policy covering NDPE elements and dashboard in 2018.</p> <p>ISF will continue to maintain an open and transparent two-way dialogue with our key stakeholders and provide regular updates on our sustainability work. The statement as attached.</p>	Continuous improvement
5.	12 th April 2019	Direct/ Genting Plantations Berhad	Might Earth Rapid Respond Report 14. Allegations that ISF had sourced CPO or CPKO from the group who are involved in deforestation activities.	Mighty Earth Rapid Respond Report 14	<p>ISF did not source from Genting Plantations Berhad since November 2018.</p> <p>ISF has engaged with Genting for the allegation on 12 April 2019. Genting Plantations Berhad has issued a statement on 29 April 2019 and explained as below:</p> <ol style="list-style-type: none"> a. The HCS report is being finalized by Aidenviroment and they will submit for peer review once is ready b. A Stop-work order was put on the new land clearing 	Monitoring implementation of action plan

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					ISF will continue to monitor its implementation plan and update 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. 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.	Closed
		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	Might Earth Rapid Respond Report 24: Samling is responsible	Might Earth Rapid Respond Report 24;	ISF did not source directly from Samling Group plantations. The sourcing of PKO from Sampling	Suspended via our direct supplier

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		Oil (Wilmar International Ltd)	for clearing more than 779 hectares of forest in Sarawak, Malaysia. To date, four of Samling's concessions have been included in a total of 11 Rapid Response reports.	Might Earth Rapid Respond Report 28	Group via PGEO, Bintulu Edible Oil, Wilmar. ISF clarified with Wilmar on 10 March 2020; Wilmar confirmed that they already suspended Samling since January 2020.	
7	April 2020	Indirect/ NPC Resources Bhd: Berkat Setia Sdn Bhd via Sandakan Edible Oils Sdn Bhd, Sandakan – Wilmar International Ltd	Rapid Response Report 23 & 25: A total of 1047 hectares of forest were cleared in the PT Sumber Alam Selaras concession.	Rapid Response Report 23 & 25	ISF did not source directly from NPC Resources Berhad plantations. The sourcing of PKO from NPC Resources Bhd- Berkat Setia Sdn Bhd via PGEO, Sandakan Edible Oil, Wilmar. Wilmar verified as ineligible in their grievance list . The area in question in PT Sumber Alam Selaras was not cleared by the company but was impacted by forest fires that struck during the peak of the dry season in September 2019.	Closed
8	April 2020	Indirect/ Rimbunan Hijau – Poh Zhen Sdn Bhd via Bintulu Edible Oils Sdn Bhd – Wilmar	Rapid Response Report 17 and 26: Satellite imagery (see below) shows that between March 12, 2019, and July 7,	Rapid Response Report 17 and 26	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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		International Ltd	2019, a 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 was verified as an 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 project, 7,350 ha has been logged since	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 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 implementation of action plan

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

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					<p>deforestation alert detected through their Supplier Group Compliance Verification programme. Based on the supporting document submitted by the 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. The 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 the NDPE policy and shared their concession map for our ongoing monitoring.</p> <p>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 been felled several years ago and now being cleared for planting. However, as there was no HCS/HCV</p>	

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					<p>assessment conducted, they considered this as a non-compliant to the NDPE policy. PMI has committed to an immediate moratorium and they continue to guide PMI in NDPE policy compliance.</p> <p>In April 2020, QL Group has met all the criteria stipulated in the re-entry 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.</p> <p>Based on a 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.</p>	
11	April 2020	Indirect/ Kirana Palm Oil Refinery Sdn. Bhd (BLD	A total of 1,283 hectares of peat forest were developed within BLD	Might Earth Rapid Response Report 11	ISF did not source directly from Kirana Palm Oil Refinery Sdn. Bhd, a subsidiary of BLD Plantations	Suspended via our direct supplier

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		Plantations Berhad) via Palmco Oil Mill Sdn Bhd.	Plantation's concession. KTS Group's ongoing deforestation its BLD Plantation Bhd concession located north of Sibul, Sarawak.	http://www.mightyearth.org/wp-content/uploads/KTS-draft-complaint_20190515_Final_short.pdf	Berhad. The sourcing of PKO from via Palmco Oil Mill Sdn Bhd. 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	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 and 54 hectares were prepared for clearing	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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			(stacking lines) in the Poh Zhen SdnBhd concession		Wilmar was verified as an ineligible grievance in their grievance list . The land clearing is not related to oil palm development.	
14	August 2020	Indirect/ YP Plantation Holdings Sdn Bhd (YPPH) via our palm kernel crusher	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 Bhd concession.	Might Earth Rapid Response Report 30	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 adopting 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 announcement on the recovery plan.	Under progress of investigation and engagement.
15	August 2020	Indirect/ Amanah Saham Pahang Berhad (ASPA) via our palm kernel crusher	Satellite imagery (see below) shows that a. Area A: February 5, 2019, and July 7, 2020, a total of 33 hectares of forest were cleared in the	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. ASPA has committed to adopting NDPE commitment and imposed a	Under the progress of investigation and engagement.

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			<p>Mentiga Corporation Bhd concession.</p> <p>b. Area B: February 11, 2019, and May 7, 2020, a total of 58 hectares of forest was cleared in the Mentiga Corporation Bhd concession.</p>		<p>moratorium on land clearing. A copy of their NDPE Policy was shared with our suppliers on 9th July 2020.</p> <p>As now, ISF awaiting their further announcement on the recovery plan.</p>	
16	October 2020	Indirect/LKPP/PKPP supplying FFB via Sungai Terah Palm Oil Mill	<p>Satellite imagery (see below) shows that:</p> <p>a. Between Feb 11 2019 and May 2020, a total 101 ha of forest was cleared</p> <p>b. Between March 3, 2020 and 27 Oct 2020; a total of 22 ha hectares was cleared (Cherating) concession</p>	<p>Might Earth Rapid Response Report 30</p> <p>Mighty Earth Rapid Respond Report 31</p>	<p>Based on the meeting minutes provided by Sungai Terah Palm Oil Mill, the stakeholder have requested that LKPP/PKPP to:</p> <ol style="list-style-type: none"> 1. Publish and commit to an NDPE policy. 2. Moratorium on clearing for palm. 3. Agree on a recovery plan. <p>A follow up meeting will be conducted later on.</p>	Under the progress of investigation and engagement.
17	December 2020	Direct/Sime Darby Plantations	<p>On 30 December 2020, the Associated Press (AP) released an article linking</p>	<p>December 2020: Associated Press Article 'Child labor in palm oil</p>	<p>SDP released a media statement to reiterate their commitment to human rights, though the raised article was not referenced.</p>	Monitoring implementation of action plan

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		(SDP) for PKO products	<p>several industries, one of them SDP, to alleged child labour.</p> <p>The United States Customs and Border Protection (CBP) subsequently issued a Withhold Release Order (WRO) against Sime Darby based on information that reasonably indicates the presence of all 11 of the International Labour Organization's (ILO) forced labor indicators in SDP's palm oil production process.</p>	<p>industry tied to Girl Scout cookies'</p> <p>December 2020: U.S. Customs and Border Protection (CBP) Announces Detention Order/Withhold Release Order (WRO) on SDP</p>	<p>RSPO released a statement on CBP's WRO, acknowledging the issue but has requested CBP to provide specific information on the allegations for SDP to resolve the issue.</p> <p>SDP and RSPO have released statements and requested CBP & AP to provide more specific information for them to address the allegations.</p> <p>ISF has engaged with SDP as of 13th January 2021 for the latest progress and will continue to monitor the case closely.</p>	