

## Grievance List Update June 2018

Only cases reported from suppliers that are reported as direct or indirect suppliers in the previous 12 months and have not actively been delisted or from own operations

Date logged	Subject	Issue	Actions taken by IOI
Date logged Sep-16	Eagle High Plantations, indirect via trading partners:  • Wilmar  • Musim Mas  • GAR	Issue  Land clearing and no proper FPIC conducted as reported by Greenpeace in "A Deadly Trade Off"  Greenpeace report can be found here	Feb-18: For updates see websites of trading partners  Dec-17: Followed up with Eagle High plantation sustainability team on way forward. Management team is now conducting internal FPIC training for its sustainability team in order to restart FPIC process for the community surrounding this concession  Oct-17: IOI LC (now Bunge LC) conducted a site visit to Eagle High's PT VMA concession upon invitation to understand the situation on the ground.  Jun-17: continue to follow progress of Eagle High via trading partners.  Apr-17: based on our assessment we have seen significant progress on our requirements set in February.  Feb-17: We have informed our trading partners about specific requirements for Eagle High Plantations to
			specific requirements for Eagle High Plantations to ensure they are compliant with IOI's policy. We expect our trading partners to report progress on these requirements via their grievance lists or during
			meetings with IOI representatives. Follow up meetings are scheduled Mid-March 2017.



Sep-16	TH Plantations, indirect via trading partners:  • Wilmar	Land clearing as reported by Greenpeace in "A Deadly Trade Off"  Greenpeace report can be found here	Jun-17: Grievance list Wilmar reports that TH has stopped new developments.  Apr-17: Based on our assessment we found TH plantations to be non-compliant to our policy. We will inform our trading partners accordingly.  Feb-17: We have informed our trading partners about specific requirements for TH Plantations to ensure they are compliant with IOI's policy. We expect our trading partners to report progress on these requirements via their grievance lists or during meetings with IOI representatives. Follow up
Sep-16	TH Plantations: direct	Land clearing as reported by Greenpeace in "A Deadly Trade Off" (Group level risk, IOI is not sourcing for the reported areas)  Greenpeace report can be found here  IOI's spatial risk analysis classified the supplying mill of TH Plantations as a high priority mill	share an action plan to address outstanding issues  Dec-17: IOI will re-engage with TH in January for progress update  Aug-17: Situation remains unchanged  May-17: IOI had a constructive meeting with senior management from TH Plantations. The results of the field verification of Kota Bahagia mill and estates were



			is in conflict with IOI's policy and therefore we continue the suspension of TH plantation from our supply chain  Nov-16: TH Plantations invited IOI for mill verification.  TH and IOI have scheduled the mill verification for Mar-2017. IOI will contact senior management of TH once the report of the mill verification is available. In this meeting IOI will also address the other issues reported listed in our grievance list as well as milestones for re-engagement.  2016: On several occasions, IOI approached TH Plantations for an on-site mill and supply base verification. Since TH Plantations refused to collaborate, IOI decided to phase out TH Plantations from its supply chain.
2015	IOI concessions in Ketapang, West Kalimantan, Indonesia (SNA group: PT BNS, BSS & SKS)	RSPO complaint related to land clearing and illegal planting  RSPO case tracker: here	May-18: IOI received a query from Eric Wakker, Aidenvironment on the overplanting allegation against PT BNS. Aidenvironment and IOI have issued a joint statement earlier on 1 December 2016 that confirmed the PT BNS has abandoned the 434 ha of land, cleared and planted between 2010 and 2014, in line with the instruction issued by the Indonesian Ministry of Environment and Forestry (KLHK) until such a time as there are new Ministerial instructions regarding the said land.  In November 2017, PT BNS have received a letter from KLHK stating the validity of the Ministerial Decree dated 15 August 1992 that the "the land is



	considered Areal Penggunaan Lain (APL) and not "Hutan Produksi (HP)".
	Feb-18: According to the agreed "Term of reference" (ToR) with RSPO, a draft report from RSPO verification visit which ended on 29/1/2018, was to be shared with IOI by 7/2/2018. However, as of 26/2/2018, IOI has yet to receive such draft report from RSPO.
	Dec-17: Quarterly report on the progress action plan as recommended by RSPO CP has been sent to RSPO in October 2017. Final verification by RSPO CP is expected to be conducted January 2018.
	Oct-17: IOI continues to implement its action plan (see also the Sustainability Implementation Plan or SIP update) and is ready for another field verification by RSPO. RSPO has yet to confirm the dates.  Aug-17: IOI's action plan following the field verification report of the second RSPO field visit in February, was submitted to the RSPO CP on June 20 <sup>th</sup> . See case tracker RSPO.
	2017: IOI continues its near real time monitoring program on the Ketapang concessions.
	Feb-17: RSPO conducted field verification PT BNS and PT SKS, IOI is waiting for the report (including the report on BSS). IOI will continue to implement actions listed in the Sustainable Implementation Plan (SIP) and provide quarterly updates via its website.



			Dec-16: IOI Group and AE issued a joint statement in which parties jointly declared to have achieved agreement in closing the Ketapang complaint case. Aidenvironment has raised all other matters with IOI for perusal and declared that it has no further standing issues with IOI related to the Ketapang case. The above declaration has been achieved with IOI Group, independent of RSPO's decisions. The full Statement can be found on the IOI Group website.  Sep-16: RSPO conducted field verification PT BSS. Report not yet published
Nov-16	IOI Group estate Pamol Kluang	Labour violations and recommendations as reported by Finnwatch  Finnwatch reports can be found: here	Feb-18: IOI is implementing 3 new labour policies: installation of passport lockers on all estates, no recruitment fees and minimum wage policy. Update from IOI Group can be found here  Dec-17: updated social and labour policies IOI Group can be found: here  Oct-17: The BSR report is available at the IOI website (BSR Assessment Report) Discussions with RAN and Finnwatch resulted in an updated minimum wage policy and no recruitment fee guideline which will be published end of October. IOI senior estate management, HR and sustainability staff (including Loders representatives) was trained on both the BSR recommendations and the new policy and guideline.  Aug-17: BSR conducted field visits to Lahad Datu and Sandakan in Sabah in June. BSR Report will be available via IOI's website first week September.



			June-17: Final assessment reports Proforest and BSR expected in July.
			Apr-17: Based on this initial assessment Proforest and BSR conducted field assessments in IOI estates. The final assessment reports from BSR and Proforest are expected mid-May. Following the outcome of these assessment reports IOI will develop an action plan to address any gaps highlighted in the reports by the end of June. Progress on this action plan will be communicated via our grievance list every quarter starting, September 2017.
			Mar-17: BSR started initial desktop verification of corrective measures taken by IOI following the Finnwatch report.
			Jan-17: IOI has tasked BSR to verify the corrective measures taken by IOI following the Finnwatch recommendations (target date April-17). Based on BSR's findings, IOI may request for an additional verification of its estates. Furthermore, BSR will extend the Finnwatch investigations to Sabah in order to help IOI address specific issues in relation to foreign labor in the Sabah region. Work expected to start in April and finish, including recommendations and workshops, in June 2017.  Jan-17: IOI will implement the recommendations as provided by Finnwatch in their report published Nov 16.
2010	IOI Pelita located in Sarawak,	RSPO complaint related to	Feb-18: IOI and Grassroots jointly engaged with
	Malaysia	the NCR of communities in Sarawak Dispute Settlement	



Facility o		luding the comments of the CP. The CP will review revised action plan in their 28th March 2018
KSFO ca:		peting.
	RS: cor Res Tu trai wil stal	PO. Some of the activities has been started and inducted on the ground, such as Corporate Social sponsibility (CSR) in several areas namely Long yut, Long Teran Batu, and Long Tabing. The inslation of this document is in the final stage and l be shared with the local communities and keholders in second week of December 2017. IOI
		l not divest its share in IOI-Pelita as per statement I ( <u>here</u> )
	act	et -17: IOI and Grassroots have worked on a joint ion plan which is now being reviewed by Pelita. We bect to present the mutually agreed action plan to PO in November
	RS: pla 201 pla wit	g-17: A joint verification visit, IOI-Grassroots-PO (observer) to the local community at IOI-Pelita ntation in Sarawak was conducted from 3-7 July 17. IOI, Grassroots and RSPO discussed action as a way forward to address the land disputes the communities. Joint Action Plan is submitted to PO for review by Complaints Panel.
	IO trac ma wil	ne-17: RSPO CP acknowledged the letter sent by I and Grassroots (both available via RSPO case cker). RSPO is agreeable to the recommendations de on the mediation process. IOI and Grassroots I continue to work on the jointly agreed actions to be diet the process.



Apr-2017: Grassroots and IOI sent a joint letter to RSPO outlining jointly agreed actions that should result in resolution of the complaint while ensuring that the RSPO principles are upheld and fair process is observed by all parties involved
8 <sup>th</sup> March 2017: IOI received letter from coalition of NGOs titled: recommendations to resolve the LTK complaint in compliance with the RSPO P&C including 4 specific short actions IOI should now undertake to resolve this dispute. IOI responded to this letter. The response can be found here.
6 <sup>th</sup> January 2017: All Ketua Kampung have submitted additional requests communities to Residen. IOI has received copies.
20 <sup>th</sup> December 2016: Meeting between IOI-Pelia and community representatives (7 Ketua Kampung). RSPO and independent observer appointed by RSPO present. It was agreed that the communities would submit their additional requirements in writing to the Resident of Miri before December 31 <sup>st</sup> 2016.
1 <sup>st</sup> December 2016: IOI-LTK settlement agreement briefing. RSPO and independent observer appointed by RSPO present.
August 2016: Meeting with LTK community to discuss on the land issue and potential settlement agreement.
In collaboration with the Land Custody and Development Authority (LCDA) of Sarawak an



improved proposal has been put forward to the involved community representatives for reviewing by the communities. A follow up meeting is scheduled.  2015: An effort by the state government of Sarawak to resolve the issues; all parties agreed to this government initiative. In November 2015 a meeting held between the state government, IOI and the community in which an offer was made for compensation. The community did not accept the offer. A second mediation meeting was held in December. An independent observer from RSPO attended this second mediation meeting and submitted a report to the RSPO secretariat. Meetings were held in collaboration and support of RSPO with various NGOs, the most significant being the Meditation by Mr. Tim Offor from Pax Populus Australia in December 2011. Other reports on this matter includes Marcus Colchester Report of July 2013 and Ramy Bulan Report 2012/2015.  Despite the Appeals Proceeding and the subsequent decision of the Courts of Appeal and Federal Court, IOI and the LTK community continue to engage in dialogue to seek solutions beyond the jurisdiction of the legal system.  In April 2013, the Court of Appeal reversed the High Court decision stating that there was no evidence to support the claim for NCR over the 2 land parcels within IOI Pelita Provisional Lease. In July 2013, the
support the claim for NCR over the 2 land parcels
Federal Court had further dismissed the LTK
Community's application to appeal against the Court of Appeal's findings.



			2010: RSPO complaint against IOI Group, lodged by 11 international and grassroots NGO's and the local Long Teran Kanan community in Sarawak. The timeline of the complaint can be found via the RSPO case tracker.
			Dispute is referred for mediation through the Dispute Settlement Facility of the RSPO: RSPO case-tracker. Several attempts took place for settlement through mediation, meetings between IOI, representatives of communities and the RSPO DSF.
			In March 2010, the High Court of Sarawak found in favour of the plaintiff's claim for NCR. However, the high court did not grant an injunction against IOI Pelita nor did they declare the alienation of the Provisional Lease to be Null and Void. Instead the Court ordered the assessment of damages for compensation to the plaintiff.
			IOI, in Sept 2006 acquired shares in Rinwood Pelita Sdn Bhd and inherited the legal dispute. Upon acquisition of the shares, IOI Pelita managed to negotiate settlement with some of the LTK Community at approximately RM1,600 per hectare. It is also noted that Rinwood had also conducted some negotiations and provided compensation to segments of the LTK Community prior to IOI's share acquisition
Nov-16	Wilmar  PT Daya Labuhan Indah  PT Perkebunan Milano	Human and labor rights violations as reported by Amnesty International	Apr-17: Based on the BSR assessment provided by Wilmar, IOI is satisfied with the progress made so far. IOI continues to monitor progress via Wilmar's grievance list.



		The report from Amnesty International can be found: here	Mar-17: Wilmar to update IOI on BSR assessment  BSR conducted assessment, report due Feb-17. Due diligence audits performed on RSPO & ISCC requirements by independent auditors. IOI will monitor progress via Wilmar's grievance list
Mar-16	IOI concession PT KPAM in West Kalimantan, Indonesia	Illegal road construction	May 2018: The investigator team from Polres Ketapang received a report on land intrusion/illegal clearing. Following rounds of questioning from witnesses, the police have arrested an individual responsible for the illegal clearing. The site is now blocked with police lines.  May-18: IOI received query from Sinarmas on allegation of land clearing by PT KPAM. NPP submission was approved by RSPO on 13 May 2018. Illegal activities were found by our Sustainability Team and reported to Polres in April 2018. Currently Polres (Kepolisian Resor) is investigating the situation.  Feb-18: HCS peer review assessment still in progress. Near real time satellite monitoring program continues and detected no deforestation and fires within the concession. PT KPAM employs a team of 5 full time fire and patrol staffs to monitor any illegal activity.  Dec-17: IOI submitted HCS assessment for peer review to high carbon stock approach group (see <a href="http://highcarbonstock.org/registered-hcsassessments/">http://highcarbonstock.org/registered-hcsassessments/</a> )  IOI continues its near real time monitoring program on the Ketapang concessions.



			Sep-17: Another report was filed when IOI found that the illegal road construction activities had resumed. These activities ceased in December 2017 after Polres had asked them to vacate the area.  Nov-16: land clearing spotted outside top-end PT KPAM (outside IOI concession boundary). This development is not an IOI development.  Oct-16: Despite IOI Group's efforts to halt the activities and reports to the local authorities, activities and entries nonetheless have persisted. Therefore, IOI Group highlighted the issue in the NPP procedure to the RSPO secretariat. The locals diverted the road to an area outside the IOI concession boundaries.  June-16, Nicko Arywibowo (Legal Manager of SNA) reported both to the RSPO and the Polres that illegal road construction activities by third parties were found but subsequently stopped after the report was filed.  Apr-16: IOI Group discovered trespassers and unauthorized activities by 3rd Parties in PT KPAM via satellite images provided by Satelligence (near real time monitoring program). On-site verification confirmed illegal activities in form of road construction by locals. This was reported to PSPO
Dec-17	IJM Corporation, PT Prima	Alleged deforestation in PT	This was reported to RSPO.  June 18: IJM has shared their 12-month time bound
Dec-17	Bahagia Permai (PT PBP), Indonesia IJM is a direct supplier of Bunge Loders Croklaan (Bunge LC) thru IOI	PBP	action plan for the assessment and preparation of the HCSA. IOI will meet with IJM periodically to receive updates on the progress and look forward to the final recommendations and action plans.



	plantations in Malaysia, PT PBP does not supply into Bunge LC's supply chain	Feb-18: Our intel partner observed active clearing in Nov 17 and Dec 17. The IOI commercial team contacted IJM and requested an immediate stop clearing as well as an action plan to deal with these allegations and other policy gaps. IJM confirmed their commitments to "no deforestation" and "no peat planting". IJM completed an HCV study on PT PBP in 2014 and will engage with independent experts to conduct a HCS assessment in PT PBP. We will continue our dialogue with IJM.
Dec-17	NPC Resources, PT Sumber Alam Selaras (PT SAS), Indonesia  • NPC is a direct supplier of Bunge Loders Croklaan (Bunge LC) thru IOI plantations in Malaysia, PT SAS does not supply into Bunge LC's supply chain	June 18: NPC has informed IOI that their consultant have completed the field visits and site assessments and presently are at the stage of report preparations.  Meanwhile, NPC has agreed to start some preparation to safeguard and protect the conservation areas identified.  IOI will meet with NPC when the reports are finalized to discuss their action and monitoring plans to ensure compliance with our NDPE commitments.  Dec 17: Our intel partner observed active clearing in November – December 2017 and January 2018. The IOI commercial team contacted NPC and requested an immediate stop clearing as well as an action plan to deal with allegations and other policy gaps. NPC informed us that they have engaged an Indonesian environmental consultant who will commence immediately to look into the issues in their concession PT SAS. We expect and update by March 5, 2018.  NPC stated to have stopped further land clearing activities, however there are other works ongoing like



		road maintenance, etc. We have cautioned them of high likelihood of video or image capture by drones or satellite of site activities and we will continue to
		monitor NPC's activities in the months to come.