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# **UKMSA Statement**



**Plantation**

# **Sime Darby Plantation**

## **UKMSA Statement**

### **CONTENTS**

- 01 Our Organisation, Structure And Supply Chain
- 02 Our Commitment, Policies, Procedure And Governance
- 03 Action Plan 2020
- 04 Monitoring, Disclosure And Reporting
- 05 Capacity Building
- 06 Stakeholder Engagement

## UKMSA Statement

This Statement is published in accordance with the Modern Slavery Act 2015 of the United Kingdom (Section 54). The period of reporting for this Statement is for the year ended 31 December 2020. This Statement serves as a progress report following key actions taken subsequent to the Modern Slavery and Human Trafficking Statement FY2019.

## OUR ORGANISATION, STRUCTURE AND SUPPLY CHAIN

### A. About Sime Darby Plantation

Sime Darby Plantation (SDP) is the world's largest oil palm plantation company by planted area, producing approximately 2.496 million tonnes or 4% of global Crude Palm Oil output. We are also the world's largest producer of Certified Sustainable Palm Oil (CSPO), accounting for around 20% of market share of world production by volume. As a globally integrated plantation company, SDP is involved in the full spectrum of the palm oil value chain, from upstream to downstream activities, R&D, renewables and agribusiness. Our Upstream operations, consisting predominantly of oil palm cultivation, harvesting and milling, are located across Malaysia, Indonesia, Papua New Guinea and the Solomon Islands. We operate and manage 240 plantation estates and 69 palm oil mills across those locations.

Our Downstream business (Sime Darby Oils) spans 16 countries worldwide. This includes the United Kingdom as well as Malaysia, Singapore, Indonesia, South Korea, Thailand, Japan, China, Germany, South Africa, the Netherlands, Philippines, UAE, USA, Papua New Guinea and the Solomon Islands. Our downstream business involves the manufacturing as well as the sales and marketing of oils and fats products, oleo-chemicals, palm oil-based biodiesel, nutraceuticals and other derivatives. SDP is also involved in rubber and sugarcane plantations, coconut crushing as well as cattle rearing. Further details of our company can be found on our website - [www.simedarbyplantation.com](http://www.simedarbyplantation.com)

As a business, we are committed to operational excellence, innovation and sustainability. SDP has R&D and Innovation Centres located across the globe with technocrats, scientists and technicians assisting to improve every aspect of our value chain; from developing quality planting materials and environmental-friendly fertilisers to enhancing the systems and processes in cultivating, harvesting and milling, to manufacturing not only high quality but also traceable refined palm oil and palm kernel products.

### B. Our Supply Chain

SDP believes in transparency and traceability in relation to suppliers. With continued growing demand for palm oil, traceability is crucial in helping to halt deforestation and to help producers to understand supply chains, improve reporting and implement effective action plans to improve overall sustainability. SDP's supply chain is complex given the nature of our business. We monitor our traceability performance, and details in relation to traceability and our commitments to supply chain sustainability can be found on our website here.

## OUR COMMITMENT, POLICIES, PROCEDURE AND GOVERNANCE

At SDP, we believe that it is our responsibility to respect and protect the rights of people within our sphere of influence, which includes our employees, contract workers, third party operators, business partners, and communities surrounding our estates. We integrate the responsibility to respect human rights into our culture to foster and support appropriate behaviours, beliefs and values.

### A. Commitment and Governance: Human Rights Task Force and Human Rights Charter

A Human Rights Task Force to strengthen issue identification, management and governance of actions to uphold human rights across the company's operations has been in existence since 2015. Members of this Task Force comprise representatives from departments that are fundamental in upholding human rights; these include Group Sustainability, Group Risk, Group Human Resources, Upstream Plantation, Operations Service, and Group Integrity, Governance and Assurance. The Task Force reports its progress to SDP's Plantation Leadership Committee, and the Sustainability Committee.

One of the key deliverables of the Task Force is SDP's Human Rights Charter (the Charter), which outlines our commitment towards the prevention of modern day slavery and human trafficking. First published in 2017, it was subsequently revised in 2020 to ensure our commitment remains current and relevant. In the Charter, we endeavour to adhere to standards and practices that are aligned with international principles, subject to restrictions of governing laws and regulations of the countries and territories in which we operate. If there is a conflict between local and international norms and/or standards, we aspire to uphold the higher standards wherever possible for our business.

In 2016 and with the support of SHIFT, SDP set up a Human Rights Due Diligence programme informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs) as part of SDP's Business Learning Programme. SDP continues to operate this initiative, under which mills and estates are assessed against the UNGPs (which include the International Labour Organisation's Forced Labour Indicators). The assessment aims to identify salient issues, the nature and degree of any potential impacts of operations and the likelihood of those issues and impacts taking place. Assessments are conducted yearly and focus on key areas and locations that have been identified as salient in our operations. The assessment encompasses areas of potential risk including child and forced labour, ethical recruitment and health and safety, as well as other issues.

Additionally, our palm oil suppliers must adhere to strict no-exploitation commitments through our responsible sourcing guidelines that articulate social standards. Risks that are identified through this process are reported in a Supplier Grievance Register and made publicly available on our website. Our Supplier Grievance Register can be found [here](#) and details the relevant supplier, the issue identified, actions taken and current status.

Given that many human rights issues are bigger than one company, we partner with a multitude of stakeholders to solve complex, systemic issues within the palm oil industry. Pre-competitive collaborations such as the Decent Rural Living Initiative bring likeminded palm oil producers and NGOs together to tackle labour rights challenges.

## B. Policies and Procedures

We have a number of policies and procedures in place which underline our commitment to protecting human rights and which clearly set out our procedures and processes for identifying and addressing any human rights issues within our own business and our supply chains.

These policies and procedures have evolved over time and are regularly reviewed to ensure they have capacity to adapt with this fast-moving environment.

### (i) Code of Business Conduct

The Code of Business Conduct (COBC) articulates our business' core values and acts as guidance to outline the standards of behaviour we expect and require. It underlines SDP's commitment to acting in an ethical manner and to upholding the highest levels of personal and professional behaviour in our interactions and decision-making. The COBC applies to all directors and employees of the Group, and where applicable, Counterparties<sup>1</sup> and Business Partners<sup>2</sup> are also expected to comply with the COBC.

The COBC covers a number of relevant matters, including principles of equal opportunity and non-discrimination, anti-corruption and bribery and dealing with counterparties and business partners. The COBC also outlines clear commitments and principles on upholding and respecting human rights. This includes guidance on ensuring favourable working conditions, protecting the rights of children and vulnerable people and respecting freedom of association.

The COBC also sets our guidance and processes for employees to raise concerns if they think they have identified any violations of the COBC, which would include any human rights violations. The COBC underlines SDP's commitment to concerns being properly dealt with and no toleration of retaliation against individuals who raise concerns in good faith.

### (ii) Policy on the Protection of Human Rights Defenders (HRD)

The Policy on the Protection of Human Rights Defenders (the HRD) applies to all stakeholders affected by SDP's business activities and relationships, including directors, employees, Counterparties, Business Partners, workers in the business and supply chains, and communities surrounding SDP's operations. The policy is informed by the UNGPs as well as other guidance including the International Labour Organisation's Declaration and Fundamental Principles and Rights to Work and the UN's Declaration on Human Rights Defenders.

The policy is aimed at protecting HRDs and ensuring the prevention of harm against HRDs who raise complaints or issues. The policy underlines SDP's commitment to ensuring that the identity of individuals who raise issues is kept confidential in so as far as possible and that HRDs and others who

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<sup>1</sup> Consultants, agents, contractors and goods/service providers of the Group who have direct dealings with the Group.

<sup>2</sup> Any party with which the Group has a commercial relationship with but is not in a position to exercise a significant or controlling influence over, such as customers, Joint Ventures (non-controlling interest) and business alliances

seek to exercise their human rights in the course of their engagement with SDP are protected from violence, threats and all forms of retaliation.

### (iii) Vendor COBC

We work closely with our vendors to ensure that our values and principles are carried through in every aspect of our business operations. The Vendor COBC provides guidance on the standards of behaviour required from all vendors of SDP, and applies to all vendors of SDP when conducting work for the Company, and all vendors' subsidiaries, affiliates and other parties that they have appointed to conduct work for SDP. The Vendor COBC outlines SDP's expectations that all vendors will act with integrity and respect for individuals. It also outlines SDP's business principles around health and safety, respecting human rights, ensuring fair business practices and acting in an ethical manner.

The Vendor COBC contains detailed provisions in relation to labour and human rights and sets out standards and behaviours that vendors are required to demonstrate. These include commitments to equal opportunity and non-discrimination, reasonable wages, benefits and working hours, eradication of exploitation and the abolishment of child labour and the protection of the rights of children. Vendors are expected to understand and comply with the Vendor COBC and to disseminate, educate and verify compliance of their own employees, subsidiaries and affiliates in relation to the Vendor COBC.

### (iv) Group Procurement Policies and Authorities (GPPA)

SDP's Group Procurement Policies and Authorities (the GPPA) outlines SDP's procurement objectives, procurement best practices and SDP's corporate objectives. In particular, the GPPA reflects SDP's objectives, including to enhance transparency and improve vendor management.

The Group Procurement Policies and Authorities require our vendors to undergo a due diligence process and performance evaluation to ensure compliance to their contractual obligations that are related to, amongst others, human rights.

### (v) Vendor Integrity Pledge

The Vendor Integrity Pledge (VIP) is a formal affirmation provided by any vendor who intends to conduct business transactions with SDP. It states that the vendor will comply with all applicable laws or regulations and that they are not, and will not be, involved with any offence of bribery, corruption or fraud. It is a requirement for vendors to sign the VIP upon registration and is required, along with pre-qualification requirements and necessary procedures, for a vendor to be included on SDP's Approved Vendor List. A copy of SDP's VIP can be found [here](#).

## **ACTION PLAN 2020**

In the year under review, the initiatives below were undertaken in line with our commitments and aspirations for continuous improvements. The scope of work in the year 2020 has been focussed largely on our operations in Malaysia due to the large migrant workforce.

## **A. Improving recruitment processes and on-boarding programmes for over 20,000 Migrant Workers**

SDP has endeavoured to ensure that from the beginning of their interaction with SDP, candidates experience a process which is clear and transparent. We have implemented direct recruitment processes in the countries we are hiring actively from, which are Indonesia and India. We halted hiring from Nepal and Bangladesh in 2018 and 2015 respectively, due to recruitment processes being controlled by government to government agreements beyond our control.

We regularly review and evaluate our recruitment practices, processes and on boarding programmes. In October 2020, we engaged a migrant worker specialist to advise on potential improvements which could be made to our recruitment processes. This programme includes the following:

- Improvements in how we select recruitment agencies to ensure improved governance of ethical recruitment procedures.
- Trainings and mentoring with the recruitment agencies to ensure support in the implementation of responsible recruitment procedures.
- Review of our commitment on Zero Cost recruitment, which includes identifying costs that workers claim to have paid where there is no supporting evidence, as well as facilitation and illegitimate costs incurred in the countries of origin.
- Development of a Recruitment Policy that outlines our procedures in ensuring responsible recruitment practice

During this period, we have also undertaken a full review of our recruitment materials to ensure further clarity on our procedures and that grievance channels are communicated prior to workers' departure to Malaysia.

Upon arrival in Malaysia, we endeavour to ensure workers can integrate and adapt to the local way of life as well as Company culture in the best possible manner. Induction programmes are conducted at the respective estates and mills that workers are assigned to. In 2020, we have conducted a review of the induction process to identify any gaps where our migrant workforce may not fully understand the terms and conditions of their contract, wage structures, local laws and culture as well as policies and processes of the Company. Improvements in the content of the training materials have been made to provide further clarity and emphasis - so as to ensure workers are aware of the various grievance mechanisms in place. Voice-overs of power-point presentations and videos are translated into multiple languages as a means to communicate more effectively to workers. The trainings are still being implemented and ongoing due to the number of workers and locations.

## **B. Improving the tabulation of wages in payslips to ensure it is transparent, clear and comprehensible**

SDP is transparent in all its communications with employees regarding remuneration. Contracts of employment state clearly when and how an employee will be paid. However, we understand that because wages are highly dependent on the category of work (daily, monthly or piece rated), job scope, and other variations such as overtime, statutory deductions (such as EPF & SOCSO3), leaves taken, absenteeism as well as other voluntary deductions, confusions may arise.

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<sup>3</sup> EPF – Employee Provident Fund. SOCSO – Social Security Organisation.

We are committed to improve this process through our work with experts in the field. We have been and will continue to be actively involved in various multi-stakeholder platforms and dialogues to advocate for policy change and reformed enforcement in both sending and receiving countries.

## **E. Upholding freedom of movement**

SDP works to ensure that there are no unnecessary impingements on workers' ability to move freely. Additionally, to ensure balance between work and leisure, workers are also able to freely leave the estate and return as they wish. Beyond logging with a guard post their times of departure and return, no specific approval or paperwork is required for an employee to leave the premises for personal reasons.

In 2020 however, Malaysia was impacted by national movement control orders related to the pandemic which restricted not only movement of people within the country but also in and out of the country. This had a major impact on workers who wished to return home to their country as well as workers who wished to return to work in Malaysia. SDP was guided by standard operating procedures enforced by the government and briefed workers on the restrictions on movements. This proved to be challenging as workers were unable to return home to their families. Workers who had completed their contracts and expired their work permits were given special passes to stay as well as free accommodation and continued insurance coverage.

SDP's action in relation to freedom of movement is exhibited positively in two key categories below.

- i. No retention of documents and an informed consent procedure for employees who ask SDP to hold documents securely
  - Workers' passports are not retained or withheld by management.
  - As part of SDP's commitment to continuously improve its processes in relation to migrant workers, in November 2020, SDP rolled out a series of measures to tackle the issue of unrestricted passport access. This includes improved access and management of passports by installing individual passport lockers with respective locker keys only accessible by individual workers across our Upstream Malaysia operations.
  - To date, we have built 211 standalone buildings and installed 27,900 individual lockers.
  - Passport lockers are kept in locker rooms on the estate and mills allowing free access by workers. In addition, our auxiliary police team regularly monitors these areas to ensure passports are secure from the risk of theft.
  - A standard operating procedure for the improved access and management of passports was also developed and has been communicated to all our workers. This includes briefings in multiple languages to ensure they understand and consent to the usage of the lockers provided. Additionally, consent forms translated into respective languages are provided in the event their passports are sent for permit renewals. This includes providing copies of the passport for reference.
- ii. Leaving Employment at SDP
  - When workers wish to end their employment with SDP, we seek in all instances to ensure that there are no unnecessary barriers put in place to prevent this. In the contract of employment, the following terms are included and set out what process will take place if either party terminates a contract of employment:



In June 2019, a new salary slip format was implemented to provide clearer details pertaining to workers' wages. To date, undeniably, among few of the workers, issues remain regarding the content and layout of payslips. We have, therefore, set out a further review to understand how payslips could be made clearer and the steps required to improve the current format. We are considering the outputs of that review and will work to implement any appropriate changes in the course of 2021. We have also developed communication activities to raise awareness on the salary slip to help workers understand the components of their salary and the details in their salary slips including the reasons for any deductions. To complement this, posters have been developed and translated to ensure explanation on contract terms and wages are made clearer. The posters are displayed at the office, muster grounds, housing area and common areas. Should an employee have any specific questions regarding finance issues, they are encouraged to approach their immediate superior, manager or directly approach the corporate administration office based in each estate.

Additionally, to help workers better manage their take home pay, as a next step, we are exploring financial management and financial literacy programmes for workers. Current movement restrictions as a result of the COVID-19 have made face-to-face trainings difficult and we plan to implement this fully in the second half of 2021.

### **C. Mitigating the risk of exploitation of overtime and managing opportunities for overtime effectively**

SDP provides opportunities for overtime work, if there are available tasks on ground subject to approval from the Manager, whilst ensuring no breaches of related regulations. As a responsible employer, SDP has taken several steps to ensure that employees are not subject to excess overtime.

The overtime mechanism in SDP's pay system is fixed and is not flexible. Therefore, it cannot be manipulated. The system limits overtime hours based on the permitted legal limit for workers on plantations during 2020. Overtime pay is calculated based on rates under applicable law.

### **D. Initiatives aimed at ending debt bondage**

As a major player in the palm oil sector, SDP pays for all official statutory costs as stipulated by the governments in Malaysia and in the workers' country of origin from the point of offer by the Company and acceptance by the worker to the point of worker's return. To verify this, we provide workers with pre and post-arrival self-declaration forms. SDP does not charge its workers any recruitment fee for obtaining employment.

Throughout our assessment and engagement with workers, we acknowledge that there may be issues surrounding debt that are beyond our control - attributed mainly to costs imposed by sub-agents or sponsors, as well as personal debts incurred by workers to leave money behind for their families. We are committed to work with the industry players to address these remaining challenges.

As explained above, we engaged a migrant worker specialist in October 2020 to advise on potential improvements which could be made to our recruitment processes including to effect our commitment to zero cost recruitment. We are in the process of identifying costs that may have been paid by workers in country of origin. These costs differ from one worker to another and are most often not validated with receipts or proof payments, making it challenging to realise the zero cost commitment. We have had discussions with recruitment agents in these countries to better understand what costs can potentially be avoided. We recognise that zero recruitment costs will continue to be an issue as the pandemic has left workers more vulnerable than before.

- Workers are free to terminate their employment by providing reasonable notice periods in accordance to national labour laws and respective collective agreements.
- Workers are entitled to eligible benefits from the date of commencement until repatriation.
- All monies due to a worker will be paid before they return to their country of origin.
- SDP will pay for migrant worker's airfare return to their home country, and necessary assistance will be provided to facilitate transport arrangements.

## **F. Improving living conditions**

SDP has taken multiple steps to ensure that living conditions for workers across all estates and mills meet the required standards. Our housing provisions are governed under the Collective Bargaining Agreement and Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446) in Malaysia. In all our other jurisdictions, we are guided by local laws, collective bargaining agreements and international standards.

During the year, we undertook a review of living conditions designed to raise the standards of employee housing and amenities to enhance employee welfare. As a result, we adopted the following:

- The appointment of the 'Person in Charge of Accommodation';
- Identification & Selection of Employees Welfare Representatives (EWR);
- Formation of the Employees Welfare Committee (EWC): this is made up of hospital assistants, regional management and Employee Welfare Representatives;
- Improved procedures in workers housing inspection; and
- A review of the current housing elements of an employee's contract to ensure the rights of a worker and their tenancy obligations are clearly explained.

As a result of this review, we have planned for refitting over 20,000 homes and rebuilding 294 homes over a period of 3 years across our operations.

## **G. Withhold Release Order (WRO)**

On 30 December 2020, the US Customs and Border Protection issued a withhold release order (WRO) on palm oil products produced by SDP (and its group companies) in Malaysia on "reasonable suspicion" of forced labour. To date no evidence has been provided to SDP. Nevertheless, SDP is committed to addressing the WRO during 2021. Further information regarding our ongoing efforts in this regard will be published here <https://www.simedarby.com/press-releases>.

## **MONITORING, DISCLOSURE AND REPORTING**

### **A. Providing trustworthy channels for grievances and regularly studying ways to improve mechanisms**

We have implemented a transparent and robust series of measures which allow workers to raise complaints with confidence. As stated in the Code of Business Conduct (COBC), there is a belief that each employee has the responsibility to respect human rights and to ensure that business is conducted in line with these guiding principles. Any suspected violation of human rights within our operations will be investigated thoroughly.

In 2018, we launched a third-party worker helpline called Workers' Voice to strengthen existing grievance mechanisms. It is a collaborative initiative with Nestle, the Responsible Business Alliance and Elevate. This independent platform, available throughout the day, in multiple languages, is accessible via call, text and Facebook Messenger, is toll-free and enables workers to raise concerns for swift action. The helpline's reporting dashboard enables salient issues to be identified, determining the likelihood of occurrences, and scaling effective remediation. In August 2020 SDP announced the second phase of its roll out of the Workers' Voice helpline. Following the successful completion of a pilot project in February 2019, the plan is to expand the helpline to cover more than 23,000 of SDP's migrant workers, the majority of whom are from Indonesia, India, Bangladesh and Nepal.

We are diligently working to ensure over 30,000 of our workers across 157 operating units (oil palm estates and mills) in Malaysia are aware of the channels of grievances available. As at December 2020, despite the challenges we are facing as a result of pandemic and travel restrictions, we have completed awareness training for 63% of our sites.

For the year 2020, the channel has received 98 calls. The issues we have received can be categorised to include workers wanting to return home, housing issues, clarification on wages and changes to working schedules. Out of the 98 calls, 23 of the calls have been on workers wanting to return home but are unable to due to movement restrictions. The helpline has evidently been an important support line for workers who have been impacted as a result of Covid-19.

SDP also operates a whistleblowing helpline which emphasises that everyone should be empowered to report incidences which go against the ethos of the business. We ensure that all workers who report wrongdoing should not be subject to retaliation and that identities of whistle-blowers are kept confidential. SDP's whistleblowing helpline sits alongside its whistleblowing policy. This emphasises that SDP takes a serious view of any wrong doing and its commitment to all stakeholders being able to raise concerns without fear of retaliation. The policy encourages parties to report wrongdoing, including complaints of sexual harassment, breaches of policies and/or COBC and any other wrong doing. Under the policy, complaints are channelled to an independent function to ensure that there is no conflict of interest and the identity of a whistleblower is kept confidential at all times. Alongside the whistleblowing hotline, there is a whistleblowing e-form and an address for SDP's whistleblowing unit where parties and individuals can raise issues throughout our global operations.

We are currently undertaking a review of existing grievance channels to provide better oversight and identify any areas of the current approach which need to be strengthened. As an additional control, we have created a new "Worker Welfare Representative" role in every estate. This will allow workers a further secure route to communicate any concerns they have to Management. The representative is nominated by workers themselves.

We will continue to retain an active and engaged relationship with trade unions. On average, there are five meetings – either virtually or face to face – between our management teams and trade unions each month. We encourage trade unions to get in touch at any time should they have any specific complaints. Should an employee raise a grievance through their trade union representative, SDP will ensure that they are kept aware of the progress of any investigation and involved as a mediator, if required.

## **B. Zero tolerance for sexual and physical violence**

We endeavour in all instances to eradicate any form of bonded labour, slavery, human trafficking and sexual exploitation. In 2019, we published a revised sexual harassment policy. This applies to all employees and emphasises SDP's commitment to providing a safe, conducive and productive work environment. The policy sets out our robust reporting procedures and the course of action which will be taken by the relevant managers within SDP's Human Resources Department. In the year under review, we set out to improve the role of Gender Representatives in our estates and mills in Malaysia by electing new representatives to ensure that female workers have a specific forum to contribute to how the Company deals with sexual violence issues. The Gender Representatives make up a Gender Committee at regional level. The reporting lines have been improved to ensure governance and have stronger controls in place.

We will continue to provide all necessary support to the best of our ability, including medical support and counselling services, to anyone who has been a victim of sexual and physical violence in the workplace.

Furthermore, in 2019 we collaborated with the Women's Aid Organisation (WAO) to help raise awareness of sexual violence related issues in the workplace. This saw 314 people across SDP's estates and mills in Malaysia which involved managers, assistant managers and executives being trained in how to spot, deal with and stop incidences of sexual harassment, domestic violence and sexual violence.

Moving forward, we will continue our work with the WAO in 2021 to develop an improved Women's Safety Framework. Key components of this programme will look into conducting a gender audit, gender sensitivity training for Managers, skills training for Gender Representatives, as well as improvements in investigation procedures and protocols within the organisation. The main aim of this programme is to create a safe and secure workplace for women in SDP's estates. This programme is expected to commence within the second quarter of 2021.

Starting in 2019, SDP embarked on a Female Manager Development Programme in Malaysia to support the upskilling of women in managerial positions of a typically male dominated industry. Now in its 2nd cohort of enrolment, potential female assistant managers have been identified to undergo leadership as well as technical trainings to ensure they have the capacity and required skills to manage estates and mills. It is envisioned that SDP continue to support women in leadership roles as a means to create greater diversity and inclusivity in its operations.

## **CAPACITY BUILDING**

At SDP, we continuously invest in capacity building and education of all our employees. During the year under review, we have had to revisit how traditional face to face trainings have been conducted in view of social distancing requirements and movement restrictions as a result of the Covid-19 pandemic.

We are currently assessing programmes that can be converted into e-learning courses, and aim to continue to conduct trainings and programmes whilst adhering to the standard operating procedures set by the Government. We will intensify our efforts when the overall movement control orders in the country are lifted.

## STAKEHOLDER ENGAGEMENT

Eradicating exploitation and modern-day slavery is an ongoing journey as the industry addresses risks and impacts across various aspects of operations in an enormous and complex supply chain. We are aware and understand that there are deeply rooted issues that we cannot solve without collaborating with others. We are committed to continue learning from industry experts and international organisations in our pursuit to advocate for improvements in national action plans, policies and industry standards. Since 2019 we have continued to strengthen our engagements and participated in dialogues that are able to steer conversations on the sustainable palm oil practice of respecting human rights.

In the year under review, we focused on establishing dynamic networks to allow for more inclusive sustainable development and solutions from a human rights perspective. SDP has engaged numerous stakeholders from the following groups:

- Rating agencies
- Analysts, fund managers
- Customer
- Key ESG investors
- Partners
- Media
- Public
- Regulators
- Unions
- Governments and elected representatives in Malaysia, source countries and business markets
- Officials in the US and the EU
- Non-governmental and Civil society organisations
- Human rights experts and advocates

The efforts and support exhibited by these groups of stakeholders has set forth a more powerful and robust collaborative approach in addressing human rights issues faced by the palm oil community.

**BOARD APPROVAL**

The Board of Directors of Sime Darby Plantation Berhad and Sime Darby Oils Liverpool Refinery Ltd have endorsed this statement of commitment at their respective board meetings.

**MOHAMAD HELMY OTHMAN BASHA**

Group Managing Director

On behalf of Sime Darby Plantation Berhad

**MOHD HARIS MOHD ARSHAD**

Managing Director, Sime Darby Oils

On behalf of Sime Darby Oils Liverpool Refinery Ltd