



Sustainability Policy

**For Intercontinental Specialty Fats Sdn Bhd
and its stakeholders**

VERSION 3.0

April 2025



1 Introduction

Intercontinental Specialty Fats Sdn. Bhd. (ISF) is one of the leading specialty oils & fats manufacturers with refining and downstream processing facilities with factories located in Peninsular Malaysia.

We specialise in producing high-quality palm specialty oils and fats to meet the needs of our global customers. In addition to having the advantage of being close to raw material supplies, we are committed to responsible governance practices to ensure the sustainability of our operations. We are deeply concerned about the potential long-term environmental and social impacts caused by palm oil production and have implemented robust governance frameworks to address these challenges, including compliance with industry standards, stakeholder engagement, and continuous monitoring of our environmental and social performance.

This is the latest revision of our Sustainability Policy, reflecting our evolving commitment to responsible and sustainable practices since the launch of our original Sustainable Palm Oil Policy in 2017. Over the years, we have consistently advanced our efforts to ensure that all raw materials are sourced responsibly, aligning with our No Deforestation, No Peat, and No Exploitation (NDPE) principles. We uphold industry-recognised certifications like RSPO and MSPO while integrating broader sustainability frameworks.

We are equally committed to maintaining high ethical standards and corporate governance, working collaboratively with our suppliers, partners, and all stakeholders to drive meaningful and sustainable change across our value chain. We require all our palm product suppliers to comply with the ISF Sustainable Palm Oil Policy effective immediately. We understand the sustainability journey can take time and the support required by our suppliers will vary. Suppliers who fail the requirements without any reasonable clarification may face discontinuation of business relationships subject to our Supplier Code of Conduct.

2 Scope

This policy applies to all ISF-owned operations worldwide, including our facilities, joint ventures, subsidiaries, and all direct and indirect suppliers within our palm oil supply chain. All suppliers are required to adhere to the commitments outlined in this Policy as a condition of doing business with ISF.

3 Commitment to NDPE Policy

ISF is committed to building a traceable and sustainable palm oil supply chain and is actively working with our suppliers to ensure all palm products are sourced responsibly.

We are committed to responsible sourcing in line with our No Deforestation, No Peat, and No Exploitation (NDPE) commitments as follows:

3.1 No Deforestation and No Peat

ISF is committed to the conservation of a healthy environment. We work to avoid and/or minimise any adverse impacts our operations and supply chain may have on natural resources and the environment through the following:

- Identifying High Conservation Value (HCV) and High Carbon Stock (HCS) areas following international best practice guidance including:
 - Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria
 - High Conservation Value Resource Network (HCVRN)
 - High Carbon Stock (HCS) Approach
- All new assessments must be integrated with HCV-HCSA assessments led by Assessor Licensing Scheme (ALS) assessors and HCSA registered practitioners, and undergo necessary HCVRN or HCSA quality review.
- Enforce the protection and management of HCVs in existing plantations and all other aspects of production and processing in their supply chain, including:
 - Identification, mapping, and reporting on biodiversity hotspot areas to promote biodiversity conservation and management.
 - Prohibit hunting activities and only promote the sustainable hunting of species.
- No new development on peatland regardless of depth while promoting the best principles of agriculture:
 - Identification, mapping, and reporting on peat areas.
 - Implementation of best management practices to protect and enhance soil health across all plantations, including peatlands.
 - Exploring options for peat restoration where possible by working with expert stakeholders and communities.
- No use of fire in land preparation including planting and replanting and no burning of waste.
- Commensurate remediation or corrective action plan for any non-compliance (e.g. the conversion or development of HCV or HCS areas is required as a criterion to re-enter ISF's supply chain.
- The cut-off date for no conversion of HCS forests, HCV areas, or peatland is 31st December 2015.

3.2 No Exploitation

ISF is committed to respecting human rights as protected under the [International Bill of Human Rights](#), the [International Labour Organization's \(ILO\) eight Core Conventions](#), and the [Declaration on Fundamental Principles and Rights at Work](#). We also pledge to respect the formal and customary rights of indigenous and local communities following the [United Nations Declaration on the Rights of Indigenous Peoples \(UNDRIP\)](#). In doing so, we are further guided by the [United Nations Guiding Principles \(UNGPs\) on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises](#). We expect compliance with all applicable laws and regulations and where differences occur, to uphold the principles of internationally recognised human rights.

- Workers
 - Respect the rights of all workers, including temporary, contractual, and migrant workers.
 - Eliminate all forms of child labour, forced labour, and human trafficking.
 - Respect workers' right to the freedom of association and collective bargaining.
 - Follow responsible recruitment practices including no payment of recruitment fees by workers and no retention of passports or other identity documents of workers by employers.
 - Pay wages that meet or exceed the legal minimum wage, taking into account reasonable production targets and working hours.
 - Limit working hours according to national law and overtime shall always be voluntary and remunerated according to national requirements.
 - Provide a safe and healthy working environment as well as cover medical treatment for any work-related incidents.
 - Provide adequate and decent housing accommodation with a suitable living environment and access to sanitation and basic amenities.
 - Eliminate harassment, intimidation, criminalisation, and the use of violence from all forms of activities within the supply chain.
 - Provide equal treatment and opportunity to all workers including equal pay to men and women for work of equal value
 - Prohibit all forms of discrimination on sexual orientation, gender, religion, race, disability, age, political affiliation, marital status, or national origin.
- Indigenous peoples and local communities
 - Any new development for palm oil production must demonstrate respect for the statutory and customary rights of indigenous people and local communities.

- Respect the right of Indigenous peoples and local communities to grant or withhold Free, Prior, and Informed Consent (FPIC) for all new developments, expansions, acquisitions, and operations that affect their rights, land, resources, territories, livelihoods, and food security.
- Engage regularly with stakeholders to ensure effective implementation and participation in FPIC processes. Conduct a Social and Environmental Impact Assessment (SEIA) or a local equivalent before undertaking any new developments.
- Human rights defenders, complainants, whistleblowers, and community spokespersons
 - Prohibit the use of threats, harassment, intimidation, violence, or any form of retaliation against or interference with the activities of human rights defenders (including environmental and land defenders), complainants, whistleblowers, and community spokespersons.
 - ISF also operates a [Whistleblowing Policy](#) that sets out avenues for legitimate concerns made in good faith to be objectively investigated and addressed, whilst ensuring adequate retaliation protection to the Whistleblower.

4 Traceability

We have achieved 100% fully traceable to the palm oil mills by 2016 for our palm product supplies. We will continue to work towards improving traceability to plantations for our supply chain through supplier engagements and stakeholder collaborations.

For direct and indirect sourcing from mills or trading companies, suppliers shall disclose traceability to mill and/or plantation level as part of our due diligence and risk assessment consistent with our [Traceability Protocol](#). Suppliers shall have a system to monitor their sources of Fresh Fruit Bunches (FFBs) and supply chains as a whole to ensure that they adhere to ISF's Policy.

5 Smallholder inclusiveness and supporting collaborations

ISF is committed to supporting the inclusion of smallholders into the supply chain through appropriate strategies including capacity building, productivity improvement, and the adoption of sustainable practices.

ISF also recognises the importance of multi-stakeholder collaborations and is committed to supporting such efforts through multi-stakeholder landscape approaches, aiming to address systemic risks to sustainability in high-risk supply sheds.

6 Certification schemes

ISF supports the Roundtable on Sustainable Palm Oil (RSPO) as a certification scheme that is widely accepted as an assurance system for sustainable palm oil. ISF also supports the introduction of country-specific and mandated certification systems that are gaining wider acceptance, including the Malaysian Sustainable Palm Oil (MSPO) certification. All our facilities are RSPO and MSPO (for facilities in Malaysia) Supply Chain Certified. We actively encourage our customers to source certified palm oil through our fully segregated capability that ensures full traceability to origin.

7 Use of chemicals

ISF aims to reduce the use of chemicals and fertilisers within the supply chain and promote the best farming and agricultural practices in line with its food safety requirements and sustainability commitments. Prohibited chemicals are listed as follows unless in exceptional pest outbreak situations:

- Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.

8 Climate Action & Greenhouse Gas (GHG) Emissions Reduction

ISF is committed to reducing our GHG emissions and reports our progress towards the established time-bound targets for progressive reductions. Our continuous efforts toward this goal include embedding sustainability practices across our operations and activities, including:

- Identify and reduce emissions across all elements within our supply chain such as energy, water, waste, and social aspects.
- Collaboration with suppliers and stakeholders to adopt emissions reduction initiatives.
- Assessing climate risks to ISF's operations and supply chain and implementing climate adaptation strategies to safeguard productivity and sustainability.
- Supporting ecosystem conservation and reforestation projects as part of a broader climate mitigation strategy.

9 Transparency

ISF is committed to communicating transparently and continually with all its stakeholders on its progress towards a fully sustainable supply chain for palm products. In line with this, ISF has published this Policy publicly on its website and will communicate action plans for policy implementation to its stakeholders.

We will also report periodically on our progress and seek to establish methods for efficient communication on our supply chain and related commitments via our [website](#).

10 Grievance management

ISF takes complaints and grievances against its operations and those of its suppliers seriously. ISF has established a complaint handling and [grievance management mechanism](#) that is accessible to stakeholders and allows ISF to resolve grievances in a fair, timely, and transparent manner, with relevant stakeholder input where appropriate. As members of RSPO, we will follow the RSPO grievance process for relevant grievances. We will communicate transparently on outstanding grievances in line with our grievance management procedures. ISF prioritises the protection of confidentiality and anonymity of human rights defenders, whistleblowers, complainants, and community spokespersons when raising grievances.

11 Ethics and Code of Conduct

ISF is committed to upholding ethical conduct in how it does business with its customers, suppliers, government, civil society, and other stakeholders. We do not condone corruption in all its forms and expect our suppliers to adhere to our anti-corruption and bribery requirements. All our suppliers shall comply with our Code of Conduct which incorporates all elements of this Policy. Our full Code of Conduct will be made available publicly on our website.

We will ensure that all palm products that ISF sources, processes, and trades are in line with these commitments through the implementation of suppliers' Code of Conduct, supplier engagement, and third-party verification. ISF continues to communicate and engage with its suppliers on the progress and work together to resolve any challenges.

A handwritten signature in black ink, appearing to read 'Toshio Fujimori', with a large, stylized loop at the end.

Toshio Fujimori

Chief Executive Officer

Date: 1st April 2025