

LDC Grievance List - published April 2019

Best efforts have been made to ensure the accuracy of this list. Information is obtained via direct engagements, intermediate trading partners, NGOs or public grievance list updates. This list is being periodically updated. For further information, please contact global-sustainability-palm@ldc.com

Ref No	Group Supplier	Allegation	Source	Direct or Indirect Supply Chain for LDC (or n/a for not in either direct or indirect supply chains in latest traceability report)	Comments
1	Anglo Eastern	Deforestation by PT Kahayan Agro Plantation	Greenpeace report: "Deforestation case studies"	Indirect; exposure to the group via several trading partners	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
2	Austindo Nusantara Jaya	Deforestation by PT Permata Putra Mandiri and PT Putera Manunggal Perkasa, West Papua	Greenpeace report: "Deforestation case studies"	Indirect exposure from 1 trading partner	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners. LDC first engaged ANJ in 2016, and has since been monitoring.
3	BLD Plantation	Forest and peat clearance	Mighty Earth Rapid Response Report	N/a	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
4	Citra Borneo Indah/SSMS	PT SSMS supplying the "Leakage Market" Deforestation by PT Sawit Mandiri Lestari	Chain Reaction report: "Sawit Sumbermas Sarana: Supplying the Palm Oil Leakage Market, Risks for Purchasers"	N/a	Not on LDC's approved purchase list. LDC first engaged CBI in March 2018, and has since been monitoring.
5	Felda	Deforestation by PT Temila Agro Abadi, West Kalimantan	Mighty Earth Rapid Response Report	Indirect; various	LDC does not source from the subsidiary under grievance though does from other subsidiaries in the holding group. LDC has been engaging Felda to monitor progress since February 2018. A stop-work order was issued for the site under grievance. Peat restoration plan has been submitted by Felda for approval by Indonesia's Ministry of Environment and Forestry (April 2018). Enhancements to sustainability policy (April 2018) include HCS, peat management, worker welfare, human rights. Sustainability updates are made public by FGV Holding (latest March 2019).
6	GAMA Group	Deforestation by Graha Agro Nusantara, West Kalimantan; PT Agriprima Cipta Persada, Papua; PT Persada Alam Jaya in Tesso National Park, Riau.	Greenpeace report: "Rogue Trader: Keeping Deforestation in the Family" Eyes of the Forest Report: "Enough is Enough"	N/a	Not on LDC's approved purchase list. LDC has suspended trading with GAMA-related companies, for other commodities too. LDC is monitoring progress and public reporting made by the Group.
7	Korindo	Deforestation by PT Tunas Sawa Erma, Papua	Greenpeace report: "A deadly trade off"	N/a	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
8	Miwon Group	Local community conflict PT Sintang Raya	Mighty Earth Rapid Response Report	Direct	LDC is engaging directly with the supplier. LDC is currently awaiting the implementation plan and will continue to monitor the progress.
9	Palma Serasih Group	Forest clearance by PT Global Primatama Mandiri (GPM)	Mighty Earth Rapid Response Report	Direct	LDC has engaged with Palma Serasih. Supplier (GPM) carried out an HCV assessment in 2016, and an Orangutan survey (both analysis with external NGOs). The area cleared is claimed not to be in HCV area. LDC is awaiting evidence. The supplier is also planning to conduct HCS analysis. LDC to continue monitoring progress and implementation plan.
10	Prosper Group	Deforestation by Bewani Oil Palm Plantation Project (BOPPL), Papua New Guinea	Chain Reaction report: "Shadow Companies Present Palm Oil Investor risks and Undermine NDPE Efforts"	Indirect; exposure via several trading partners	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners. LDC has engaged directly with Prosper Group regarding their policy and potential compensation/remediation despite the shareholder divestment of BOPPL.
11	PT Synergy Oil Nusantara	Procurement from non-NDPE suppliers	Chain Reaction report: "TH Plantations and PT Synergy Oil Nusantara"	N/a	LDC is monitoring updates from intermediate trading partners. Progress is under evaluation.
12	Radiant Lagoon	Deforestation, land conflict - Double Dynasty Palm Oil Mill (DDPOM)	Mighty Earth Rapid Response Report	N/a	Monitoring engagement made by trading partner, who sources from a company with 1 common shareholder. Field visit has been scheduled. LDC to continue monitoring progress from trading partner.
13	REPSA/Grupo HAME	River contamination, human rights abuses, corruption	Various NGO / media reports	Indirect; exposure via 1 trading partner	LDC and TFT are actively engaging REPSA with monthly calls to monitor progress. LDC conducted a field visit in Feb 2019
14	Rimbunan Hijau	Peat clearance Eastern Eden Estate, MLY and Gifford LTD, PNG	Greenpeace Final Countdown; Mighty Rapid Response Report	N/a	LDC is monitoring updates from intermediate trading partners as to the engagement progress. A moratorium is in place during the intermediate trader's engagement process. LDC is communicating non-approval list to trading partner.
15	Salin/IndoAgri	Labour violations PT PP Lonsum Sumatra	Rainforest Alliance Network report: Human Cost of Conflict Palm Oil"	N/a	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
16	Samling/Glenealy Plantations	Deforestation, land grabs, indigenous rights violations, and environmental concerns by Myanmar Stark Prestige Plantation	A coalition of Burmese civil society groups report: "Green Desert"	N/a	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
17	Sarawak Palm Oil Berhad (SOPB)	Deforestation of Linau Sinar Sdn Bhd (Shin Yang Group)	Mighty Earth Rapid Response Report	Indirect; exposure via 1 trading partners	LDC has engaged the supplier several times. SOPB has since launched their NDPE Policy in Feb 2019, and suspended all development of forest unless HCV and HCS studies have been undertaken (1 July 2018). SOPB has its own board of directors and claims to operate independently of Shin Yang. SOPB commented that it treats Shin Yang as any other 3rd party supplier of palm products to SOPB and is subject to its Grievance procedures. LDC to continue monitoring progress and grievance resolution of their FFB suppliers, and to push for further transparency and policy implementation.
18	Sungai Budi/Tunas Baru Lampung	Peat clearance and ongoing government investigations on PT Samora Usaha Jaya	Chain Reaction report: "Tunas Baru Lampung"	Indirect; exposure to the group via 1 trading partners	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
19	Tabung Haji	Peat clearance PT Persada Kencana Prima and Hydroflow	Chain Reaction report: "TH Plantations and PT Synergy Oil Nusantara"	Indirect; various	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners. Alleged mills are not in the LDC supply chain, but other mills in group are present via indirects. LDC is monitoring where active engagement is being made.
20	Triputra Group (TAP)	Forest clearance PT Dwiwira Lestari Jaya	Mighty Earth Rapid Response	Direct; indirect via various trading partners	LDC has engaged with the supplier. TAP has an NDPE policy. HCS and HCV assessment had been conducted in 2014 and 2016 and no clearance in the HCS/HCV areas. Maps have been shared and reviewed by 3rd parties. Grievance is considered closed.
21	Tsani Hutani Abadi Group	Deforestation by PT Kruiing Lestari Jaya, PT Rayatama Jaya and PT Harapan Rimba Jaya	Several Mighty Earth Rapid Response Reports	N/a	Not on LDC's approved purchase list. This is being communicated to relevant direct suppliers.
22	Multiple Suppliers in Tesso Nilo National Park	Forest clearance of PT Tribakti Sarimas, PT Inti Indosawit Subur - Ukui II, PT Makmur Andalan Sawit, PT Cipta Riau Sarana, PT Berlian Inti Mekar - Rengat, PT Sawit Mas Nusantara, PT Peputra Supra Jaya, PT Sugih Riesta Jaya in Tesso Nilo National Park	Eyes of the Forest Report: "Enough is Enough"	Indirect; exposure via multiple trading partners	LDC has been monitoring updates from intermediate trading partners as to the engagement progress. The targeted mill has been enrolled in the partners' Collaboration for Transformation (CFT) or Traceability to Plantation programmes.

Note that LDC has the following criteria when considering grievances:

- Grievances are considered at a Group level, so grievances carried out at one mill/plantation incur an evaluation to the group as a whole
- For suppliers who are removed from an LDC approved supplier list, this applies to both buy and sell physical transactions
- For suppliers removed from an LDC approved supplier applies to all commodities LDC is involved in. There have been several cases where a different LDC product line has ceased trading with a supplier due to the supplier performance in palm.