



Supplier Grievance Register

Updated on 25/03/2019

	Group Company	Issues	Buying Relationship	Presence in Sime Darby Plantation's Global Supply Chain	Summary of Actions and Findings	Reported By
1.	Anglo Eastern Plantations	<p>Reports of deforestation and land conflicts in the following operations:</p> <ul style="list-style-type: none"> - PT Kahayan Agro Plantation (PT KAP) <p>Suspected of sourcing non-compliant material from PT Guntur Madu Agrotama (PT GMA)</p>	Indirect via third party traders	SD Oils South Africa	<p>PT Kahayan Agro Plantation is not specifically in our supply chain, although other affiliated Anglo Eastern Plantation mills are.</p> <p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - Review of HCV report of PT Kahayan Agro Plantation (KAP) conducted. - Agreement to a moratorium on land clearing achieved. - HCS assessment commissioned for PT KAP and report being peer reviewed. - Monthly monitoring of commitment to the moratorium on land clearing. - Confirmation received that PT KAP are not sourcing from PT Guntur Madu Agrotama (PT GMA). 	Mighty Earth Greenpeace
2.	Bumitama / Lim Hariyanto Family	<p>Reports of deforestation, peat clearance and fires, in the following operations:</p> <ul style="list-style-type: none"> - PT Andalan Sukses Makmur (PT ASMR) - PT Bumitama Gunajaya Abadi (PT BGA) - PT Damai Agro Sejahtera (PT DAS) 	Indirect via third party traders	SD Oils South Africa	<p>These three operations are not specifically in our supply chain, although other affiliated Bumitama mills are.</p> <p>Third party traders and Bumitama have relevant NDPE policies. Bumitama is also reporting regularly on progress of issues raised:</p> <ul style="list-style-type: none"> - PT ASMR issues have been closed - PT BGA issues are closely monitored via RSPO complaints facility - PT DAS clarification available at: http://www.bumitama-agri.com/asset/upload/storage/report/News%20Release%20%20PT%20DAS%20clarification.pdf <p>Bumitama updates available at: http://www.bumitama-agri.com/page/layout/22/9/grievance-procedure-updates</p>	Friends of the Earth Forest Hints Greenpeace



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3.	Central Cipta Murdaya / Hardaya Plantations Group	Reports of deforestation in the following operations: - PT Hardaya Inti Plantations	Indirect via third party traders	SD Oils Zwijndrecht	Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. The Hardaya Plantations Group now: - has a moratorium on land clearing, and are investigating assessments required for further development. - are seeking support to strengthen capacity to manage NDPE requirements. - are being monitored on a monthly basis by traders to ensure that they respect the moratorium on land clearing until NDPE requirements can be addressed.	Greenpeace
4.	Double Dynasty Group	Reports of deforestation and land conflict in the following operations: Radiant Lagoon Sdn Bhd	Direct purchases and indirect via third party traders	SD Oils Bintulu SD Oils Carey Island KCP SD Oils Zwijndrecht SD Oils South Africa	Radiant Lagoon Sdn Bhd is not specifically in our supply chain, although other mills affiliated to the Double Dynasty Group are. We are investigating this case and initiating engagement with the supplier. Our current understanding is: - 4,400ha of forest has been cleared. - Further clearing has been stopped due to a combination of local community protests and directives by Malaysian authorities.	Mighty Earth
5.	Evershine Asset Management / Everbright Resources Corporation	Reports of deforestation and peat clearing in the following operations: PT Kapuasindo Palm Industry	Direct purchases	SD Oils Bintulu	PT Kapuasindo Palm Industry entered our supply chain via a direct spot purchase in 3Q 2018. There are no plans to continue further purchases from them.	Mighty Earth
6.	Felda Global Ventures (FGV)	Reports of deforestation and peatland clearing in Kalimantan, Indonesia, as well as, labour issues	Direct purchases and indirect via third party traders	SD Oils Bintulu SD Oils Port Klang SD Oils Langat SD Oils Zwijndrecht SD Oils South Africa	We have been engaging with FGV directly. Current updates on their progress on social and labour issues include:	Wall Street Journal Greenpeace Mighty Earth



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		in Malaysian operations.			<p>- FGV adopted a Social Compliance & Human Rights Action Plan in August 2017.</p> <p>- FGV developing plans to address directives from the RSPO Complaints panel.</p> <p>While we are not supplied by FGV's Indonesian operations, we have been engaging with FGV directly on the cases in Kalimantan, Indonesia. Current updates on their progress on these cases include:</p> <p>- FGV have a stop work order in place at PT Temila Agro Abadi, PT Citra Niaga Perkasa and Asian Plantation Limited.</p> <p>- HCS assessments have been commissioned and a peat restoration plan published.</p> <p>FGV is also reporting publicly on progress. Regular updates can be found at: http://www.fgvholdings.com/sustainability/stakeholderengagement/sustainability-updates/</p>	



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7.	GAMA/GANDA Group	<p>Reports of deforestation and peatland clearing in the following operations:</p> <ul style="list-style-type: none"> - PT Agrinusa Persada Mulia (PT APM) - PT Agriprima Cipta Persada (PT ACP) - PT Graha Agro Nusantara (PT GAN) 	Indirect via third party traders	SD Oils South Africa	<p>The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated GAMA/GANDA mills are.</p> <p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - Two companies suspected of association with the GAMA/GANDA Group were previously in our supply chain, however, we have been advised that they have been suspended pending confirmation of their independence from the GAMA/GANDA Group. - In the meantime, third party traders are engaging with the GAMA/GANDA group on an NDPE timebound action plan, as well as, monitoring their commitment to a moratorium on expansion. 	<p>Environmental Investigation Agency Greenpeace Mighty Earth</p>



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8.	Genting Plantations	<p>Reports of deforestation, peat clearance, illegal planting and land conflicts in the following operations:</p> <ul style="list-style-type: none"> - PT Dwie Warna Karya (PT DWK) - PT Kapuas Maju Jaya (PT KMJ) - PT Permata Sawit Mandiri (PT PSM) - PT Susantri Permai (PT SP) - PT Varita Majutama (PT VM) 	Indirect via third party traders	SD Oils Zwijndrecht SD Oils Pasir Gudang	<p>The operations highlighted in reports are not specifically in our supply chain. However, other affiliated Genting Plantation mills are.</p> <p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - In March 2017, Genting disposed of their shareholding in PT PSM. PT PSM had allegedly cleared HCS areas. - Potential HCS clearing detected on their PT Citra Sawit Cemerlang plantation in West Kalimantan in October 2018. Upon investigation by Genting Plantation, the clearing is by a neighbouring company and is beyond their boundaries. - Cases on PT DWK, PT KMJ and PT SP are being monitored via the RSPO Complaints process. 	Environmental Investigation Agency Borneo Orangutan Survival Foundation
9.	Incasi Group	<p>Reports of deforestation and peat clearing in PT Sumatera Jaya Agro Lestari (PT SJAL)</p>	Indirect via third party traders	SD Oils South Africa	<p>The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated Incasi Group mills are.</p> <p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - Dialogue initiated with PT SJAL in August 2015. - Agreed to a stop work order from 1 September 2015, pending HCV and HCS assessments. - In October 2018, Mighty Earth published a report on land clearing activities at PT SJAL. It was discovered that PT SJAL had accidentally cleared the area. PT SJAL immediately ceased the land clearing and reiterated their commitment to a moratorium on clearing, pending HCV and HCS assessments. 	Mighty Earth



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					<ul style="list-style-type: none"> - PT SJAL is expected to submit a recovery/rehabilitation plan commensurate with the scale of their non-compliant development. - Monthly monitoring conducted by third party traders. 	
10.	IOI	<p>Reports of deforestation, peat clearing, illegal road construction, labour issues and land conflicts in the following operations:</p> <ul style="list-style-type: none"> - IOI Pamol - IOI Pelita - PT Kalimantan Prima Agro Mandiri - PT Sukses Karya Sawit - PT Berkat Nabati Sawit - PT Bumi Sawit Sejahtera - PT Sawit Nabati Agro 	Indirect via third party traders	SD Oils Pasir Gudang SD Oils Zwijndrecht	<p>Third party traders have relevant NDPE policies and we have been monitoring their engagement with IOI.</p> <p>IOI are also actively reporting on these issues. Current updates on their progress is available at: https://www.ioigroup.com/Content/S/PDF/Grievance_others.pdf</p>	<p>Finnwatch Greenpeace AidEnvironment Local communities</p>
11.	Jhonlin Group	<p>Reports of deforestation, peat clearing, land conflicts, labour issues and excessive use of force in the following operations:</p> <ul style="list-style-type: none"> - PT Senabangun Aneka Pertiwi - PT Jhonlin Agro Mandiri 	Direct purchases	SD Oils Pulau Laut	The operations highlighted in reports are not specifically in our supply chain, however other mills affiliated with the Jhonlin Group are. We are investigating the allegations and initiating engagement with the supplier.	Mighty Earth



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		<ul style="list-style-type: none"> - PT Jhonlin Agro Lestari - PT Jhonlin Bumi Bersujud - PT Multi Sarana Agro Mandiri - PT Kodeco Agro Mandiri - PT Pradiksi Gunatama 				
12.	Matahari Kahuripan Lestari (Makin)	Reports of deforestation in PT Krida Dharma Kahuripan (PT KDK)	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	<p>PT KDK is not specifically in our supply chain, however other mills affiliated with Makin are.</p> <p>Third party traders have relevant NDPE policies and we are initiating engagement with them on this case.</p>	Mighty Earth
13.	Medco Group	Reports of deforestation and land conflicts in PT Medco Papua Hijau Selaras (PT MPHS).	Indirect via third party traders	SD Oils Zwijndrecht	<p>PT MPHS is not specifically in our supply chain, however one mill affiliated with the Medco Group entered our supply chain in 1Q 2018 via a single spot purchase from a third party trader.</p> <p>Third party trader has relevant NDPE policies and Medco mills have not entered our supply chain since.</p>	Environmental Investigation Agency
14.	Musirawas / Asam Jawa Group	Reports of peat clearing in PT Sumur Pandanwangi (PT SP)	Indirect via third party traders	SD Oils South Africa	<p>PT SP is not specifically in our supply chain, however other mills affiliated with the Musirawas / Asam Jawa Group are.</p> <p>Third party trader has relevant NDPE policies and ceased buying from the Musirawas / Asam Jawa Group in August 2018.</p>	Mighty Earth



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15.	Prosper / Tee family	Reports of deforestation and land conflicts in Bewani Oil Palm Plantations.	Indirect via third party traders	SD Oils Zwijndrecht SD Oils Pasir Gudang	<p>Bewani Oil Palm Plantations are not specifically in our supply chain, however other mills affiliated with Prosper/Tee family are.</p> <p>Third party traders have relevant NDPE policies and we have initiated engagement with them on this case. It has been advised that the minority shareholder in the Prosper Group with shareholding in the Bewani Oil Palm Plantation has divested from the project. There are no longer any links between the Prosper Group and the Bewani Oil Palm Plantation.</p>	Greenpeace
16.	PT Inti Indosawit Subur Ukui 1 and 2 (PT IISU 1 and 2)	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SD Oils Zwijndrecht	<p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - PT Inti IISU 1 & 2 acknowledged that a third party trader had supplied FFB sourced from the area concerned and suspended the trader in May 2018. - They have improved the Traceability Master Database of its entire third party supply chain which enables them to monitor the source of incoming supplies. - Suppliers are also required to sign a statement that commits FFB suppliers to source only from legal areas and to prevent the inclusion of illegal FFB in their supply to the mills belonging to PT IISU 1 & 2. <p>See their response at: https://www.apicalgroup.com/sustainability/grievances/tnnp-eof-2018/</p>	Eyes on the Forest



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17.	PT Makmur Andalan Sawit	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SD Oils Zwijndrecht	<p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - facilitating a verification visit by TFT, and agreement on an action plan in 2016. - Agreement to participate in a traceability to plantation pilot project in 2017. - 100% traceability to plantation for supplies is expected to be achieved by end July 2019. This will allow them to demonstrate that supplies do not originate from Tesso Nilo and Bukit Tigapuluh national parks. 	Eyes on the Forest
18.	PT Sawit Mas Nusantara (PT SMN)	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SD Oils South Africa	<p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - PT SMN has denied allegations of deforestation in national parks. - Upon investigation insufficient evidence was found to substantiate the allegations. - It was confirmed that PT SMN's sources of FFB does not include concessions indicated by Eyes on the Forest. - 100% traceability to plantation for supplies is expected to be achieved by end July 2019. This will allow them to demonstrate that supplies do not originate from Tesso Nilo and Bukit Tigapuluh national parks. 	Eyes on the Forest
19.	PT Surya Panen Subur II (PT SPS II)	Reports of deforestation and peat clearing in the Leuser Ecosystem.	Indirect via third party traders	SD Oils South Africa	<p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. Current updates on their progress include:</p> <ul style="list-style-type: none"> - PT SPS II committed to a moratorium on peatland clearing in 2015 and have been implementing best management practices for peatland plantations. 	Rainforest Action Network



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					<p>- Our third party trader's monitoring of PT SPS II's operations has identified pockets of land clearing in their concession, which has been due to community encroachment. PT SPS II themselves have continued to maintain a moratorium on the area.</p> <p>- To deal with the illegal encroachment, PT SPS II has reported the following actions:</p> <ol style="list-style-type: none"> 1. Engagement with surroundings communities. 2. Reached out to Government Land Authority requesting for enforcement of PT SPS II's land use right. 3. Conducted land Tenure Study/Participatory mapping. 4. Filed police reports on the ongoing illegal encroachment. 5. Transparently reported the encroachment/illegal occupation issues to the Governor of Aceh. <p>- A recent development is that on the 13th July 2018, officials from the Indonesia Ministry of Environment and Forestry (KLHK) conducted a field verification to SPS II, where the officials visited disputed area including area allegedly cleared by illegal encroachers.</p> <p>- On land conflicts, PT SPS II is working with TFT to seeking resolution with the local communities. A Collaboration For Transformation programme was launched in 2017 to address the land tenure issues between PT SPS II and the local communities.</p> <p>- On the use of fire for land clearing, there have been a few mistakes recently:</p> <ol style="list-style-type: none"> 1. In 2016, PT SPS II were found not guilty by the Indonesian High Court for the allegation of use of fire for land clearing. 2. In June 2018, officers from PT SPS II were convicted for using fire to clear peatland (http://aceh.tribunnews.com/2018/06/26/jaksa-tahanmanajer-kebun-pt-sps) 	



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					- Third party trader continues to support the progress made by PT SPS II, but has decided to stop purchasing from them in June 2018. No longer in our supply chain.	
20.	Rimbunan Hijau (RH)	Reports of deforestation and peat clearing in operations in Papua New Guinea and Sarawak.	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	<p>Gilford Ltd, RH's operation in Papua New Guinea is not specifically in our supply chain. However, other affiliated mills from RH's Malaysian operations are.</p> <p>Third party traders have relevant NDPE policies and we are initiating engagement with them on this case. Current report on progress includes:</p> <ul style="list-style-type: none"> - Engagement with RH initiated in September 2018. - Gilford Ltd, RH's operations in Papua New Guinea, committed to adhering to an NDPE policy and shared relevant information for further investigation. - Third party trader in the process of analysing the information provided and may verify with a field visit. - Moratorium on further clearing is in place while engagement is ongoing. 	Greenpeace
21.	Salim Group	<p>Reports of deforestation, peat clearance and land conflicts in the following operations:</p> <ul style="list-style-type: none"> - PT Anekareksa International (PT AI) - PT Bintuni Agro Prima Perkasa (PT BAPP) - PT Cahaya Agro Pratama (PT CAP) - PT Duta Rendra Mulya (PT DRM) 	Indirect via third party traders	SD Oils Zwijndrecht	<p>The Salim Group were historically in the supply chain of our SD Oils South Africa refinery via a third party trader who stopped buying from them in 2017.</p> <p>The Salim Group re-entered our supply chain in 1Q 2018 via two spot purchases from different third party traders. This time in the supply chain of our SD Oils Zwijndrecht refinery. These third party traders have NDPE policies in place and the Salim Group has not entered our supply chain since these spot purchases.</p>	Greenpeace Rainforest Action Network Mighty Earth Environmental Investigation Agency



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		<ul style="list-style-type: none"> - PT Menara Wasior (PT MW) - PT Rimbun Sawit Papua (PT RSP) - PT Salim Ivomas Pratama Tbk (SIMP) - PT Subur Karunia Raya (PT SKR) 				
22.	Samling / Glenealy Plantations	Reports of deforestation in Myanmar Stark Prestige Plantation (MSPP), operations in Sarawak, Malaysia and in Papua New Guinea.	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	<p>Myanmar Stark Prestige Plantation specifically is not in our supply chain, however other mills affiliated with Samling / Glenealy Plantations are.</p> <p>Third party traders have relevant NDPE commitments and programmes. Current updates on progress of their engagement with Samling / Glenealy include:</p> <ul style="list-style-type: none"> - They are not sourcing from their operations in Papua New Guinea or Myanmar. Supplies come from operations in Malaysia. - Moratorium on new developments agreed to, pending relevant HCV and HCS assessments. - Site visit conducted to check on allegations of deforestation in their operations in Sarawak. No new oil palm development found in area under scrutiny. - Monthly monitoring by third party trader to ensure compliance with NDPE requirements. 	Greenpeace Environmental Investigation Agency
23.	Shin Yang Group / Sarawak Oil Palm (SOP)	Reports of deforestation in operations in Sarawak, Malaysia.	Indirect via third party traders	SD Oils Zwijndrecht	<p>Third party traders have relevant NDPE policies and commitments. Current updates from their engagement with SOP include:</p> <ul style="list-style-type: none"> - Acknowledgement that SOP had non-compliances in their operations between 2016 - 2017. 	Mighty Earth



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					<ul style="list-style-type: none"> - In 2018, SOP expressed commitment to NDPE and third party traders have been supporting them in their journey towards implementing a holistic action plan across their supply chain, which in phases will also look into their third party sourcing. - Priority is to ensure new clearings comply with NDPE commitments. - In March 2018, their Sepakau mill and supply base underwent an assessment by third party traders' consultants and in September 2018, an NDPE workshop was hosted for their team and third party suppliers. 	
24.	TH Plantations	Reports of deforestation and peat clearing in PT Persada Kencana Prima (PT PKP).	Direct purchases and indirect via third party traders	SD Oils Bintulu SD Oils Pasir Gudang SD Oils Zwijndrecht SD Oils South Africa	<p>PT PKP is not specifically in our supply chain, however other mills affiliated with TH Plantations are. Supplies from TH Plantations are predominantly via third party traders who have NDPE policies and commitments. Current updates include:</p> <ul style="list-style-type: none"> - Moratorium on land clearing at PT Persada Kencana Prima (PT PKP) in place. - Agreement for HCV and HCS assessments before any development. - Advised on the presence of a logging company in the area with an overlapping claim on the concession (Hak Izin Lokasi), who have been responsible for most of the clearing between September 2017 - February 2018. - On the report issued by Chain Reaction Research dated 27th July 2018 alleging breach of moratorium in PT PKP, TH Plantations have clarified that activities were related to stacking work in areas previously cleared and overgrown. The restacking works have now been put on hold until this issue is clarified with stakeholders. This includes a field investigation by third party suppliers, the results of which are currently being analysed. 	Greenpeace



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25.	Triputra Agro Persada Group	Reports of deforestation in PT Dwiwira Lestari Jaya (PT DLJ)	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	Triputra Agro Persada and Third party traders have relevant NDPE policies and commitments. HCV and HCS assessments conducted at PT DLJ in 2014 and 2016, show that the 56ha area highlighted in the Mighty Earth Rapid Response Report #12, is not located within their concession.	Mighty Earth