

Ref No	Group Supplier	Supplier Entity	Exposure via	Source	Status	Comments
<b>Direct Suppliers Grievances</b>						
1	Astra Agro Lestari			Genesis	Monitoring	<ul style="list-style-type: none"> <li>- An analysis by Genesis Bengkulu found that 15 subsidiaries of PT AAL have carried out land clearance of 12,970 ha in state forest areas from 2015 to 2023.</li> <li>- AAL already published clarification regarding this issue on their website (<a href="https://www.astra-agro.co.id/wp-content/uploads/2024/04/Tanggapan-atas-laporan-penelitian-Yayasan-Genesis-dengan-judul-Astra-Agro-Lestari-Merambah-Kawasan-Hutan-Indonesia-tanggal-2-April-2024.-1.pdf">https://www.astra-agro.co.id/wp-content/uploads/2024/04/Tanggapan-atas-laporan-penelitian-Yayasan-Genesis-dengan-judul-Astra-Agro-Lestari-Merambah-Kawasan-Hutan-Indonesia-tanggal-2-April-2024.-1.pdf</a>)</li> <li>- In the meantime, LDC continues its engagement with PT AAL and all other relevant stakeholders in working towards resolution of the case.</li> </ul>
	Astra Agro Lestari	<ul style="list-style-type: none"> <li>- PT Mamuang</li> <li>- PT Lestari Tani Teladan</li> <li>- PT Agro Nusa Abadi</li> </ul>	Direct	<ul style="list-style-type: none"> <li>- WALHI</li> <li>- Profundo Report</li> <li>- FoE</li> </ul>	Not on approved purchase list	<ul style="list-style-type: none"> <li>- In April 2024, Profundo Research and advice published report on their website entitled "Unilever's Climate Bill: € 268 Billion" that mentioned AAL in it.</li> <li>- The report shows alleged land grabbing by the following companies, which are subsidiaries of PT Astra Agro Lestari (AAL):               <ol style="list-style-type: none"> <li>PT Mamuang</li> <li>PT Lestari Tani Telada (LTT)</li> <li>PT Agro Nusa Abadi (ANA)</li> </ol> </li> <li>- The report also mention deforestation issue</li> <li>- In May 2024, AAL already published response to Profundo report on their website (<a href="https://www.astra-agro.co.id/wp-content/uploads/2024/05/Response-to-the-Profundo-Research-Report-Entitled-Unilevers-Climate-Bill-268-Billion-Published-on-the-Profundo-Website-on-April-29th-2024.pdf">https://www.astra-agro.co.id/wp-content/uploads/2024/05/Response-to-the-Profundo-Research-Report-Entitled-Unilevers-Climate-Bill-268-Billion-Published-on-the-Profundo-Website-on-April-29th-2024.pdf</a>)</li> <li>- LDC has engaged separately with the grievance raiser and AAL.</li> <li>- AAL collaborated with a third party to verify the issue and published the report (<a href="https://www.astra-agro.co.id/wp-content/uploads/2024/09/ASTRA-AGRO-FIRST-PROGRESS-REPORT-ON-ACTION-PLAN-IMPLEMENTATION.pdf">https://www.astra-agro.co.id/wp-content/uploads/2024/09/ASTRA-AGRO-FIRST-PROGRESS-REPORT-ON-ACTION-PLAN-IMPLEMENTATION.pdf</a>). They also published an action plan based on the third party's verification results (<a href="https://www.astra-agro.co.id/wp-content/uploads/2023/11/2023-10-30-ENS-Final-Report-AAL-Cases-in-C-Sulawesi-ENG.pdf">https://www.astra-agro.co.id/wp-content/uploads/2023/11/2023-10-30-ENS-Final-Report-AAL-Cases-in-C-Sulawesi-ENG.pdf</a>)</li> <li>- AAL is open to engaging in direct and transparent dialogue if there are suggestions regarding the action plan. They warmly welcome any concerns from the grievance raiser and is eager to discuss these matters directly.</li> <li>- Currently these Astra subsidiaries are not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.</li> </ul>
2	Austindo Nusantara Jaya	<ul style="list-style-type: none"> <li>- PT Permata Putra Mandiri</li> <li>- PT Putera Manunggal Perkasa</li> </ul>	Direct	Greenpeace report: "Deforestation case studies"	Closed	LDC first engaged ANJ in 2016, and have been putting moratorium of land clearing since 2016. They have updated their Sustainability Policy in 2019. ANJ have started their recovery plan in their West Papua concession in 2020. ANJ has published "The ANJ Group Recovery Site 3rd Progress Report" ( <a href="https://anj-group.com/en/hcs-area-loss-recovery-plan/download/1406/[TO%20BE%20PUBLISHED%20191222]%20The%20ANJ%20Group%20HCS%20Recovery%20Site%203rd%20Progress%20Report-compressed_19T5el20221221120154.pdf">https://anj-group.com/en/hcs-area-loss-recovery-plan/download/1406/[TO%20BE%20PUBLISHED%20191222]%20The%20ANJ%20Group%20HCS%20Recovery%20Site%203rd%20Progress%20Report-compressed_19T5el20221221120154.pdf</a> ) in their website on 21st Nov 2022. This case is considered closed.
3	BBIP Palm Group	PT Artha Prigel (PT AP)	Direct	Business and Human Rights Resource Centre	Closed	LDC does not source from the mill under grievance but has sourced from the Group. The grievance concerns local community claims of 180ha land rights in PT AP legal permit area (which has been in operation since 1983). On 21st March 2020, around 70 communities members tried evicting PT AP workers and clashed with authorities. Casualties were incurred on both sides, with the death of two community members. PT AP has lodged a police report on the matter, and their security officer has been detained as part of the investigation. This incident inflict their security officer sentenced to prison. This case is considered closed.
4	Dharma Satya Nusantara (DSN)	<ul style="list-style-type: none"> <li>- PT Prima Sawit Andalan (PT PSA)</li> <li>- PT Putra Utama Lestari (PT PUL)</li> <li>- PT Kencana Alam Permai (PT KAP)</li> </ul>	Direct	Mighty Earth Rapid Response Report	Closed	<p>In July 2019, the following information was obtained: PT PSA stopped clearing the area in 2015 and no clearing carried out since. DSN provided evidence, confirming that the alleged land clearing was carried out by local communities in the area, and not by the company. The issue has been reported to the local police, the community leader and the head of village. This case is considered closed.</p> <p>As for PT PUL, DSN has carried out on-the-ground checking. The deforestation took place outside the concession area: local communities had cleared the area for rice paddy fields. This case is considered closed.</p> <p>As for PT KAP, supplier responded that the alleged land clearing was carried out by local communities. This case is considered closed.</p>
5	Genting Plantation	<ul style="list-style-type: none"> <li>- PT Citra Sawit Cemerlang (PT CSC)</li> <li>- PT Permata Sawit Mandiri (PT PSM)</li> </ul>	Direct	Mighty Earth Rapid Response Report	Closed	<p>In May 2019, LDC received the following information: Supplier started an HCS Study in PT CSC with Aid Environment in Nov 2016. The field work stopped in May 2019. The alleged deforestation is not in the HCS area. Supplier has ceased clearing since May 2019. The final HCS assessment has been submitted to HCSA Secretariat at the end of May 2019, and has been approved by 25th Feb 2020.</p> <p>See <a href="https://highcarbonstock.org/forest-conservation-monitoring/assessment-reports/">https://highcarbonstock.org/forest-conservation-monitoring/assessment-reports/</a> This case is considered closed</p> <p>The supplier claimed that PT PSM has not been part of Genting Plantation since 2017.</p>
6	Goodhope	PT Rim Capital (PT RC)	Direct	Mighty Earth Rapid Response Report	Closed	In Dec 2019, LDC received the following clarification: the alleged land clearing occurred as a result of landfires on community-owned areas on 20th September 2019. The company has made and submitted a report to local authorities on the land fires that occurred in the vicinity of PT RC. It clearly stated that the fires were not committed by the company. All fire incidents originated from burnt land or forests belong to local community that are located close to the area of PT RC. The local authority acknowledged the report and recognized the company's efforts to take immediate measures to extinguish and contain the fires. This case is considered closed.
7	Kencana Agri	<ul style="list-style-type: none"> <li>- PT Agro Sawit Mas Lestari (PT ASML)</li> <li>- PT Agri East Borneo Kencana (PT AEBK)</li> </ul>	Direct	Mighty Earth Rapid Response Report	Closed	<p>Supplier provided evidence in July 30th 2019 that the alleged land clearing on PT ASML is located outside their concession area. This case is considered closed.</p> <p>PT AEBK has stopped planting for their nucleus estate since 2011. The grievance on PT AEBK was done by local communities in their plasma allocated land. Supplier has issued a stop work order on any land preparation in their concession since Dec 2020. A HCS/HCV assessment will be scheduled once the Covid19 situation is improved. This case is considered closed.</p>
8	KPN Plantation (GAMA Group)	<ul style="list-style-type: none"> <li>- PT Graha Agro Nusantara (PT GAN)</li> <li>- PT Agriprima Cipta Persada (PT ACP)</li> <li>- PT Persada Alam Jaya (PT PAJ)</li> <li>- PT Sumatera Unggul Makmur (PT SUM)</li> <li>- PT Agrinusa Persada Mulia (APM)</li> </ul>	Direct	<p>Greenpeace report: "Rogue Trader: Keeping Deforestation in the Family"</p> <p>Eyes of the Forest Report: "Enough is Enough"</p> <p>Mighty Earth Rapid Response Report</p>	Closed	KPN has published the grievance on PT APM ( <a href="http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf</a> ). Local district open the area inside APM concession for 4 transmigration settlement & villages. KPN has published "Towards NDPE Policy Compliance" 3rd Progress Report (November 2019 - December 2020) in their website on 15th Mar 2021. This case is considered closed.

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9	Kuala Lumpur Kepong Berhad	- PT Menteng Jaya Sawit Perdana (PT MJSP) - PT Jabontara Eka Karsa (PT JEK)	Direct	Mighty Earth Rapid Response Report Forest Report	Closed	Supplier responded that the alleged land clearing is located outside their concession area. The details see <a href="https://www.klk.com.my/sustainability/market-place/grievance/">https://www.klk.com.my/sustainability/market-place/grievance/</a> . This case is considered closed.
10	Lyman Agro	PT Bonti Permai Jayaraya (PT BPJ)	Direct	Mighty Earth Rapid Response Report	Closed	Supplier responded that the alleged land clearing is located outside their concession area. During the period of Jan-Aug 2019, they didn't have any land clearing activity. Supplier provided evidence overlaying with their concession map. This case is considered closed.
11	Miwon Group	PT Sintang Raya (PT SR)	Direct	Mongabay	Closed	Supplier responded that the alleged area was conflicting legal ownership of the land between PT SR and PT Cipta Tumbuh Berkembang (PT CTB). PT SR has location permit/zin Lokasi and right to cultivate/Hak Guna Usaha. PT CTB has izin lokasi which overlapped with PT SR's Hak Guna Usaha (HGU). PT SR and PT CTB agreed to resolved the land conflict with Akta Perjanjian Perdamaian facilitated by Kubu Raya Regent. This case is considered closed.
12	Palma Serasih Group	- PT Global Primatama Mandiri (PT GPM) - PT Nusantara Agro Sentosa (PT NAS)	Direct	Mighty Earth Rapid Response Report	Closed	Supplier has provided evidence that HCV assessment was carried out in 2016 by Aksenta, and also undertaken an Orangutan survey with BOSF. The cleared area was not in HCV area. As part of the LDC engagement, the supplier issued the Stop Work Order on 13th Sep 2020. HCS assessment is done for PT GPM and PT NAS by Aksenta. Palma Serasih Group has published NDPE Policy in their website on 1st Nov 2021. This case is considered closed.
13	Perkebunan Nusantara	PT Perkebunan Nusantara II Prafi	Direct	Mighty Earth Rapid Response Report	Closed	Supplier responded that Prafi is not under PTPN II management control. This case is considered closed.
14	Sampoerna	PT Usaha Agro Indonesia (PT UAI)	Direct	Mighty Earth Rapid Response Report	Closed	Supplier responded that the alleged area was within community areas. This case is considered closed.
15	Saraswanti	PT Saraswanti Agro Estate (PT SAE)	Direct	Foresthints	Not on approved purchase list	LDC has not purchased since Q1 2019. In H1-2020, through string of traders, entering our supply chain in 1 spot purchase. Not on LDC approved purchase list.
16	Triputra Agro Persda Group	- PT Dwiwira Lestari Jaya (PT DLJ) - PT Brahma Bina Bhakti (PT BBB)	Direct	Mighty Earth Rapid Response Report	Closed	TAP has an NDPE policy. HCS and HCV assessment of PT DLJ were conducted in 2014 and 2016 and no clearance in the HCS/HCV areas. Maps have been shared and reviewed by 3rd parties. This case is considered closed.  The alleged deforestation area of PT BBB located outside their HGU. Currently the area belongs to local communities and previously a rubber plantation. This case is considered closed.
<b>Indirect Suppliers Grievances</b>						
1	Anglo Eastern	PT Kahayan Agro Plantation	No longer in the LDC supply chain	Greenpeace report: "Deforestation case studies"	Closed	AEP had collaborated with Earthqualizer (EQ) in calculating AEP's liability for past harm at the group level totaling 2,889 Ha. AEP also confirmed it had agreed with EQ on developing a time-bound recovery plan proposal <a href="https://bit.ly/3kc9jQE">https://bit.ly/3kc9jQE</a> . Given this satisfactory development, our trading partner has considered this grievance closed.
2	Bakrie Plantation	PT Mentholi Mitra Lestari	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Closed	LDC engaged with trading partner. Supplier claims the alleged company is not part of Bakrie Plantations since 2017.
3	BBC Holding Sdn Bhd	Almabumi Plantation Sdn Bhd	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Closed	LDC engaged with trading partner. Supplier claims the alleged company was Almabumi Plantation Sdn Bhd, instead of Alambumi Sdn Bhd. It is similar with our trading partner's supplier, but not connected.
4	BEST Agro International	- PT Wanasawit Subur Lestari - PT Karya Luhur Sejati - PT Menara Tunggal Perkasa	No longer in the LDC supply chain	Chain Reaction Research 2019 Mighty Earth Rapid Response Report	Not on approved purchase list	LDC has been engaging and placed conditions on the supplier regarding their sustainability policies and practices. As part of this engagement, BEST has issued a stop work order (SWO) for their plantation on 6 Mar 2020. The SWO is valid from 6 April 2020 and is available upon request. Current satellite monitoring shows that clearing stopped in April, in compliance with the engagement and the SWO. LDC has requested that a Sustainability Policy is developed along with its implementation plan. LDC has a minimal managed sourcing policy in place, until these additional conditions have been met.  In view of recent severe incidents associated with PT Hamparan Masawit Bangun Persada over community land rights, LDC has suspended BEST Agro International and its subsidiaries given substantiated non-compliance with LDC's NDPE requirements, via below statement:  <a href="https://www.ldc.com/wp-content/uploads/LDC-Statement-BEST-Group-Palm-Community-Rights-Indonesia-November-2023.pdf">https://www.ldc.com/wp-content/uploads/LDC-Statement-BEST-Group-Palm-Community-Rights-Indonesia-November-2023.pdf</a> .
	BEST Agro International	PT Hamparan Masawit Bangun Persada	No longer in the LDC supply chain	Kaoem Telapak Mongabay	Not on approved purchase list	
5	BLD Plantation Bhd	BLD Plantation Bhd	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Monitoring	1. In July 2018, Our trading partner received CPKO supply from BLD Plantations - Kirana Palm Oil Refinery Sdn Bhd, Sarawak through Butterworth bulking installation. 2. Our trading partner has immediately reached out to our direct contractual supplier for supply chain verification. The engagement with our direct supplier is still in progress. 3. Our trading partner decided to temporarily stop sourcing from the supplier until and unless the company shows positive progress to resolve the ambiguity. 4. As of May'19, BLD Plantations announce engagement plan with Earthworm Foundation and publicly announced commitment on a Sustainable Palm Oil Policy with NDPE compliance. 5. Since May 2019, BLD Plantations demonstrates significant progress, where the Company publish their sustainability commitments such as NDPE Policy, Sustainability Implementation Plan (2019 - 2023), Traceability and more at <a href="http://dashboard.blddb.com.my/">http://dashboard.blddb.com.my/</a> . 6. Our trading partner will continue to assess the sustainability progress of the company closely. 7. In May 23, Our trading partner released trade suspension for BLD Plantation. This is in view of significant sustainability progress made by BLD Plantation since year 2019. i. Commitment in recovery project with progress on engaging a local conservation expert, Joanes Unggang, to assess the HCS & biodiversity level of the three sites zoned for conservation. ii. There is no other new deforestation alert brought up against BLD Plantation. iii. BLD Group will develop a time-bound action plan to conserve and protect these three plots of land. iv. Our trading partner commits to continue working closely with BLD Group to progress in its sustainability journey.
6	CB Industrial Product Holding Berhad	PT Kurun Sumber Rezeki	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Closed	Earlier in 2019, LDC had engaged with the trading partner through whom LDC has exposure. Supplier claimed, they have disposed their controlling shares of the company to PT Jhonlin Agro Mandiri in 2016, currently own only 20%.  CBI's suspended by LDC since 2018. Now CBI has already complied to LDC's Re-entry procedure and back to LDC supply chain.
7	Citra Borneo Indah/SSMS	- PT Sawit Sumbermas Sarana - PT Sawit Mandiri Lestari	No longer in the LDC supply chain	Chain Reaction report: "Sawit Sumbermas Sarana: Supplying the Palm Oil Leakage Market, Risks for Purchasers"  Greenpeace report: "Deforestation case studies"	Closed	
8	Delima Makmur	PT Delima Makmur	Musim Mas (H1-2024)	Rainforest Action Network (RAN)	Monitoring	LDC had engaged with trading partner on this grievance. They carried out independent verification on the allegation and engaged with PT Delima Makmur. They are in the midst of working with on a follow up action needed. One of the action is in strengthening of the traceability system.
9	Dhanista Surya Nusantara	PT Sabhantara Rawi Sentosa	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Closed	LDC had engaged with trading partner. They have confirmed and verified that the alleged land clearing is located outside PT SRS concession. [ <a href="https://www.musimmas.com/sustainability/group-supplier-engagement-grievance/grievance-list/dhanistha-surya-nusantara-dsn">https://www.musimmas.com/sustainability/group-supplier-engagement-grievance/grievance-list/dhanistha-surya-nusantara-dsn</a> ]

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10	Double Dynasty Group	- Double Dynasty Palm Oil Mill - Radiant Lagoon Sdn Bhd - Mutiara Pelita Genaan Plantation Sdn Bhd	Wilmar, FGV (H1-2024)	Mighty Earth Rapid Response Report	Closed	LDC had engaged with trading partner. They have lifted the suspension on the DD Group in July 2019 and continue actively guiding DD Group in the development of the recovery plan and monitor DD Group's activities on monthly.
11	FGV Holding Berhad/Felda	- PT Temila Agro Abadi	No longer in the LDC supply chain	Mighty Earth Rapid Response Report  Grant & Eisenhower ESG Petition to US Custom and Border Protection  International Labor Rights Forum (ILRF), Rainforest Action Network (RAN) and SumOfUs Petition to US Custom and Border Protection	Monitoring	<ul style="list-style-type: none"> <li>- LDC has been engaging FGV to monitor progress since February 2018. A stop-work order was issued for the site under grievance. Peat restoration plan has been submitted by FGV for approval by Indonesia's Ministry of Environment and Forestry in April 2018.</li> <li>- In August 2019, RSPO lifted certification suspension for FGV's Serting Complex. FGV issued a public statement responding to ESG Petition on 26th June 2019, and to coalition of NGOs' petition on 19th August 2019. FGV also established multidisciplinary group of NGOs on Human Rights Remediation Efforts, with the support of Procter &amp; Gamble Company in September 2019.</li> <li>- On 13 January 2020, RSPO suspended the Principles and Criteria (P&amp;C) certification processes for all uncertified units of Felda Global Ventures Holdings' (FGV Holdings) and reimposed its suspension on FGV Holding's Kilang Sawit Serting for non-compliance of the Complaints Panel Decision dated 28 November 2018.</li> <li>- Several progress reports related to RSPO Complaint Cases have been published by FGV, on 10 April 2020, 7 July 2020 and 29 July 2020.</li> <li>- On 30 September 2020, the United States Customs and Border Protection (CBP) issued a Withhold Release Order (WRO) of palm oil and palm oil products made by FGV at all U.S ports of entry. FGV has issued a statement in response on 1 October 2020. In addition, Fair Labor Association (FLA) issued a progress report on FGV and RSPO published a statement on the issue too.</li> <li>- In November 2020, FGV adopted its revised Group Sustainability Policy (GSP) in which provisions on labour were strengthened based on the FLA Workplace Code of Conduct.</li> <li>- In February and March 2021, the FLA conducted a second validation exercise to assess FGV's progress in implementing its action plan.</li> <li>- FGV had discussions with their US-based legal counsel and has appointed ELEVATE as the independent auditing firm to conduct an assessment of FGV's operations against the 11 ILO Indicators of Forced Labour.</li> <li>- FGV had remediation plan and targeted to submit the remediation plan verification result by Q4 2023.</li> <li>- FGV is implementing Elevate 's recommendations to reimburse its current and former foreign workers, who were employed after 27 June 2019 and had to pay recruitment fees to agents or other third parties in their countries of origin.</li> <li>- On 10 January 2024, FGV announced (<a href="https://www.fgvholdings.com/press_release/fgv-makes-significant-strides-in-addressing-us-customs-withhold-release-order-rm72-2-mil-reimbursed-to-workers-strengthened-recruitment-procedures-for-no-recruitment-fee/?pagen=1">https://www.fgvholdings.com/press_release/fgv-makes-significant-strides-in-addressing-us-customs-withhold-release-order-rm72-2-mil-reimbursed-to-workers-strengthened-recruitment-procedures-for-no-recruitment-fee/?pagen=1</a>) that total of RM72.2 million has been reimbursed to 19,673 workers. FGV appointed LRQA, formerly known as ELEVATE to conduct a verification of the reimbursement exercise. LRQA is expected to conduct its follow-up assessment in the first quarter of 2024 which is to verify the implementation of FGV's overall remediation plan. With the outcome of the assessment, FGV will then prepare a petition to the CBP to modify the WRO, which will be submitted by the end of the second quarter of 2024.</li> </ul> <p>LDC will continue to monitor the progress on FGV.</p>
12	First Borneo Group	PT Arjuna Utama Sawit	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Not on approved purchase list	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
13	First Resources	Ketapang Agro Lestari	First Resources (H1 - 2024)	Forest People Programme	Closed	First Resources has conducted ground verification and they founded that a small area of 0.55 ha was cleared in an area classified as "Recommended for Conservation". They carried out rehabilitation works in the affected area. The rehabilitation work is now complete and they will continue to monitor it. So the case has already closed.
	First Resources		First Resources (H1 - 2024)	The Gecko Project	Monitoring	<p>LDC engaged with First Resources in November 2023. First Resources provided updates on the ongoing RSPO investigation and their public statement on this case (<a href="https://www.first-resources.com/upload/file/20231124/20231124214656_23773.pdf">https://www.first-resources.com/upload/file/20231124/20231124214656_23773.pdf</a>). LDC will continue to monitor the progress of the RSPO investigation.</p> <p>Meanwhile, FAP Agri and Ciliandry Anky Abadi (CAA) are on our "no-buy" list, given the high-risk result of our internal supplier NDPE due diligence.</p>
14	Global Sawit Semesta	PT Global Sawit Semesta	No longer in the LDC supply chain	Rainforest Action Network (RAN) Report : "Carbon Bomb Scandals – Big Brands Driving Climate Disaster for Palm Oil"	Closed	<p>LDC had engaged with trading partner on this grievance. They carried out investigation on the allegation and engaged with PT Global Sawit Semesta. They confirmed that alleged illegal FFB Mr. Mahmudin is not part of the Global Sawit Semesta supply chain. They will take on further engagement with Mr. Mahmudin to support NDPE compliance.</p> <p>An action plan has been prepared for PT GSS and CV Natama Prima, including further improvements to TTP data and socialization of the latest notification/affirmation of the ban on sending illegal FFB.</p> <p>Considering that PT GSS has stopped purchasing FFB from the reported plantations and is committed to improving the implementation of NDPE commitments, LDC and our trading partner declare this case closed.</p>
15	Industrias Chiquibul	Industrias Chiquibul	Chiquibul (H1 - 2024)	Forum of International NGOs in Guatemala (FONGI)	Monitoring	<p>LDC has engaged with the intermediary trading partner and with the plantation company in question. The allegation is concerning the attempted eviction of 200 families from the plantation owned by Industrias Chiquibul. The arrest of a member of the community is also challenged on human rights grounds. The plantation company provided photographic evidence of plantation (deforestation) of several hectares, and claim that the aforementioned civil community member damaged property. LDC is following the case with our service provider and local NGOs and has done several direct calls with them in order to request evidence and follow up on the grievances. Following suggestions, Chiquibul has started to share a monthly Corporate Social Responsibility Report. LDC will keep close contact with Chiquibul, monitoring its progress in further strengthening its work with local communities and accompanying its RSPO certification.</p> <p>LDC encouraged and supported Chiquibul to conduct a RSPO gap analysis by a team of independent auditors and LDCs regional team. A 5-day field audit took place in July 2023, which led to an improvement work plan with timeline to address identified gaps. Chiquibul has agreed to follow the improvement plan and timeline, and LDC is following their progress on regular basis. An additional field visit took place on October 2023 on which LDC evidenced the advancement and compromise to comply with all expected advancements. A third-party progress verification is scheduled in 2023 and onwards.</p>
16	Korindo	PT Tunas Sawa Erma	No longer in the LDC supply chain	Greenpeace report: "A deadly trade off"	Not on approved purchase list	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
17	Kurnia Tunggal Group	PT Erasakti Wiraforestama	No longer in the LDC supply chain	Global Witness Report	Closed	LDC had engaged with trading partner on this grievance. They have confirmed and clarified that The Department of Manpower and Transmigration Jambi Province, Indonesia has carried out field visit on November 2022 and found no evidence of child labour in the plantation.
18	Kwantas	Kwantas Pelita Plantation (Balingan) Sdn Bhd	Bunge, KLK, Kwantas, Mewah (H1 - 2024)	Mighty Earth Rapid Response Report	Monitoring	LDC is monitoring updates from intermediate trading partners. Trading partner has been engaging the supplier since May 2019.

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19	Mr Chow Chuin Hai / Sultan of Johor	AA Sawit Sdn Bhd	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Not on approved purchase list	Not on LDC's approved purchase list. LDC engaging with trading partner on this grievance. Below are the updates from our trading partner: a. Trading partner issued a letter on 1 March 2022 to AA Sawit Sdn Bhd b. Trading partner is in the process of investigating and verifying the reported deforestation activities by AA Sawit Sdn Bhd through a third party independent assessor c. On 10 May 2022, trading partner issued a letter to AA Sawit Sdn Bhd to suspend the sourcing of ffb from AA Sawit Sdn Bhd and other entities associated with AA Sawit Sdn Bhd with immediate effect. Trading partner plans to further engage with AA Sawit Sdn Bhd to discuss next steps towards ensuring their compliance with NDPE commitments. LDC continue to monitor the progress from trading partner.
20	Mulia Agro Investama	PT Permata Sawit Mandiri	No longer in the LDC supply chain	Environmental Investigation Agency	Not on approved purchase list	LDC had engaged with trading partner on this grievance. They have confirmed and clarified that has suspended PT Permata Sawit Mandiri in August 2022. <a href="https://bumitama-agri.com/news-and-media/general-releases/bumitama-clarifies-on-its-sourcing-policy-commitments/">https://bumitama-agri.com/news-and-media/general-releases/bumitama-clarifies-on-its-sourcing-policy-commitments/</a>
21	Ocho Sur Grupo	Ocho Sur P	No longer in the LDC supply chain	Forest People Programme	Monitoring	We have engaged with the entity through our trading partner. According to the third-party supplier, the alleged cases mentioned in the report are from the previous owner of the mill, Plantaciones de Pucallpa S.A.C. Based on reports [prepared by independent third parties], we were able to identify that, since the change of ownership to Ocho Sur in 2016, there is no land-clearing activity done by the entity. There is was a discussion between the company and the community on improving mutual relationships and livelihoods. In October 2022, the LDC team made a technical visit to the Ocho Sur plantations, the Shipibo community of Santa Clara de Uchunya, and the region, to investigate the situation. We had the opportunity to share and talk directly to the community on which the allegations were based at Santa Clara de Uchunya. No current allegations by the community were identified or raised. LDC team also visited the education, healthcare facilities, and infrastructure that Ocho Sur invested in the neighboring community. LDC will keep close contact with Ocho Sur, monitoring its progress in further strengthening its work with local communities and accompanying its RSPO certification.  On December 2022, certain civil society organizations introduced a specific instance against LDC before the Dutch National Contact Point (NCP) alleging non-compliance to OECD Guidelines for Multinational Enterprises based on LDC's commercial relationship with Ocho Sur. On September 2023, the Dutch NCP has made public its Assessment of the case, by which it was concluded that. The issues raised in the specific instance merit further examination. Based on this, the NCP has offered its good offices for a mediation process between indigenous organizations and international NGOs and LDC. These specific instances are not legal cases and NCPs are not judicial bodies. Nevertheless, LDC has agreed to engage in this voluntary process with the NCP.
22	Perbadanan Kemajuan Pertanian Negeri Pahang (PKPP Plantation)	Ladang Cherating & Sg. Charu (Pahang)	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Monitoring	LDC engaging with Trading Partner on this grievance. Below are the updates from our Trading Partner: a. PKPP has agreed to put a stop to all land clearing activity at Ladang Cherating & Sg Charu concession. b. The PKPP management has set aside two land banks located at Lipis, Pahang (426 ha) and Pekan, Pahang (130 ha) for its recovery plan. c. In Oct 21, PKPP has published a NDPE policy on its website <a href="https://ndpe.pkpp.gov.my/index.html">https://ndpe.pkpp.gov.my/index.html</a> d. Proposed two recovery projects in Merapoh Kuala Lipis with a total area of 202ha to conserve the remaining forest areas and in and in Bebar Pekan with a total of 103 ha of peatland to conserve the remain in its natural state.  LDC continue to monitor the progress from Trading Partner.
23	Prosper Group	Bewani Oil Palm Plantation Project (BOPPL)	No longer in the LDC supply chain	Chain Reaction report: "Shadow Companies Present Palm Oil Investor risks and Undermine NDPE Efforts"	Closed	LDC has engaged directly with Prosper Group regarding their policy and potential compensation/remediation despite the shareholder divestment of BOPPL. Previously working with Earthworm Foundation on setup NDPE Policy and Action Plan, Prosper Group established a partnership with the Global Environment Centre (GEC) for a Recovery Project in North Selangor Peat Swamp Forest (NSPSF) in Selangor State, Malaysia. Prosper is committed to support the long-term conservation of the Bukit Belata (Extension) Forest Reserve (BBEFR) and adjacent portions of the NSPSF.
24	PT Runding Putra Persada	PT Runding Putra Persada	Permata Group, Wilmar (H1 - 2024)	Rainforest Action Network (RAN) Report : "Carbon Bomb Scandals – Big Brands Driving Climate Disaster for Palm Oil"	Closed	On 19 September 2022, RAN released a report titled "Carbon Bomb Scandals – Big Brands Driving Climate Disaster for Palm Oil" indicating that an illegal palm oil plantation controlled by Mr. Mahmudin was found to be located inside the boundary of Rawa Singkil Wildlife Reserve (RSWR).  Through a collection point facility owned by Mr. Mahmudin, the oil palm fruits were sold to CV Buana Indah (broker) then to RPP. Permata Group has engaged with RPP to help seek clarification in regard to the grievance while monitoring for RPP's action plan. The action plan consists of : - engaging with Mr. Mahmudin to release the overlapped land with the RSWR to the government. - a written commitment from RPP, prohibiting the sourcing of FFB from protected areas, including Leuser Ecosystem and Rawa Singkil Wildlife Reserve. - Ensure FFB sources is 100% Traceable to Plantation.  On July 13, 2023, RPP suspended Mr. Mahmuddin from its supply chain as a result of his rejection of the action plan. Prior to that, CV Buana Indah has also excluded Mr. Mahmuddin from its supply chain, effective immediately on 23 June 2023. Considering that RPP has completed the agreed action plan, our trading partner declare this case closed.
25	QL Resources Bhd	PT Pipit Mutiara Indah	Wilmar (H1 - 2024)	Mighty Earth Rapid Response Report	Closed	LDC have engaged with intermediate trading partner regarding the grievance. Our trading partner has engaged with the alleged supplier and found that the supplier has breached the NDPE Policy. In April 2020, QL Group has met all the criteria stipulated in the re-entry criteria of our trading partner, including their commitment to the Development of Recovery Plan for Non-Compliant Land Clearing to NDPE policy at group level incurred from January 2016 onwards. Based on detailed review of documentation, reports and letter of commitment from QL Group, our trading partner have given due consideration of this progress and have lifted the suspension on QL Group in April 2020.
26	REPSA/Grupo HAME	REPSA/Grupo HAME	No longer in the LDC supply chain	Various NGO / media reports	Closed	LDC and Earthworm Foundation were actively engaging REPSA with monthly calls to monitor progress. LDC conducted a field visit in Feb 2019. REPSA issue regular public sustainability report updates and have recently been audited by Oxfam / Earthworm on the grievance process and procedures. REPSA have several workstreams in place to address previous governance, environmental and social issues.
27	Rimbunan Hijau Group	- Gilford LTD, PNG Eastern Eden Estate, MLY - LPF/0024 (Jaya Tiasa Holdings Bhd)	Bunge, Wilmar (H1 - 2024)	Greenpeace report: "Final Countdown"; Mighty Rapid Response Report	Closed	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.  Our trading partner was held a meeting on 7 September 2018 to further discuss the issues. On 20 September 2018, Gilford Ltd has subsequently provided a written commitment in adhering to the NDPE policy and committed to moratorium of land clearing prior to all necessary assessments, including the HCV and HCS assessment. Gilford has also shared their group wide concession maps to our trading partner for ongoing monitoring.
28	Salim/IndoAgri	- PT PP Lonsum Sumatra - PT Agro Subur Permai	No longer in the LDC supply chain	Rainforest Alliance Network report: Human Cost of Conflict Palm Oil" Mighty Rapid Response Report	Not on approved purchase list	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
29	Samling/Glenealy Plantations	Myanmar Stark Prestige Plantation	No longer in the LDC supply chain	A coalition of Burmese civil society groups report: "Green Desert"	Not on approved purchase list	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
30	Sawit Sukses Sejati	PT Sawit Sukses Sejati	No longer in the LDC supply chain	Environmental Investigation Agency	Closed	LDC had engaged with trading partner on this grievance. They have confirmed that has stopped receiving FFB from PT SSS since January 2022.

Ref No	Group Supplier	Supplier Entity	Exposure via	Source	Status	Comments
31	Shin Yang Group	- Linau Sinar Sdn Bhd; - LPF/0018; - Dataran Linau Sdn Bhd; - Dataran Seping Sdn Bhd. - Linau Sinar Estate - Kenaban Estate	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Closed	LDC has engaged and persuaded our trading partner to launch their NDPE Policy. This was launched in Feb 2019, and they suspended all development of forest since 1 July 2018, unless HCV-HCS undertaken. They have its own board of directors and claims to operate independently of Shin Yang. On 9th July 2019, They visited Linau Sinar Sdn Bhd to insist on moratorium on new clearing and verification audit for the alleged clearing. A follow up session will be scheduled in 3 months time. For LPF/0018, the alleged clearance had taken place at License for Planted Forest (LPF) area which was outside their oil palm plantation area. For Dataran Linau, the alleged clearance has happened outside their concession. The concession map has been shared with our trading and we are awaiting a copy.  For Dataran Seping, reported company had confirmed that the alleged clearance had taken place inside its concession area. However, based on ground verification, the clearance reported was found to be due to encroachment by some local communities for the purpose of paddy planting. As the clearance activity is considered as encroachment, the reported company had met the local communities on 10/11/2019 to highlight the issue in order to prevent future encroachment inside its concession area. For Linau Sinar Estate and Kenaban Estate, Shin Yang Oil Palms Division had fully stopped land clearing since December 2020 for oil palm planting. The deforestation alerts detected are attributed to logging activities which were conducted by Shin Yang's Tree Planting Operation Management with legal approved permits.
32	Sime Darby Plantation	Sime Darby Plantation	Bunge, Mewah, FGV, ISF, Sime Darby, Wilmar, Innovans (H1 - 2024)	Liberty Shared Petition to US Custom and Border Protection	Closed	On 20th April 2020, Liberty Shared issued a petition to US Custom and Border Protection to exclude product from Sime Darby Plantation. Sime Darby has responded to the allegation in 3 occasions, where the latest mentioned about an independent review of the governance, procedures and practices related to the areas of concern. In Dec 2020, US Custom issued WRO (Withhold Release Order) on Sime Darby. SDP appointed PricewaterhouseCoopers Consulting Associates on 19 October 2020 to establish effective platforms and channels of communication to address any concerns or issues surrounding their operations in Malaysia.  They have also appointed an international NGO specialising in migrant worker rights on 1 October 2020 to assist SDP in the following: <ul style="list-style-type: none"> <li>• assessing current recruitment processes, especially in the migrant worker source countries, and identifying areas for improvement;</li> <li>• developing better recruitment processes that can be deployed once they are able to resume recruitment; and</li> <li>• proposing other corrective measures that can be implemented by SDP to further strengthen recruitment procedures to enhance the migrant workers' right.</li> </ul> Sime Darby has appointed IMPACTT as the independent auditing firm to conduct an independent evaluation of labour practices in their Upstream Malaysia operations against the 11 International Labour Organization (ILO) Indicators of Forced Labour and also with Andy Hall, a human rights activist, to review and improve their foreign worker recruitment processes.  Sime Darby issued a public statement responding to US CBP's decision on modifying its forced labor finding against Sime Darby in their website. The details see <a href="https://sime-darbyplantation.com/sime-darby-plantations-palm-oil-exports-to-united-states-given-greenlight-after-review-by-us-customs/">https://sime-darbyplantation.com/sime-darby-plantations-palm-oil-exports-to-united-states-given-greenlight-after-review-by-us-customs/</a> .
33	STH Group	PT Makmur Bersama Asia	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Closed	LDC engaged with trading partner. Our trading partner has verified the evidence and confirm that the alleged development is not within the concession area of the supplier.
34	Sungai Budi/Tunas Baru Lampung	PT Samora Usaha Jaya	No longer in the LDC supply chain	Chain Reaction report: "Tunas Baru Lampung"	Not on approved purchase list	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
35	Tabung Haji	- PT Persada Kencana Prima; - Hydroflow Sdn Bhd; - Ladang Tabung Haji; - TH Pelata Meludam	No longer in the LDC supply chain	Chain Reaction report: "TH Plantations and PT Synergy Oil Nusantara"  Mighty Earth Rapid Response Report	Closed	Tabung Haji's suspended by LDC since 2018. LDC has engaged our trading partner and they has verified the evidence regarding this grievance. Now Tabung Haji has already complied to LDC's Re-entry procedure and back to LDC supply chain.
36	Tradewinds Plantation	Trans Kenyaland Sdn Bhd	No longer in the LDC supply chain	Mighty Earth Rapid Response Report	Closed	LDC engaged with trading partner. Our trading partner has verified the evidence and confirm that the alleged development is not within the concession area of the supplier.
37	Golden Agri Resources (previously under Tsani Hutani Abadi group)	- PT Kruing Lestari Jaya; - PT Rayatama Jaya; and - PT Harapan Rimba Jaya	GAR (H1 - 2024)	Mighty Earth Rapid Response Reports	Monitoring	On 7th Apr 2021, GAR officially announced the acquisition of PT Tsani Hutani Abadi ("THA"), PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya. As an RSPO-member, GAR will follow the RSPO Remediation and Compensation Procedure (RaCP) to address any past deforestation by the acquired companies and also to comply with the RSPO P&C.
38	WINGS	PT Indopenta Sejahtera Abadi (PT ISA)	No longer in the LDC supply chain	Mighty Earth Rapid Response	Closed	LDC has engaged the supplier. PT ISA has responded that they have done a HCS assessment with BIOREF IPB, and the alleged clearance is located outside the HCS area and also was not peat or primary forest, based on analysis of Ministry land maps, peat restoration agency and soil analysis.
39	Yayasan Pahang	YP Plantation Sdn Bhd	No longer in the LDC supply chain	Mighty Earth Rapid Response	Monitoring	LDC engaging with Trading Partner on this grievance. Below are the updates from our Trading Partner: a. The Board of YP Plantation has approved the implementation of NDPE policy in all plantation owned by YP Plantation Sdn Bhd. The official Sustainable Palm Oil Policy (in Bahasa Malaysia) dated 18 August 2020 from YP Plantation Bhd was provided and Mewah has already shared the policy to Mighty Earth. b. YP Plantation explained its decision to develop the oil palm plantation was basis approval from the local authorities and it adheres to the state regulations. A full EIA assessment has been conducted and approved by the Department of Environment. c. YP Plantation further explained that the Board of YP Plantation Sdn Bhd has issued a stop work order on the development of peat in the Gugusan Bebar concession in Pekan Pahang of 4,093.95 hectare on 17 August 2020. A stop work order has been issued on the remaining 800Ha unplanted area of the new development namely Ladang Pekan Timur and Ladang Pekan Barat. d. YP Plantation is engaged in discussions with a consultant - Dr. Faizal Parish, Director of the Global Environment Centre (GEC), to study potential remedial actions.  LDC continue to monitor the progress from Trading Partner.
40	Multiple Suppliers in Tesso Nilo National Park	- PT Tribakti Sarimas - PT Inti Indosawit Subur - PT Makmur Andalan Sawit - PT Cipta Riau Sarana - PT Berlian Inti Mekar - PT Sawit Mas Nusantara - PT Peputra Supra Jaya - PT Sugih Riesta Jaya	Apical, GAR, Permata Group, Sime Darby, Wilmar, Musim Mas (H1 - 2024)	Eyes of the Forest Report: "Enough is Enough"	Closed	On 8th June 2018, Eyes of the Forest Report: "Enough is Enough" was published that there was sourcing of FFB from illegal plantations from Tesso Nilo National Park and Bukit Tiga Puluh National Park  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.

**Direct:** refers to supply going directly to the **2 LDC Indonesia Refineries**

**Indirect:** refers to other traded oil, which is **not** sourced for the refineries but for the LDC Singapore Commercial trading arm

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's poor performance in palm.