



Supplier Grievance Register

Updated on 17/03/2020

	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
1	Agro Sarimas Group	Reports of deforestation in PT Agro Sarimas	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	<p>Supply came through a 3rd party trader with NDPE commitments and an active supplier management programme. This includes the use of satellite monitoring to detect potential incidents of deforestation. Engagements with indirect supplier to investigate the allegations initiated.</p> <p>Updates from third party supplier who engaged with Agro Sarimas revealed that that land clearing was not conducted by PT Agro Sarimas as it happened outside their concession boundary (February 3, 2020).</p>	Mighty Rapid Response Report 22 (December 2019)	Resolved
2	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). - Some clearing detected in 1st half of 2019. Moratorium on clearing, until HCS peer review completed, reinforced in May 2019. - AEP has officially published their NDPE policy (July 19, 2019). - After the HCS peer review assessment in was completed and approved in December 2019. A complain was raised 	<p>Mighty Earth - Rapid Response Report 1 (Nov 2017)</p> <p>Greenpeace - Deforestation Case Studies (Dec 2017)</p> <p>Mighty Earth - Rapid Response Report 14 (Apr 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p> <p>Mighty Earth - Rapid Response Report 24 (Jan 2020)</p> <p>Mighty Earth - Rapid Response Report 25 (Mar 2020)</p>	Ongoing Monitoring & Engagement



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					by Mighty Earth in January 2020 on the peer review and HCSA changed their opinion on the classification of an area from Medium Priority Patch (MPP) area to High Priority Patch (HPP) . AEP has been asked to issue a stop work order. AEP is said to be appealing against the decision by HCSA (February 2020).		
3	Asian Agri	Potential deforestation detected in: - PT Usaha Sawit Unggul	Indirect via third party traders	SD Oils South Africa	PT Usaha Sawit Unggul is not specifically in our supply chain, although other Asian Agri mills are. Third party traders have investigated the deforestation report by Mighty Earth and confirmed that the clearing detected is not in the PT Usaha Sawit Unggul concession.	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved
4	Bakrie Group	Reports of deforestation in the following operations: - PT Menthobi Mitra Lestari	Indirect via third party traders	SD Oils South Africa	PT Menthobi Mitra Lestari is not specifically in our supply chain, although other affiliated Bakrie Group operations are. Upon investigation of the deforestation report by Mighty Earth, it was verified that the clearing detected was not located in PT Menthobi Mitra Lestari's concession. PT Bakrie Sumatera Plantations Tbk has now issued a public statement to the effect that 'PT Menthobi Mitra Lestari is no longer a part of PT Bakrie Sumatera Plantations Tbk or Bakrie Group since 2017. Therefore, the case is now resolved as confirmed with Mighty Earth (October 31, 2020). https://www.bakriesumatera.com/files/Pernyataan Perusahaan BSP 31012020.pdf	Mighty Earth - Rapid Response Report 16 (June 2019)	Resolved



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5	BBC Holdings Sdn Bhd	Reports of deforestation in the following operations: - Almamumi Plantation Sdn Bhd	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	Almamumi Plantation Sdn Bhd is not specifically in our supply chain, however other mill affiliated to BBC Holding Sdn Bhd is. Supplies from BBC Holding Sdn Bhd are predominantly via third party traders who have NDPE policies and commitments. We have started engagements to investigate the allegations. BBC Holdings is no longer in SDO's supply chain as our third-party trader has ceased sourcing from them.	Mighty Earth - Rapid Response Report 21 (Nov 2019)	No Longer in Supply Chain
6	Borneo Pacific Group	Reports of deforestation in the following operations: - PT Arjuna Utama Sawit	Indirect via third party traders	SD Oils South Africa	Supply came through a 3rd party trader with NDPE commitments and an active supplier management programme. Borneo Pacific is no longer in SDO's supply chain as our third-party trader has ceased sourcing from them.	Mighty Earth - Rapid Response Report 23 (January 2020)	No Longer in Supply Chain



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7	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	<p>SD Oils South Africa</p> <p>SD Oils Pemantang KCP</p>	<p>PT Bumitama Gunajaya Abadi supply came through a 3rd party trader. 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> <p>Further direct engagement with Bumitama confirmed that the areas located under the concession of PT Damai Agro Sejahtera (DAS) were not cleared but impacted by forest fires that struck the landscape of Sungai Putri forest during the peak of the dry season in September 2019. While the change in vegetation colour from the satellite imagery may seem as a result of land-clearing, the ground-truthing check identified varied extent of damage, from apparently un-impacted to scorched and burned vegetation. Bumitama News Release is available: http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7dcfe985a</p> <p>Bumitama's response regarding land clearing in PT Andalan Sukses Makmur (as reported in Mighty Earth Rapid Response Report No. 23) is that ground checking in PT ASMR and hotspot reports revealed 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 and excluded from the</p>	<p>Friends of the Earth - Up in Smoke Report (December 2015)</p> <p>Forest Hints - Article (April 2017)</p> <p>Mighty Earth Rapid Response Report #22 (December 2019)</p>	Resolved



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					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 Bunitama's 12 September 2014 Announcement: http://ir.bunitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7). January 15, 2020		
8	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	<p>Third party traders have relevant NDPE policies and we have been actively monitoring their engagement. The Hardaya Plantations Group now:</p> <ul style="list-style-type: none"> - 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. <p>PT Hardaya Inti Plantations entered our supply chain via a spot purchase in the 1st quarter 2018. Raw materials sourced from Central Cipta Murdaya / Hardaya Plantations Group have not entered our supply chain since then.</p>	Greenpeace - Deforestation Case Studies (December 2017)	No Longer in Supply Chain
9	Dhanista Surya Nusantara	Reports of deforestation in the following operations: - PT Sabhantara Rawi Sentosa	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	<p>PT Sabhantara Rawi Sentosa is not specifically in our supply chain. Engaging with our third party traders, who have relevant NDPE policies and procedures, on this case.</p> <p>The third-party trader who engaged with Dhanista Surya Nusantara advised that the reported land clearing was not conducted by the company, it happened outside their concession boundary (February 3, 2020).</p>	Mighty Earth - Rapid Response Report 21 (November 2019)	Resolved



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10	Dharma Satya Nusantara (DSN)	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Putra Utama Lestari (area 1) and (area 2) 	Indirect via third party traders	SD Oils South Africa	<p>PT Putra Utama Lestari is not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from Dharma Satya Nusantara are predominantly via a third party trader who have NDPE policies and commitments. We have started engagements to investigate the allegations.</p> <p>The third-party trader who engaged with Dharma Satya Nusantara advised that the reported land clearing was not conducted by the company, it happened outside their concession boundary (February 3, 2020).</p>	Mighty Earth Rapid Response Report #20 (Oct 2019)	Resolved
11	Djarum	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Gemilang Sawit Kencana (PT GSK) - PT Hartono Plantations Indonesia (PT HPI Agro) 	Indirect via third party traders	SD Oils South Africa	<p>PT Gemilang Sawit Kencana (PT GSK) and PT Hartono Plantations Indonesia (PT HPI Agro) are not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from Djarum affiliated mills are predominantly via a third party trader who have NDPE policies and commitments. Status of engagement includes:</p> <ul style="list-style-type: none"> - engagement with Djarum since December 2017 when the allegations of non-compliance with NDPE policies were raised. - Djarum committed to NDPE policy requirements and a moratorium on expansion, until relevant assessments are completed. - Monthly monitoring in place to ensure commitment to the moratorium. 	Greenpeace - Deforestation Case Studies (December 2017)	Ongoing Monitoring & Engagement



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12	Double Dynasty Group	<p>Reports of deforestation and land conflict in the following operations:</p> <ul style="list-style-type: none"> - Radiant Lagoon Sdn Bhd - Mutiara Pelita Genaan Plantation Sdn Bhd -DDB Bawan Plantation Sdn Bhd (Peat development and land conflict) 	Direct purchases and indirect via third party traders	<p>SD Oils Bintulu</p> <p>SD Oils Carey Island KCP</p> <p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>Radiant Lagoon Sdn Bhd and Mutiara Pelita Genaan Plantation Sdn Bhd are not specifically in our supply chain, although a mill affiliated to the Double Dynasty Group is.</p> <p>Status of engagement with Double Dynasty includes:</p> <ul style="list-style-type: none"> - 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. - this includes a 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. <p>Progress updates:</p> <ol style="list-style-type: none"> 1. Radiant Lagoon Sdn Bhd (ME Report #13) - DD has confirmed with local regulators on terminating their work in Radiant Lagoon. An environmental consultant has been appointed to carry out work to rehabilitate historical clearing. 2. Mutiara Pelita Genaan Plantation Sdn Bhd (ME Report #15) – DD confirmed that the alleged deforestation is not within Mutiara Pelita Genaan project boundary. 3. DDB Bawan Sdn Bhd (ME Report #21) - DD confirmed that they have a stop work order on all land clearing on the sites at DDB Bawan (Block 13 Lot 34 and Lot 35) and have agreed to conduct soil investigation to confirm the site is peat or not peat. Engagement with DD will continue while waiting for the soil investigation report. <ul style="list-style-type: none"> • HCV and HCS assessments is commencing to assess impact of land clearing activities. • LUCA will follow with further field verification to conduct soil assessments to identify potential areas of peat that they should avoid. 	<p>Mighty Earth - Rapid Response Report 13 (March 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p> <p>Mighty Earth - Rapid Response Report 21 (November 2019)</p>	Ongoing Monitoring & Engagement



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					<ul style="list-style-type: none"> Preliminary results of the soil assessment has been shared with us (February 2020). 		
13	Eagle High Plantation	<p>Reports of peat clearing, deforestation in the following operations:</p> <p>- PT Arrtu Energy Resources</p>	Indirect via third party traders	SD Oils South Africa	<p>PT Arrtu Energy Resources is not specifically in our supply chain, however other mill affiliated to Eagle High Plantation is. Supplies from Eagle High Plantation are via a third party trader who have NDPE policies and commitments. We have started engagements to investigate the allegations.</p> <p>Third-party trader reported that the area in question in PT Arrtu Energie Resources (AER) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. The fire outside PT AER's concession area has spread into their concession and caused the fire in PT AER during the dry period. (February 3, 2020).</p>	Mighty Earth - Rapid Response Report 22 (December 2019)	Resolved
14	Evershine Asset Management / Everbright Resources Corporation		Direct purchases	SD Oils Bintulu	PT Kapuasindo Palm Industry entered our supply chain via spot purchases. There are no plans to continue further purchases from them after 4th quarter 2018.	<p>Mighty Earth - Rapid Response Report 5 (June 2018)</p> <p>Mighty Earth - Rapid Response Report 6 (July 2018)</p> <p>Mighty Earth - Rapid Response Report 12 (Jan 2019)</p> <p>Mighty Earth - Rapid Response Report 17 (Jul 2019)</p> <p>Mighty Earth - Rapid Response Report 19 (Sep 2019)</p>	No Longer in Supply Chain



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15	Felda Global Ventures (FGV)	<p>Reports of deforestation and peatland clearing in Kalimantan, Indonesia, as well as, labour issues in Malaysian operations.</p> <p>- PT Temila Agro Abadi - PT Citra Niaga Perkasa</p>	Direct purchases and indirect via third party traders	<p>SD Oils Bintulu</p> <p>SD Oils Port Klang</p> <p>SD Oils Langat</p> <p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p> <p>SD Oils Pasir Gudang</p> <p>SD Oils Carey Island KCP</p>	<p>We have been engaging with FGV directly. Current updates on their progress on social and labour issues include:</p> <ul style="list-style-type: none"> - FGV adopted a Social Compliance & Human Rights action Plan in August 2017. - FGV developing plans to address directives from the RSPO Complaints panel. <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> <ul style="list-style-type: none"> - FGV have a stop work order in place at PT Temila Agro Abadi, PT Citra Niaga Perkasa and Asian Plantation Limited. - HCS assessments have been commissioned and a peat restoration plan published. <p>FGV is also reporting publicly on progress. Regular updates can be found at: http://www.fgvholdings.com/sustainability/stakeholder-engagement/sustainability-updates/</p>	<p>Wall Street Journal - Article (July 2015)</p> <p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Mighty Earth - Rapid Response Report 9 (October 2018)</p> <p>Mighty Rapid Response Report #20 (Oct 2019)</p>	Ongoing Monitoring & Engagement



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16	First Resources / PT Fangiono Agro Plantation (PT FAP) / Ciliandry Anky Abadi (CAA) Group	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Agrindo Green Lestari - PT Citra Agro Abadi - PT Ketapang Hijau Lestari - PT Mitra Karya Sentosa - PT Ketapang Agro Lestari - PT Tirta Madu Sawit Jaya 	Indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated mills were.</p> <p>Third party traders have relevant NDPE policies. Related mills entered our supply chain via two spot purchases in 1Q 2019.</p> <p>Engagement by third-party trader with PT Ketapang Agro Lestari revealed that HCS/HCV assessment has been duly conducted prior the land clearing. The land development was guided by the outcome of the HCV/HCS assessment. No HCV/HCS area has been cleared (February 3, 2020).</p> <p>After engaging with PT Tirta Madu Sawit Jaya, the third-party trader advised that the reported land clearing was not conducted by the company as it happened outside their concession boundary (February 3, 2020).</p>	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Mighty Earth - Rapid Response Report 9 (October 2018)</p> <p>Mighty Rapid Response Report 21 (Nov 2019)</p> <p>Mighty Earth Rapid Response Report 22 (December 2019)</p>	Ongoing Monitoring & Engagement



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17	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	<p>SD Oils South Africa</p> <p>SD Oils Zwijndrecht</p>	<p>The operations with reports of deforestation and peatland clearing are not specifically in our supply chain. However, other affiliated GAMA/GANDA mills were.</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"> - GAMA/GANDA Group were suspended in June 2018 by our third party trader. - In September 2018 GAMA/GANDA published a sustainability policy and in February 2019 a progress report on the implementation of this policy (http://gamaplantation.com/assets/gama-files/pressrelease/Feb2019final-Gama_Plantation_Report.pdf). This includes an outline of recovery plans to address historical clearing. - Following a review of progress made, the suspension on GAMA/GANDA was lifted by our third party trader in March 2019. - We continue to monitor the ongoing progress of their policy commitments. <p>KPN Progress Report updates – October 2019</p> <ul style="list-style-type: none"> - 1. The Stop Work Order (SWO) is adhered to and monitoring is in place. - 2. A comprehensive NDPE policy is being implemented. - 3. Concession maps are shared at the request of interested parties. - 4. Recovery Plans and Remediation work is being implemented which also include various socio-economic activities for the community. - 5. Implementation a traceability system to ensure the legality of externally purchased FFB - 6. ISPO certifications is in progress. - 7. A grievance procedure to manage grievances and 	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Mighty Earth - Rapid Response Report 3 (February 2018)</p> <p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Mighty Earth - Rapid Response Report 20 (October 2019)</p>	Resolved



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					<p>concerns has been adopted.</p> <ul style="list-style-type: none">- 8. A Time Bound Action Plan (60 month) is available on their website.- Further details can be found in this link http://kpnplantation.com/assets/gama-files/pressrelease/2019_Oct_KPN_-_2nd_Progress_Report_-_01112019.pdf- Third-party trader's engagement with Gama confirmed that Gama has imposed a moratorium on land clearing July 2018, no land clearing was carried out since then. The area in question are outside PT Agrinusa Persada Mulia's HGU concession area. The land clearing was carried out by communities for farming; and by PT. BPUP (Bangun Bina Utama Papua) for road construction (February 3, 2020).		



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18	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 Kapuas Maju Jaya - PT Permata Sawit Mandiri - PT Susantri Permai - PT Varita Majutama - PT Citra Sawit Cemerlang 	Indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils Pasir Gudang</p> <p>SD Oils Langat</p> <p>SD Oils Liverpool</p> <p>SD Oils South Africa</p>	<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 Permata Sawit Mandiri (PT PSM). PT PSM had allegedly cleared HCS areas. PT PSM was purchased by Bintang Harapan Desa, but was subsequently sold on in November 2018. - Potential HCS clearing detected on their PT Citra Sawit Cemerlang plantation in West Kalimantan in 2019. PT CSC commissioned a High Carbon Stock (HCS) assessment in 2016, which was completed in October 2017. The HCS assessment has not however been peer reviewed. The HCS assessment has now been submitted for peer review and a stop work order has been implemented, pending the completion of the peer review process. Monthly monitoring is in place to assess the implementation of the stop work order. - Cases on PT Dwie Warna, PT Kapuas Maju Jaya and PT Susantri Permai being monitored via the RSPO Complaints process. 	<p>RSPO Complaints - Several (2013 -2018)</p> <p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Mighty Earth - Rapid Response Report 14 (April 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p>	Ongoing Monitoring & Engagement



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19	Global Palm Resources	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Prakarsa Tani Sejati 	Indirect via third party traders	SD Oils Zwijndrecht	<p>PT Prakarsa Tani Sejati (PT PTS) entered our supply chain via a spot purchase in the 1st quarter 2018. There has been no materials sourced from Global Palm Resources affiliated operations since.</p> <p>Out third party traders have relevant NDPE policies and their updates on engagements, include:</p> <ul style="list-style-type: none"> - Mighty Earth Rapid Response Report 14 alleged 62ha of deforestation by PT Prakarsa Tani Sejati (PT PTS) in West Kalimantan. - engagement with PT PTS in April 2019 and investigated the alleged deforestation. - the investigation concluded that the location of the clearing detected by Mighty Earth was not located in the PT PTS concession. This was clarified by the third party trader at: http://bit.ly/2v4XRca. 	Mighty Earth - Rapid Response Report 14 (April 2019)	Resolved
20	Goodhope	<p>Reports of deforestation in the following operations:</p> <ul style="list-style-type: none"> - PT Sumber Hasil Prima - PT RIM Capital 	Indirect via third party traders	SD Oils South Africa	<p>The alleged land clearing occurred as a result of land fires on community-owned areas on 20th September 2019. The company has submitted a report to local authorities which concluded that the alleged land clearing occurred as a result of land fires on community-owned areas that occurred in the vicinity of PT RIM Capital. PT. RIM Capital plans to support conservation of surrounding forest and mitigation of land fires through a number of initiatives which have been outlined.</p>	<p>Mighty Rapid Response Report 19 (Sep 2019)</p> <p>Mighty Rapid Response Report 22 (December 2019)</p>	Resolved



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21	Incasi Group	<p>Reports of deforestation and peat clearing in:</p> <ul style="list-style-type: none"> - PT Sumatera Jaya Agro Lestari - PT Arvena Sepakat - PT Makmur Agro Lestari 	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 Sumatra Jaya Agro Lestari (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 SJAL. It was discovered that SJAL had accidentally cleared the area. SJAL immediately ceased the land clearing and reiterated their commitment to a moratorium on clearing, pending HCV and HCS assessments. - 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. - Investigation on reported clearing by PT Arvena Sepakat revealed that the land clearing was not conducted by Arvena Sepakat. The area was illegally encroached and cleared by communities of Kelompok Sinaga. Police report has been lodged on the illegal encroachment (February 3, 2020). - PT Makmur Agro Lestari does not belong to Incasi Raya. MAL is located in West Kalimantan while the location of this report is located in Central Kalimantan. (February 3, 2020). 	<p>Mighty Earth - Rapid Response Report 10 (November 2018)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p>	Ongoing Monitoring & Engagement



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22	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 KPAM) - PT Sukses Karya Sawit - PT Berkat Nabati Sawit - PT Bumi Sawit Sejahtera - PT Sawit Nabati Agro 	Indirect via third party traders	<p>SD Oils Pasir Gudang</p> <p>SD Oils Zwijndrecht</p> <p>SD Oils Liverpool</p> <p>SD Oils Pasir Gudang</p>	<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_oters.pdf</p>	<p>Local communities - RSPO complaint (March 2010)</p> <p>AidEnvironment - RSPO complaint (April 2015)</p> <p>Finnwatch - Working Conditions at the IOI Group's Oil Palm Estates in Malaysia report (November 2016)</p>	Ongoing Monitoring & Engagement



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	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
23	Jhonlin Group/CB Industrial Product Holding	<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 Kurun Sumber Rezeki 	Direct purchases	<p>SD Oils Pulau Laut</p> <p>SD Oils Rantau KCP</p>	<p>The operations highlighted in reports are not specifically in our supply chain, however other mills affiliated with the Jhonlin Group are.</p> <p>Following engagements with the Jhonlin Group, they have agreed to a stop work order in their concessions. We are now providing guidance on the High Conservation Value and High Carbon Stock assessments that need to be conducted before further development commences.</p> <p>Monthly monitoring is also in place to assess the implementation of the stop work order.</p> <p>Investigation on allegations of clearing by PT Kurun Sumber Rezeki ongoing.</p>	<p>Mighty Earth - Rapid Response Report 9 (October 2018)</p> <p>Mighty Earth - Rapid Response Report 11 (December 2018)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p>	Investigating
24	Kalimantan Sawit Kusuma Group	<p>Reports of deforestation and peat clearing, in the following operations:</p> <ul style="list-style-type: none"> - PT Fajar Saudara Lestari 	Indirect via third party traders	SD Oils South Africa	<p>Engaging with our third party traders, who have relevant NDPE policies and procedures, on this case.</p> <p>Third-party trader who engaged with Kalimantan Sawit Kusuma Group advised that the area in question in Fajar Saudara Lestari (PT FSL) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. Fire outside PT FSL concession area has spread into their concession and cause the fire in PT FSL during the dry period (February 3, 2020).</p>	Mighty Earth - Rapid Response Report 22 (December 2019)	Resolved
25	Kencana Agri	<p>Potential deforestation in:</p> <ul style="list-style-type: none"> - PT Agro Sawit Mas Lestari 	Indirect via third party traders	<p>SD Oils Pulau Laut</p> <p>SD Oils South Africa</p>	<p>The operation highlighted is not specifically in our supply chain, however other mills affiliated with the Kencana Agri Group are.</p> <p>Upon investigation, the clearing reported by Mighty Earth by PT Agro Sawit Mas Lestari was located outside of their operations.</p>	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved



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	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
26	KLK Berhad	<p>Reports of peat clearing in:</p> <ul style="list-style-type: none"> - PT Menteng Jaya Sawit Perdana 	Indirect via third party traders	<p>SD Oils Pasir Gudang</p> <p>SD Oils Zwijndrecht</p> <p>SD Oils Liverpool</p> <p>SD Oils South Africa</p>	<p>PT Menteng Jaya Sawit Perdana is not in our supply chain, however other KLK mills are.</p> <p>The clearing detected by Mighty Earth was in a Community Forest Plantation that was gazetted by the Indonesian authorities. This is an area that KLK has no control over.</p> <p>KLK's public response on this allegation is available on their website: https://www.klk.com.my/sustainability/market-place/grievance/</p>	Mighty Earth - Rapid Response Report 18 (Aug 2019)	Resolved
27	Matahari Kahuripan Lestari (Makin)	<p>Reports of deforestation in:</p> <ul style="list-style-type: none"> - PT Krida Dharma Kahuripan - PT Mekar Karya Kahuripan 	Indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>PT Krida Dharma Kahuripan and PT Mekar Karya Kahuripan are 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 engaging with them on these cases. Updates as follows:</p> <ul style="list-style-type: none"> - PT Krida Dharma Kahuripan clearing was not conducted by Makin. Makin returned the location permit for the concession to the local government in 2017. - Makin clarified that as a business, PT Mekar Karya Kahuripan was shut down in 2016. The clearing detected was not related to the Makin Group. 	<p>Mighty Earth - Rapid Response Report 5 (June 2018)</p> <p>Mighty Earth - Rapid Response Report 6 (July 2018)</p> <p>Mighty Earth - Rapid Response Report 11 (December 2018)</p> <p>Mighty Earth - Rapid Response Report 12 (January 2019)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p>	Resolved
28	Medco Group	<p>Reports of deforestation and land conflicts in PT Medco Papua Hijau Selaras.</p>	Indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>PT Medco Papua Hijau Selaras entered SD Oils South Africa supply chain via a third party trader who have relevant NDPE policies. Investigation on allegations on PT Medco Papua Hijau Selaras is ongoing.</p> <p>PT Medco Papua Hijau Selaras has been divested to another party called Capitol Group.</p>	<p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Mighty Rapid Response Report #25</p>	Investigating



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29	Musirawas / Asam Jawa Group	Reports of peat clearing in PT Sumur Pandanwangi.	Indirect via third party traders	SD Oils South Africa	<p>PT Sumur Pandanwangi 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>	<p>Mighty Earth - Rapid Response Report 6 (July 2018)</p> <p>Mighty Earth - Rapid Response Report 10 (November 2018)</p> <p>Mighty Earth - Rapid Response Report 11 (December 2018)</p>	No Longer in Supply Chain
30	Nurdin Tampubolon Corporation (NT Corp)	Reports of deforestation in PT Bintang Sakti Lenggana	Indirect via third party traders	SD Oils South Africa	<p>PT Bintang Sakti Lenggana is not specifically in our supply chain.</p> <p>Third party trader has relevant NDPE policies and we have initiated engagement with them on this case.</p> <p>Third-party trader informed that preliminary investigation reveals that PT Bintang Sakti Lenggana is not under the management control of NT Corp. The case is still under investigation to verify the group ownership structure (February 20, 2020).</p>	Mighty Earth - Rapid Response Report 19 (Sep 2019)	Investigating
31	Peputra Group	<p>Potential deforestation in:</p> <ul style="list-style-type: none"> - PT Marita Makmur Jaya 	Indirect via third party traders	<p>SD Oils South Africa</p> <p>SD Oils Zwijndrecht</p>	<p>PT Marita Makmur Jaya is not specifically in our supply chain, however other potentially affiliated mills are.</p> <p>Third party traders have relevant NDPE policies and we have initiated engagement with them on this case. They are currently investigating the links between PT Marita Makmur Jaya and the Peputra Group.</p> <p>Upon investigation, third-party trader informed that PT Marita Makmur Jaya is not under the management control of Peputra Group.</p>	Mighty Earth - Rapid Response Report 12 (January 2019)	Resolved



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32	Perkebunan Nusantara	Reports of deforestation in: - PT Perkebunan Nusantara II Prafi	Indirect via third party traders	SD Oils South Africa	<p>Mighty Earth Rapid Response Report 15 alleges 18ha of forests cleared by PT Perkebunan II Prafi in West Papua. This operation is not specifically in our supply chain.</p> <p>However, a potentially affiliated company, PT Perkebunan Nusantara XIII (Pelahari), is in our supply chain via a third party trader. Trader has relevant NDPE policies.</p> <p>Third-party trader advised that the results from their engagement and investigation reveals that PT Perkebunan Nusantara II Prafi has been divested since 2014 (February 3, 2020).</p>	Mighty Earth - Rapid Response Report 15 (May 2019)	No Longer in Supply Chain
33	Pinehill Pacific Bhd	Reports of deforestation in: - PT Makmur Jaya Malindo	Direct purchases	<p>SD Oils Pasir Gudang</p> <p>SD Oils Port Klang</p> <p>SD Oils Biodiesel</p>	PT Makmur Jaya Malindo is not specifically in our supply chain, however a previously affiliated mill called Benta (Perak) Plantation is. Pinehill Pacific has since disposed off Benta (Perak) Plantation mill in 3Q 2019. Therefore, Pinehill Pacific is no longer in Sime Darby Plantation's supply chain.	Mighty Earth - Rapid Response Report 18 (Aug 2019)	No Longer in Supply Chain



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	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
34	Prosper / Tee family	Reports of deforestation and land conflicts in Bewani Oil Palm Plantations.	Direct purchases and indirect via third party traders	SD Oils Zwijndrecht SD Oils Pasir Gudang SD Oils Langat	<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> <p>The Prosper Group have also initiated steps for NDPE policies and implementation in their operations and third party sourcing.</p> <p>In November 2019, Prosper on behalf of their shareholder director concerned has prepared a LUCA and has acknowledged liability for the historical land clearing in PNG. They have agreed to undertake conservation programme as a recovery plan.</p>	Greenpeace - Final Countdown Report (September 2018)	Ongoing Monitoring & Engagement
35	PT Berlian Inti Mekar Rengat (BIMR)	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"> - a verification report was conducted by CORE (Consortium of Resource Experts; ProForest and Daemeter) in 2016 and a time-bound action plan was developed. - Eyes on the Forest's Enough is Enough 2018 report states that PT Berlian Inti Mekar Rengat has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2014. 	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved



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	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
36	PT Delima Makmur	Reports of community conflicts and links to PT Sisirau (suspended by the RSPO for clearing orangutan habitat).	Indirect via third party traders	SD Oils South Africa	<p>Engaging with our third party traders, who have relevant NDPE policies and procedures, on this case.</p> <p>PT Delima Makmur s is no longer in SDO's supply chain as our third-party trader has ceased sourcing from them.</p>	Leuser Watch Website RAN - Community Struggles for Land Rights and Livelihoods in Singkil-Bengkung region Nov 2019	No Longer in Supply Chain
37	PT Ensem Lestari	Reports of links to deforestation in the Leuser Ecosystem via 3rd party FFB	Indirect via third party traders	<p>SD Oils South Africa</p> <p>SD Oils Zwijndrecht</p>	<p>Engaging with our third party traders, who have relevant NDPE policies and procedures, on this case.</p> <p>Engagement by our third-party trader revealed that PT Ensem Lestari have been working on their traceability and NDPE action plan through their direct suppliers. There has not been any new reports of land clearing since the 2018 report.</p>	Leuser Watch Website RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018	Ongoing Monitoring & Engagement
38	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 Indosawit Subur Ukui 1 & 2 acknowledge 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 Inti Indosawit Subur Ukui 1 & 2. <p>See their response at: https://www.apicalgroup.com/sustainability/grievances/tn-np-eof-2018/</p>	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved

	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
39	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. <p>MAS confirms no illegal FFB was received and monitoring is in place to block such FFB into their supply chain. They have joined WWF "HALT" programme and have since achieved 100% traceability to plantation (February 2020).</p>	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved
40	PT Mitra Unggul Pusaka Segati (MUPS)	Reports of deforestation and clearing in Tesso Nilo and Bukit Tigapuluh national parks	Indirect via third party traders	SD Oils Zwijndrecht	Eyes on the Forest's Enough is Enough 2018 report states that PT Mitra Unggul Pusaka Segati has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2012.	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved
41	PT Nafasindo	Allegations of community conflicts	Indirect via third party traders	SD Oils South Africa	Engaging with our third party traders, who have relevant NDPE policies and procedures, on this case.	Leuser Watch Website RAN -Community Struggles for Land Rights and Livelihoods in Singkil-Bengkung region November 2019	Investigating

	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
42	PT Peputra Supra Jaya (PSJ)	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 actively monitored their engagement on this case. Key highlights include:</p> <ul style="list-style-type: none"> - verification visit by third party suppliers in 2016. - it was verified that the fire stated in EOF's report took place outside PSJ's concession. Despite this, PSJ agreed to enhance its fire prevention and management system. - agreed to a traceability to plantation pilot project at their mills in 2017. - PT Peputra Supra Jaya expected to achieve traceability to plantation for 100% of supplies 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's Enough is Enough 2018 report states that PT Peputra Supra Jaya has not received illegal FFB from Tesso Nilo and Bukit Tigapuluh national parks since 2015. 	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved
43	PT Runding Putra Persada	Reports of links to deforestation in the Leuser Ecosystem via 3rd party FFB	Indirect via third party traders	SD Oils South Africa SD Oils Zwijndrecht	Engaging with our third party traders, who have relevant NDPE policies and procedures, on this case.	Leuser Watch Website RAN - Deforestation and Fires Continue to Destroy Precious Indonesian Rainforests April 2018	Investigating
44	PT Saraswanti Utama	<p>Reports of deforestation and peat clearing in:</p> <ul style="list-style-type: none"> - PT Saraswanti Agro Estate 	Direct purchases	SD Oils Pulau Laut SD Oils Rantau KCP	<p>PT Saraswanti Agro Estate is not specifically in our supply chain. However, other operations affiliated with the parent company, PT Saraswanti Utama, were in our supply chain via spot purchases.</p> <p>No further spot purchases from the Saraswanti Group have been made since February 2019.</p>	Foresthints - Palm Oil News Post (February 2019)	No Longer in Supply Chain



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45	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. <p>Update February 2020:</p> <ul style="list-style-type: none"> - PT SMN have achieved 100% traceability to plantations to prove they are not sourcing FFB from illegal sources. 	Eyes on the Forest - Enough is Enough Report (June 2018)	Resolved
46	PT Surya Panen Subur 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. - 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. - To deal with the illegal encroachment, PT SPS II has reported the following actions: <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. 	Rainforest Action Network - Last Place on Earth Report (November 2014)	No Longer in Supply Chain



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					<p>3. Conducted land Tenure Study/Participatory mapping.</p> <p>4. Filed police reports on the ongoing illegal encroachment.</p> <p>5. Transparently reported the encroachment/illegal occupation issues to the Governor of Aceh.</p> <p>- 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:</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-tahan-manajer-kebun-pt-sps) <p>- 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.</p>		

	Group Company	Issues	Buying Relationship	Presence in Sime Darby Oils' Global Supply Chain	Summary of Actions and Findings	Reported By	Case Status
47	QL Resources	<p>Potential deforestation detected in PT Pipit Mutiara Indah.</p> <p>Reports of land prepared for clearing (stacking lines) in the PT Pipit Mutiara Indah concession.</p>	Indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>Engaging with our third party traders, who have relevant NDPE policies and procedures, on this case.</p> <ul style="list-style-type: none"> PT Pipit Mutiara Indah is no longer in SDO's supply chain as our third-party trader has ceased sourcing from them. (February 10, 2020). 	Mighty Earth - Rapid Response Report 21 (Nov 2019)	No Longer in Supply Chain
48	Rimbunan Hijau	<p>Reports of deforestation and peat clearing in operations in Papua New Guinea and Sarawak, including:</p> <ul style="list-style-type: none"> - Erajaya Synergy Sdn Bhd - Jaya Tiasa, LPF/0024 - Poh Zhen Sdn Bhd - Rimbunan Sawit, - RH Plantation (Selangor Estate), RHPOM - Woodijaya Sdn 	Direct purchases and indirect via third party traders	<p>SDO Bintulu (Direct) - no direct purchase from RH after 1Q 2019</p> <p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>Gilford Ltd, Rimbunan Hijau's operation in Papua New Guinea is not specifically in our supply chain. However, other affiliated mills from Rimbunan Hijau'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 Rimbunan Hijau initiated in September 2018. - Gilford Ltd, Rimbunan Hijau'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. <p>Investigating cases in Sarawak, Malaysia that were highlighted by Mighty Earth in their Rapid Response Reports.</p>	<p>Greenpeace - Final Countdown Report (September 2018)</p> <p>Mighty Earth - Rapid Response Report 12 (January 2019)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p> <p>Mighty Earth - Rapid Response Report 18 (Aug 2019)</p> <p>Mighty Earth - Rapid Response Report 19 (Sep 2019)</p> <p>Mighty Earth - Rapid Response Report 21 (Nov 2019)</p>	Resolved



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		Bhd -Timrest Sdn Bhd			<p>February 3, 2020 - Third-party trader's investigation and engagement with Rimbunan Hijau reveals the following updates:</p> <ul style="list-style-type: none">• Erajaya Synergy Sdn Bhd - Land clearing was reported in several areas based on the RRR 18. While a small portion was cleared for non-palm planting related operation, most of the area was illegally cleared by local communities.• Jaya Tiasa Holdings Berhad - The land clearing is not related to oil palm development.• Poh Zhen Sdn Bhd - the reported land clearing is not related to oil palm development.• Simunjan Estate - Land clearing was not done by the company, it was illegal encroachment by surrounding communities.• RH Plantation (Selangor Estate) - The land clearing is not related to oil palm development.• Woodijaya Sdn Bhd - The area in question is an NCR land, where the 4ha clearance was done by communities for the planting of pineapple.• Timrest Sdn Bhd - Land clearing was not conducted by the company, it happened outside their concession boundary.		



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49	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 Bintuni Agro Prima Perkasa (PT BAPP) - PT Cahaya Agro Pratama (PT CAP) - PT Duta Rendra Mulya (PT DRM) - PT Menara Wasior - PT Rimbun Sawit Papua - PT Salim Ivomas Pratama Tbk (SIMP) - PT Subur Karunia Raya - PT Agro Subur Permai (PT ASP) 	Indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>The Salim Group were historically in the supply chain of our Sime Darby Hudson & Knight 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 Sime Darby Unimills 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>	<p>Mighty Earth - Rapid Response Report 1 (November 2017)</p> <p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Rainforest Action Network - Salim Report (April 2018)</p> <p>Mighty Earth - Rapid Response Report 6 (July 2018)</p> <p>Mighty Earth - Rapid Response Report 9 (October 2018)</p> <p>Mighty Earth - Rapid Response Report #20 (October 2019)</p>	No Longer in Supply Chain



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50	Samling / Glenealy Plantations	<p>Reports of deforestation in Myanmar Stark Prestige Plantation (MSPP), operations in Sarawak, Malaysia and in North Kalimantan, Indonesia.</p> <p>- Tunas Borneo Plantations - Syarikat Samling Timber Sdn Bhd - Samling Lana LPF 0006 - Samling Jelalong LPF 0007 - LPF 008 Marudi & Batu Belah</p>	Direct purchases and indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p> <p>SD Oils Bintulu</p>	<p>Myanmar Stark Prestige Plantation specifically is not in our supply chain, however other mills affiliated with Samling / Glenealy Plantations are.</p> <p>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. - Dec 2017 MSPP commissioned Montrose Environmental which is also a registered assessor to carry out a HCV study and they are licensed to do so in Myanmar. - HCV report's recommendation was adhered to by MSPP until the asset was disposed-off towards the end 2018/early 2019 by the Group (February 2020). <p>Updates on deforestation in Kalimantan:</p> <ul style="list-style-type: none"> - Reports of deforestation in Kalimantan, Indonesia by PT Tunas Borneo Plantation, is not associated with the Samling Group. The area highlighted is outside of the Samling Groups concession. 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 (February 3, 2020). <p>Updates on deforestation in Sarawak:</p> <ul style="list-style-type: none"> - Syarikat Samling Timber Sdn Bhd (LPF 0014) as highlighted by Mighty Earth's rapid response report 17 is for Industrial Tree Planting and that they have no oil palm estate in the stated location. - Samling Lana LPF 0006 and LPF 008 Marudi & Batu Belah as highlighted in Mighty Earth's rapid response reports 11, 13, 15, 16, and 17 were not related to oil palm plantations. 	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Environmental Investigation Agency - Papua Oil Palm Risk Exposure Summary (May 2018)</p> <p>Greenpeace - Final Countdown Report (September 2018)</p> <p>Mighty Earth - Rapid Response Report 11 (December 2018)</p> <p>Mighty Earth - Rapid Response Report 13 (March 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p> <p>Mighty Earth - Rapid Response Report 16 (June 2019)</p> <p>Mighty Earth - Rapid Response Report 17 (June 2019)</p> <p>Mighty Earth - Rapid Response Report 18 (Aug 2019)</p> <p>Mighty Earth - Rapid Response Report 24 (Jan 2020)</p>	Ongoing Monitoring & Engagement



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					<p>Clearing detected were related to the harvesting of tree plantation species (February 3, 2020).</p> <p>- On reports of deforestation in Jelalong LPF 0007 concession, below are the findings:</p> <ul style="list-style-type: none">• Samling Jelalong LPF 0007 Part 1 - Encroachment by communities and made police report made.• Samling Jelalong LPF 0007 Part 2 - photo evidences show the same area was again encroached by communities around Long Tisam. This was investigated and police report lodged.• Samling Jelalong LPF 0007 Part 3 - The deforested area is outside of Samling's concession (February 6, 2020). <p>• On the land clearing highlighted in Mighty Earth Report 24, direct engagement with Samling Group clarified that Marudi LPF is a reforestation area and no oil palm has been planted or will be planted within the LPF.</p> <ul style="list-style-type: none">• Marudi LPF is certified under the Malaysian Timber Certification Scheme.• Within the area identified in ME Report 24, there are areas planted with rubber which is a project sponsored by the Government under RISDA for Long Panai local community. Other areas are for Reforestation under our Group's Licensed Planted Forest (LPF) area.• Glenealy Plantations are amenable to having an NDPE policy of which they are working with a consultant on this.• Glenealy Plantations have agreed to disclose their oil palm boundary maps provided an NDA from SD Oils is in place (February 2020).		



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51	Shin Yang Group / Sarawak Oil Palm	<p>Reports of deforestation in operations in Sarawak, Malaysia and the following operations:</p> <ul style="list-style-type: none"> - Dataran Linau Sdn Bhd - Shin Yang OP Planting Area (LPF/0018) - Dataran Seping Sdn Bhd (Adam Oil Palm Estate) 	Indirect via third party traders	SD Oils Zwijndrecht	<p>The highlighted mills are not specifically in our supply chain, however other mills affiliated with Shin Yang Group/SOP are. Third party traders have relevant NDPE policies and commitments. Current updates from their engagement with Sarawak Oil Palm (SOP) include:</p> <ul style="list-style-type: none"> - Acknowledgement that SOP had non-compliances in their operations between 2016 - 2017. - 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. - With reference to the Rapid Response Report #13 that highlights 10ha of peat clearance in Belaga, Sarawak, our third party trader is reviewing planning studies that indicate that the area is on mineral soil and not peat. - SOP has initiated engagement with their supplier on Rapid Response Report 17 that highlighted preparatory stacking activity. - On the SOP/Shin Yang cases, SOP has confirmed the following with evidence presented: <ul style="list-style-type: none"> - Clearing in Linau Sinar (Rapid Response Report #13) took place outside its palm plantation area. - Clearing in Dataran Seping (Rapid Response Report #20) were done by local communities intending to plant paddy. The management has met the community to prevent further encroachment into the concession area. 	<p>Mighty Earth - Rapid Response Report 4 (May 2018)</p> <p>Mighty Earth - Rapid Response Report 13 (March 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p> <p>Mighty Earth - Rapid Response Report 17 (July 2019)</p> <p>Mighty Earth - Rapid Response Report 18 (Aug 2019)</p>	Resolved



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52	Sime Darby Plantation Bhd	Alleged occurrence of deforestation within Sime Darby Plantation's (SDP) boundary at Sime Darby Plantation Bhd (Derawan, SOU 33) in Bintulu, Sarawak			<p>Pursuant to the report, our desktop verification on the coordinates (3.353, 113.39) showed that it falls outside of SDP's operational area; approximately 100 meters away from our Rajawali Estate boundary. This was followed by an on- site verification which further confirmed that the deforested area mentioned in the report directed to a neighbouring third party local agricultural company.</p> <p>Full press statement response as follow http://www.simedarbyplantation.com/media/press-releases/statement-response-rapid-response-palm-oil-report-19-mighty-earth</p> <p>23 December 2019: The RSPO has now published the boundaries of Sime Darby's concessions in Sarawak, which includes Derawan SOU 33 area. Following further engagement with Mighty Earth regarding the issue of the concession boundary, this matter has been resolved to Mighty Earth's satisfaction.</p>	Mighty Earth - Rapid Response Report #19 (September 2019)	Resolved
53	Sime Darby Plantation Bhd	Complaints of social issues levelled against PT Mitra Austral Sejahtera II (PT MAS II) by Project Affected Community(PAC)			<p>On-going complaint is captured in RSPO Complaints Panel. Updates can be found in this link https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/</p>		Ongoing Monitoring & Engagement



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54	Sin Tek Huat (STH Group)	Report of deforestation in: - PT Makmur Bersama Asia (PT MBA)	Indirect via third party traders	SD Oils South Africa	<p>PT MBA is not specifically in our supply chain, however other mills affiliated with STH Group are. Supplies from STH Group are via third party traders who have NDPE policies and commitments. Engaging with third party trader on this case.</p> <p>Results of third-party trader's engagement with STH Group concluded that the reported deforestation is outside PT Makmur Bersama Asia concession boundary (February 3, 2020).</p>	Mighty Rapid Rapid Response Report #20 (Oct 2019)	Resolved
55	Ta Ann	Reports of deforestation in: - Ladang Selezu Sdn Bhd	Indirect via third party traders	<p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>Ladang Selezu is not specifically in our supply chain, however other Ta Ann mills are.</p> <p>Third party suppliers have relevant NDPE policies and programmes. Updates on their engagement with Ta Ann include:</p> <ul style="list-style-type: none"> - commitment to adhere to NDPE policy obtained and concession maps shared for investigation. - Moratorium on clearing achieved. - Field verification scheduled for July 2019. <p>As part of the investigation, third-party trader's 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 (February 3, 2020).</p>	Mighty Earth - Rapid Response Report 15 (May 2019)	Resolved



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56	TH Plantations	<p>Reports of deforestation and peat clearing in:</p> <ul style="list-style-type: none"> - PT Persada Kencana Prima (PT PKP) - Hydroflow Sdn Bhd - Ladang Tabung Haji - TH Pelita Meludam Sdn Bhd 	Direct purchases and indirect via third party traders	<p>SD Oils Bintulu</p> <p>SD Oils Pasir Gudang</p> <p>SD Oils Zwijndrecht</p> <p>SD Oils South Africa</p>	<p>The highlighted operations are 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 were put on hold until this issue was clarified with stakeholders. This includes a field investigation by third party suppliers. - on 12 September 2018 PT PKP agreed to hire an independent assessor to conduct assessment of the area of contention, together with third party supplier's team. The field assessment included mapping of the target area. A proposed rehabilitation plan will be established if new land was cleared. The field assessment was carried out between 15 – 19 October 2018. Report is being developed. - monthly monitoring indicates that PT PKP continues to uphold their commitment to a moratorium. - Mighty Earth Rapid Response Reports 14 and 15 allege deforestation and peat clearing in two TH Plantation operations in Sarawak, Malaysia. Upon engagement, it was determined that the clearing detected occurred outside of Hydroflow's concession boundary. - Mighty Earth Rapid Response Report 18 alleges peat 	<p>Greenpeace - Deforestation Case Studies (December 2017)</p> <p>Chain Reaction Research Report (July 2018)</p> <p>Mighty Earth - Rapid Response Report 14 (April 2019)</p> <p>Mighty Earth - Rapid Response Report 15 (May 2019)</p> <p>Mighty Earth - Rapid Response Report 18 (Aug 2019)</p>	Ongoing Monitoring & Engagement



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					<p>clearing by TH Pelita Meludam in Sarawak. Initial engagements indicate that the clearing occurred outside of their operations.</p> <ul style="list-style-type: none"> - TH Plantation who confirmed that land clearing at PT PKP had stopped since June 2019. - Ladang Tabung Haji is not specifically in our supply chain but a few affiliated mills are. The GPS coordinates for Ladang Tabung Haji pointed to a Ladang Sebauh an estate under the stable of Ladang Sawit Bintulu Sdn. Bhd., a joint venture company between TH Plantation and a local based company. TH Plantations confirmed that Ladang Sebauh has been disposed off to a third party in 2008 and therefore no longer part of TH Plantations (January 2020). 		
57	Tradewinds	Potential deforestation detected by Trans Kenyalang Sdn Bhd, in Sarawak, Malaysia.	Indirect via third party traders	SD Oils Pasir Gudang SD Oils Zwijndrecht SD Oils South Africa	Third party traders have relevant NDPE commitments and programmes. Maps of the concession has been shared with third party traders for investigation. Identified clearing was found to be outside of the Tradewinds concession.	Mighty Earth - Rapid Response Report 18 (Aug 2019)	Resolved
58	Triputra Agro Persada Group	Reports of deforestation in PT Dwiwira Lestari Jaya.	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 Dwiwira Lestari Jaya in 2014 and 2016, show that the 56ha area highlighted in the Mighty Earth Rapid Response Report #12, was not located within their concession.	Mighty Earth - Rapid Response Report 12 (January 2019)	Resolved



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59	TSH Resources Bhd	Reports of deforestation in PT Bulungan Citra Agro Persada.	Indirect via third party traders	SD Oils South Africa	<p>PT Bulungan Citra Agro Persada is not specifically in our supply chain, however other mills affiliated to its parent company are. Supplies from TSH Resources Bhd are predominantly via a third party trader who have NDPE policies and commitments.</p> <p>We have started engagements to investigate the allegations.</p> <p>TSH has commissioned Malaysian Environmental Consultants (MEC) to verify the allegation. Where it was concluded that the land use change was caused by fire spread into the concession from neighbouring area. As a RSPO member, TSH strictly adhered to no burn policy, and do not use fire for their land clearing activities (February 3, 2020).</p>	Mighty Rapid Response Report 21 (Nov 2019)	Resolved
60	Union Sampoerna Triputra Persada	Reports of deforestation in PT Harapan Hibrida Kalbar	Indirect via third party traders	SD Oils South Africa	Third party traders have relevant NDPE commitments and programmes. Engagements with Union Sampoerna Triputra Persada clarified that the clearing detected was outside of PT Harapan Hibrida Kalbar concession.	Mighty Earth - Rapid Response Report 23 (January 2020)	Resolved
61	Widya Corporation	Reports of deforestation in PT Mulia Inti Perkasa	Indirect via third party traders	SD Oils South Africa	<p>PT Mulia Inti Perkasa is not specifically in our supply chain, however a mill affiliated to its parent company is. The supplies from Widya Corporation are via a third party trader who have NDPE policies and commitments.</p> <p>We have started engagements to investigate the allegations.</p>	Mighty Earth - Rapid Response Report 25 (March 2020)	Investigating



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62	Woodman Group	Reports of deforestation and peat clearing in Sarawak, Malaysia.-- - (Baram estate, part of LPF/0004) - Adong and Liku estates (part of LPF 0004)	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	Third party traders have relevant NDPE commitments and programmes. Engagements with Woodman Group clarified that the clearing detected was in the Baram, Adong and Liku concessions are not related to oil palm development.	Mighty Earth - Rapid Response Report 18 (Aug 2019)	Resolved
63	WTK	Reports of deforestation and peat clearing by Southwind Plantation, in Sarawak, Malaysia.	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	Third party traders have relevant NDPE commitments and programmes. Engagement initiated on clearing detected in Rapid Response Report 17. Updates include: - Third-party trader who engaged with WTK concluded that WTK is not involved in the land clearing. - The land clearing happened either outside their concession boundary or within "Native Dispute Land". - A Police report has been lodged by WTK on the illegal clearing within the "Native Dispute Land" inside their boundary, (February 20, 2020).	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved
64	Yuwang	Reports of deforestation and peat clearing by Empresa Sdn Bhd, in Sarawak, Malaysia.	Indirect via third party traders	SD Oils Zwijndrecht SD Oils South Africa	Third party traders have relevant NDPE commitments and programmes. Engagements with Yuwang clarified that the clearing detected was outside of their concession.	Mighty Earth - Rapid Response Report 17 (July 2019)	Resolved