

**Grievance List Update December 2019****Preamble:**

As stated in IOI Group's Sustainable Palm Oil Policy, transparency is one of the important elements embedded within our sustainability commitment. Hence, IOI has established Grievance Lists that it publishes and updates regularly on the IOI Group webpage as part of IOI's commitments in enhancing transparency.

All the gathered and/or investigated allegations are captured in 2 specific grievances list:

- 1) Grievances related to Suppliers (Direct and Indirect Suppliers)
- 2) Grievances related to other issues such as Environmental, Social and Governance.

Grievances related to Suppliers (Direct and Indirect Suppliers)**Direct Suppliers**

Date logged	Subject	Issue	Actions taken by IOI
Sep-16	PT Persada Kencana Prima (PT PKP), TH Plantations PT PKP is not in our Supply Chain TH Plantations was a Direct supplier in Malaysia Ceased sourcing since October 2016	Land clearing as reported by Greenpeace in "A Deadly Trade Off" (Group level risk, IOI is not sourcing from the reported areas) Greenpeace report can be found here	Aug 18: IOI position of not sourcing from TH plantation since October 2016 remain unchanged. Feb 18: Position remains unchanged, TH did not 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 discussed as well as the ongoing clearing of peat in TH's Indonesian concessions.



		IOP's spatial risk analysis classified the supplying mill of TH Plantations as a high priority mill	We appreciate the feedback and clarification given by TH including TH's intention to continue clearing of peat areas. The latter is in conflict with IOI's policy and therefore we continue the suspension of TH plantation from our supply chain. For information before 2017, please see here .
Dec-17	PT Prima Bahagia Permai (PT PBP), IJM PT PBP is not in our supply chain. IJM is a direct supplier in Malaysia.	Intel consultants reported land clearing in Nov – Dec 2017: alleged deforestation in PT PBP	Nov 2018: The field visits for HCV-HCS assessment have been completed and the assessors are preparing the report. Sep 18: In the recent information sharing by IJM, in addition to their earlier agreed action to perform a HCS assessment, they will also be conducting FPIC on the reported land. They have made commitments to set aside undeveloped areas as a corrective measure should there be findings of deforestation. Jun 18: IJM has shared their 12-month time bound 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. Feb 18: Our intel consultant observed active clearing in Nov 17 and Dec 17. The IOI commercial team contacted IJM and requested an immediate stop of the clearing activities 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.



<p>Dec-17</p>	<p>PT Sumber Alam Selaras (PT SAS), NPC Resources, IJM</p> <p>PT SAS is not in our supply chain.</p> <p>IJM is a direct supplier in Malaysia.</p>	<p>Intel consultants reported land clearing between Nov 2017 to Jan 2018: alleged deforestation in PT SAS</p>	<p>April 2019: NPC has informed us that the HCV report has been peer reviewed and will proceed to peer review the HCSA report. And NPC will be drafting a Management action plan to address the findings and recommendations from these assessments.</p> <p>Jan 19: NPC's peer review of HCV-HCSA report completed. Currently, the feedbacks from the reviewers are being addressed.</p> <p>NPC have updated us that the Integrated Conservation Land Use Plan (ICLUP) is completed and is being reviewed along with the Water Management plan.</p> <p>Moving forward in March, NPC management will provide further documentation and reports of their completed actions progressively for our review and to ensure improvements are being implemented.</p> <p>Sep 18: NPC has made commitments to protect HCV/HCS areas and their consultant has prepared a Comprehensive Integrated Conservation Land Use Plan to meet NDPE requirements; Furthermore HCV/HCS assessments will be performed prior to any future new plantings.</p> <p>They have completed their HCV assessment and the report is undergoing peer review currently.</p> <p>NPC has put in place best management practices for peat areas and various SOPs for the management and monitoring of conservation areas as well as for any human-wildlife conflict.</p> <p>NPC's public statement on their commitments is shared in their website. https://www.npc.com.my/PublicStatement13Sep2018.pdf</p>
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			<p>Jun 18: NPC has informed IOI that their consultants have completed the field visits and site assessments and presently are at the stage of report preparations.</p> <p>Meanwhile, NPC has agreed to start some preparation to safeguard and protect the conservation areas identified.</p> <p>IOI will meet with NPC when the reports are finalized to discuss their action and monitoring plans to ensure compliance with our NDPE commitments.</p> <p>Dec 17: Our intel consultant observed active clearing in November to January 2018. The IOI commercial team has contacted NPC and requested an immediate stop clearing as well as an action plan to deal with allegations and other policy gaps.</p> <p>NPC informed 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.</p> <p>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.</p>
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July 2018	BLD Plantation Bhd (Direct supplier)	Mighty Earth (ME) Rapid Response Report of ground activities and alleged clearing of over 1000ha of forest between 2017 - 2018	<p>Jul 19: BLD, with the assistance of Earthworm Foundation, is making satisfactory transformation progress. In accordance to their commitments, they have prepared their NDPE policy implementation plan which includes a grievance mechanism and publishing of supplier mill list. The policy implementation plan details set time bound objectives and milestones. We are placing BLD into monitoring and will continue to engage and provide support.</p> <p>May 19: BLD has been working with Earthworm Foundation (EF) and has published their Sustainable Palm Oil Policy with NDPE commitments.</p> <p>EF is the advisory consultant and is supporting BLD in the crafting of a road map for the delivery and implementation of this policy and a grievance mechanism/procedure to address issues from both internal and external stakeholders.</p> <p>BLD has announced a moratorium on all future new development until the finalisation of their policy implementation plan. And there will be no development of peatlands regardless of depth and HCS and HCV assessment will be conducted for all future developments.</p> <p>May 19: BLD has finalised their NDPE policy and is circulating it with key stakeholders for comments.</p> <p>Key updates on action plan progress - BLD have completed safety and sustainability briefing to their stakeholders which include their workers and FFB suppliers. They have also reviewed and strengthened their water management plan for peat areas and added additional piezometers and subsidence pole.</p>
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			<p>Mar 19: BLD management team have briefed their workers on travel documents storage. And the workers are now holding and keeping their own passports. The workers also have the option to place the passport with the management for safekeeping if they wish to do so.</p> <p>Jan 19: Two field visits in December 2018 completed. The management provided us with full cooperation during the visit and assessments on environmental, social, safety and legal aspect were reviewed for compliance. BLD have commenced reviewing and enhancement of existing action plans to address gaps and weaknesses and have agreed to take steps and measures towards improvement with immediate effect.</p> <p>BLD have also prepared a sustainability policy and is currently in the process of sharing and socializing it to stakeholders for their understanding and feedback to garner support.</p> <p>IOI continue to work closely with BLD and our next engagement is scheduled for February and we hope to provide further support to drive change and progress.</p> <p>Sep 18: During our recent meeting with BLD in September 2018, there were visible improvements sighted towards transformation to deliver sustainable palm oil.</p> <p>However, according to BLD, there is a delay in the assessment and progress due to time and availability of the consultants. Because of this, BLD has failed to adhere to the datelines and unable to meet IOI's policy requirement, which states clearly that IOI will not source from any</p>
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			<p>supplier that does not abide by the NDPE policy. IOI have therefore imposed a moratorium on new contracts because of this breach.</p> <p>IOI will continue to closely monitor BLD current and future sustainability endeavours as we can see that they have put in place plans to manage their conservation areas; systems to enhance welfare and benefits for their workers and local communities; and to develop a traceable supply chain.</p> <p>We will continue to engage and encourage BLD to meet our policy commitments and for the adoption of a NDPE policy to support their transformation journey.</p> <p>Aug 18: They are now in the process of appointing a consultant to conduct HCV assessment and is reviewing various qualified parties to perform other assessments and gap analysis towards meeting NDPE requirements; and will update IOI upon finalization of the appointment and the commencement date of the assessments. Next follow-up on September 2018.</p> <p>Jul 18: BLD has responded in a formal letter and confirmed that the source has stopped further land clearance. They have explained the areas cleared are old logging land and now been earmarked for agriculture purposes. According to BLD, their Environmental Impact Assessment is in compliant with the State Government and its agencies requirements.</p> <p>Jun 18: IOI contacted BLD on the 12 June 2018 and requested they engage with the source of the clearance to seek their cooperation to immediately stop further works pending HCV and HCS assessments. IOI has also requested for actions to meet our policy gaps.</p>
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<p>Jun-17</p>	<p>Prosper/Tee Family/ Bewani Oil Palm Limited, PNG</p> <p>Bewani Oil products are not in IOI supply Chain</p> <p>Last Purchase September 2018</p>	<p>2017, Alleged deforestation in Bewani Oil Palm concession. There are common shareholders in Prosper and Bewani</p> <p>Greenpeace “Final Countdown” report citing Chain reaction research that 13,460 ha of deforestation occurred in Bewani</p>	<p>During 2017, IOI has contacted Prosper group Malaysia and Prosper confirm they have no investment outside of Malaysia and Bewani does not belong to them and it is not within their management control.</p> <p>During our follow-up engagements with Prosper throughout 2018, they have explained that Bewani is a separate investment by one of their shareholders and not Prosper.</p> <p>In Feb 2019, after much continual dialogues between Prosper and various Stakeholders, The shareholder from Tee family released an official letter on the divstment of shares held in Bewani - PNG Plantation Development Sdn Bhd.</p> <p>In May 2019, Prosper adopted a NDPE policy which was shared with all stakeholders.</p> <p>July 2019, Prosper engaged earthworm foundation to provide assistance to refine their NDPE policy and development a NDPE implementation plan and a grievance mechanism.</p> <p>In November 2019, Prosper has prepared a LUCA and has acknowledged the liability hectarage for the deforestation in PNG and has agreed to undertake conservation programmes as their recovery plan.</p> <p>We will continue to maintain dialogue and communication with Prosper.</p>
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Apr-19	<p>PT Citra Sawit Cemerlang (PT CSC), Genting Plantations Bhd</p> <p>PT CSC is not in our supply chain. But potential non-compliance at Group level. Genting is a direct supplier in Malaysia.</p>	<p>ME Rapid Response Report 14: 125 ha of forest cleared between Jan 2019 and March 2019</p>	<p>We have communicated the report to Genting Plantations and explained that forest clearance is a non-compliance to our NDPE policy and seek clarification from the site urgently.</p> <p>HCS assessment has been completed for PT CSC.</p> <p>We have also requested that further land clearance be stopped immediately if it is in the HCV/HCS areas.</p>
May-19	<p>PT Permata Sawit Mandiri (PT PSM), Genting Plantations Bhd</p> <p>PT PSM is not in our supply chain But potential non-compliance at Group level. Genting is a direct supplier in Malaysia.</p>	<p>Allegation that 84 ha of deforestation occurred between April - May 2019, ME Rapid Response Report 15.</p>	<p>Genting has confirmed that they have disposed of their interest in PT PSM in 2017 to a business partner and Genting does not has any management control over it.</p>
Nov-18	<p>PT Temila Agro Abadi (PT TAA), a subsidiary of Felda Global Ventures (FGV)</p> <p>PT TAA is not in our supply chain, but potential non-compliance at Group level.</p> <p>FGV is a direct supplier in Malaysia</p>	<p>ME Rapid Response Report 9: alleged burning of 84 Ha of Peat</p>	<p>The report alleged that 84 hectares of peat was burnt.</p> <p>FGV has responded that the burning was the work of the local community within the plasma areas.</p> <p>FGV, together with the local authorities, has also taken steps towards fire prevention by conducting awareness campaigns on open burning.</p> <p>FGV will continue to monitor the situation and will increase stakeholder engagements to educate the local communities on 'no open burning' and fire prevention.</p>



Mar-19	PT Sentosa Sukses Utama (PT SSU), subsidiary of Wings Group Indonesia	ME Rapid Response Report 12 reported 6 ha deforestation between 19 Nov 2018 to 12 January 2019	IOI has stopped purchased from Wings Group since August 2017.
	PT SSU is not in our supply chain but Wings Group is a direct supplier . Last purchase August 2017		
Aug-19	PT Menteng Jaya Sawit Perdana (not in our supply chain) Parent company is KLK Bhd who is one of our direct suppliers in Malaysia	ME Rapid Response Report No 18 citing 12ha of Peat development	KLK has explained that the alleged area is located within PT MJSP's permit area (Izin lokasi). It is however no longer within the management control of PT MJSP, as in Y2016 the area has been gazetted by Kementerian Lingkungan Hidup & Kehutanan ["KLHH"] as Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area. KLK has shared Ministerial Decree Letter – Surat Keputusan Menteri from KLHH and also the HTR Maps. Some old planting of palm in the areas by PT MJSP during 2009-2011 will be surrendered to the Gapoktan. KLK will provide updates and information progressively. In addition, we target to engage with KLK on a quarterly basis on this issue and to follow up on the surrendering of previously planted Palms.



Aug-19	Trans Kenyalang Sdn Bhd (not in our supply chain) Parent company – Tradewinds Plantation Bhd is a direct supplier	ME rapid response report 18 has cited 94 ha of peat forest development	Sept 19: Tradewinds has provided a satellite land use change detailing the clearing is outside of their concession boundary. Please refer to the documented evidence here. Aug 19: Tradewinds has shared images and confirmed that the land clearance is not inside their boundaries. The peat development is by a 3rd party and not Tradewinds.
Aug-19	FGV Holdings	NGO Coalition petition – Forced Labour and Human Trafficking on Felda/FGV plantation https://laborrights.org/sites/default/files/publications/FGV_Tariff_Act.pdf	Felda has updated stakeholders that they have made corrections for most of the issues raised by the NGO coalition. And the issue covering legalization of foreign workers in Sabah will require consultation with the government which is targeted to be completed by end 2019. FGV is planning now for independent audits of their entire labour recruitment SOPs which is targeted to commence within Q3 2019 http://www.fgvholdings.com/fgvs-response-to-the-petition-by-a-coalition-of-ngos-submitted-to-the-united-states-customs-and-border-protection/
Sept 2019	Sime Darby Plantation	ME Rapid Response Report No. 19 states 8 ha of deforestation in one of their Sarawak concessions between Feb - Aug 2019.	Sime Darby Plantation has shared their investigation report and their official response which confirms that there were no land clearing/deforestation within their estate boundaries as reported by ME. The GPS coordinates in the ME Report 19 is the area of another agricultural company. The letter can be viewed here .



Dec 2019	<p>PT Bulungan Surya Mas Pratama, PT BSMP</p> <p>Oil from PT BSMP, Indonesia are not in IOI supply chain</p> <p>Global Enterprise Sdn Bhd is a direct supplier to IOI in Malaysia.</p>	<p>ME Rapid Response No. 21 states 17 ha of deforestation between Jan – Oct 2019 in PT BSMP.</p> <p>According to the report, PT BSMP is part of Global Enterprise Sdn Bhd.</p>	<p>Global Enterprise Sdn Bhd has checked on the ground and explained that the land clearing is outside the concession boundary of PT BSMP and it is not part of their land and the clearing is not performed by them.</p> <p>We are waiting for some site report for final confirmation.</p>
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Indirect Suppliers			
Sep-16	<p>TH Plantations, indirect via trading partners:</p> <ul style="list-style-type: none"> • Wilmar <p>(Indirect supplier)</p>	<p>Land clearing as reported by Greenpeace in “A Deadly Trade Off”</p> <p>Greenpeace report can be found here</p>	<p>Aug 18: Continuous monitoring through Wilmar’s grievance list.</p> <p>Feb 18: Refer to grievance list Wilmar</p> <p>Aug 17: Refer to Wilmar’s grievance list, next step depends on the Action Plan as reported by Wilmar.</p> <p>Jun 17: Grievance list Wilmar reports that TH has stopped new developments.</p> <p>Apr 17: Based on our assessment we found TH plantations to be non-compliant to our policy. We have also informed our trading partners.</p> <p>Feb 17: IOI have informed 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 meetings are scheduled mid-March 2017.</p>



Apr-19	Hydroflow Sdn Bhd TH Plantations , indirect via trading partners	Allegation of 161 ha of peat forest development between Jan to March 2019, ME Rapid Response Report 14	No purchase from Hydroflow Sdn Bhd
May-19	Ladang Tabung Haji TH Plantations , indirect via trading partners	Allegation of 22 ha of deforestation between March – May 2019, ME Rapid Response Report 15	No purchase from Ladang Tabung Haji
Nov-16	Wilmar <ul style="list-style-type: none"> • PT Daya Labuhan Indah • PT Perkebunan Milano (Indirect supplier)	Human and labour rights violations as reported by Amnesty International The report from Amnesty International can be found: here	Aug 18: Continuous monitoring the progress update via Wilmar's grievance list. 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. 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-19	Samling Group LPF/0008 Marudi & Batu Belah LPF/0006 Samling-Lana Indirect supplier	ME Rapid Response Report 11 and 13 alleged that between Jan 2019 to Feb 2019, 44 ha of forest was cleared; and also alleged clearance of 104 ha of forest between Sept – Nov 2018.	Samling Group has explained that these are licenced plantation forest areas (LPFs) for other timber products and they do not plant oil palm in these LPFs. Trading partners have visited sites and confirm it as acacia harvesting and not oil palm development.



May-19	Samling Group Jelalong LPF 007 Part 1 & 3	ME Rapid Response Report 15 alleged that a total of 48 ha of stacking lines and 13 ha of deforestation	Samling Group has explained that these are licenced plantation forest areas (LPFs) for other timber products and they do not plant oil palm in these LPFs.
May-19	Glenealy Plantation Samling Group Indirect supplier	Intel consultant has highlighted forest clearing of 59ha in Bintulu between Jan-Mar 2019	IOI has reached out to Glenealy concerning land clearance activities as it is a potential conflict of our Sustainable Palm Oil Policy. Preliminary checks have indicated that this is the result of 3 rd party encroachment and Glenealy has lodged a police report. Glenealy will continue to monitor this
Jul-19	Syarikat Samling Timber Sdn Bhd (LPF 0014) Samling Group Indirect Supplier	ME Rapid Response Report 17 alleged that there has been 6 ha of Peat Development	Samling Group has explained that these are licenced plantation forest areas (LPFs) for other timber products and they do not plant oil palm in these LPFs.
Jul-19	Southwind Plantation Sdn Bhd WTK Group Indirect Supplier	ME Rapid Response Report 17 alleged that there has been 23 ha of deforestation	WTK has explained that the land clearance is by the local native community and they have received funding from Malaysian Palm Oil Board to assist with income and livelihood.
Aug-19	PT Tunas Borneo Plantation – PT TBP Indonesia Not in our supply chain.	ME rapid response report 18 has cited 13 ha of forest clearance	Sept 19: Samling has shared ground photos from site showing that the clearings are not planted with oil palm. There are also presence of local communities built structures and mining activities detected. Please send to grievance@ioigroup.com for more information.



	But Samling group is the owner of PT TBP is an indirect supplier in Malaysia		Aug 19: IOI do not source oil from PT TBP. Samling explained that the land clearing is not inside their concession boundaries. They have furnished site information and photos explained that the clearings are partly done by a neighbouring mining company and also by the local communities.
Aug-19	TH Pelata Meludam Sdn Bhd Parent company TH Plantation is an indirect supplier	ME Rapid Response Report No 18 citing 4 ha of peat development	No Purchase from TH Pelata Meludam Sdn Bhd
Sept-19	Empresa (M) Sdn Bhd OT/0351 Parent Company Yuwang Indirect Supplier	ME Rapid Response 17 has cited 4 ha of deforestation	IOI has engaged with our trading partner that any land clearing must be in compliance with our NDPE policy. Our trading partner is checking on this land use change.
Dec 2019	IOI purchase from Timrest Sdn Bhd which sourced from Rimbunan Hijau Group .	ME Rapid Response Report No. 21 states 15 ha of deforestation in one of the estates under Rimbunan Hijau Group between May – Sept 2019.	Rimbunan Hijau is an Indirect Supplier. We have raised the issue with our suppliers that any land clearance which does not comply with NDPE does not meet our policy commitments. Suspended purchase since Dec 2019.
Dec 2019	Rimbunan Sawit Sdn Bhd (Simunjan Estate) Rimbunan Hijau Group	ME Rapid Response Report No. 21 states 12 ha of deforestation between Sept	Rimbunan Hijau is an Indirect Supplier. We have raised the issue with our suppliers that any land clearance which does not comply with NDPE does not



		2018 – April 2019.	meet our policy commitments. Suspend purchase since Dec 2019.
Dec 2019	IOI purchased from PT Rim Capital PT Rim Capital sourced from Goodhope	ME Rapid Response Report No. 19 states 6 ha deforestation between March and Aug 2019.	We have engaged with PT Rim Capital and they are now seeking clarification from Goodhope on this matter.
Dec 2019	Alambumi Group Alambumi Sdn Bhd	ME Rapid Response Report No. 19 states 6 ha deforestation between March and Aug 2019.	This case has been updated by ME and listed under the name of BBC Holdings Sdn Bhd in report 21. Please refer to entry in “Does not enter into IOI Supply Chain”



Does Not Enter into IOI Supply Chain			
Sep-16	Eagle High Plantations Not in our supply Chain	Land clearing and no proper FPIC conducted as reported by Greenpeace in “A Deadly Trade Off” Greenpeace report can be found here	<p>Aug 18: Continuous monitoring via trading partners.</p> <p>Feb-18: Trading partners also details progress and updates in their website.</p> <p>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.</p> <p>Oct 17: IOI Loders Croklaan (now Bunge Loders Croklaan) conducted a site visit to Eagle High’s PT VMA concession upon invitation to understand the situation on the ground.</p> <p>Jun 17: Continue to follow progress of Eagle High via trading partners.</p> <p>Apr 17: Based on our assessment we have seen significant progress on our requirements set in February.</p> <p>Feb 17: IOI have informed trading partners about specific requirements for Eagle High Plantations to ensure they are compliant with IOI’s policy. We also 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.</p>
Jul-18	PT Mulia Inti Perkasa, subsidiary of Widya Corporation	ME Rapid Response Report 6: alleged 30 Ha forest clearance between May – July 2018	Feb-19: We have regularly engaged and communicated to our trading partners concerning compliance with our NDPE Policy. And our partners, themselves, possess similar standards, policies and requirements.



	Not in our supply chain.		<p>During Oct 2017 GAR started engagement with Widya. And in Dec 2017, GAR communicated to Widya to stop land clearance and conduct HCV/HCS assessments. Wilmar similarly reached out to Widya at the end of 2017 to communicate a similar message.</p> <p>Widya agreed to stop work and performed the necessary field studies. The HCS and HCV assessment were performed during August/September 2018.</p> <p>Our partners maintaining monthly monitoring and communication with Widya.</p>
Nov-17	<p>PT Agrinusa Persada Mulia and PT Agrprima Cipta Persada, subsidiaries of Gama Group</p> <p>Not in our supply chain.</p> <p>Trading partners have ceased sourcing since 22 June 2018</p>	<p>ME Rapid Response Report 3 and 4: alleged 2,847ha cleared in 2015 and 2016; and also alleged clearing of 70 ha between Nov 2017 to Jan 2018;</p>	<p>May-19 Trading partners have advised that Gama is making good satisfactory progress and are putting Gama into monitoring.</p> <p>Feb-19: Gama, working closely with Aidenvironment, has released their action plan framework towards meeting NDPE commitments. Aidenvironment has also shared some updates on Gama's work.</p> <p>IOI have regularly engaged and communicated to our trading partners concerning compliance with our NDPE Policy. And our partners, themselves, possess similar standards, policies and requirements.</p> <p>Wilmar cease sourcing from GAMA on 22 June 2018</p> <p>September 2018 GAMA issued their NDPE Policy which includes stop work orders.</p>
Oct-18	<p>PT Sumatera Jaya Agro Lestari, subsidiary of Incasi</p>	<p>ME Rapid Response Report</p>	<p>Feb-19: IOI has regularly engaged and communicated to our trading partners concerning compliance with our</p>



	<p>Raya Group</p> <p>Not in our supply chain</p>	<p>10: alleged that between Aug 2018 to Oct 2018, 27 ha of forest was cleared and another two area of 12 ha and 61 ha of peat were developed.</p>	<p>NDPE Policy. And our partners, themselves, possess similar standards, policies and requirements.</p> <p>Musim Mas has engaged with Incasi during February 2019. Both parties agreed to have dialogue and cooperation to achieve sustainability requirements.</p> <p>http://www.musimmas.com/sustainability/group-supplier-engagement-grievance/grievance-list/incasi-roya</p> <p>We have informed trading partners that the site activities per report does not comply with our policy commitments.</p>
Mar-19	<p>Linau Sinar Sdn Bhd</p> <p>Shin Yang Group / Sarawak Oil Palms Group</p> <p>Not in our supply chain.</p>	<p>ME Rapid Response Report 13 is citing that between Dec 2018 to Jan 2019, 10ha of peat was developed</p>	<p>Mar-19: We have informed our trading partner to seek clarification and secure an explanation about this allegation that is non-compliant with our NDPE policy.</p>
Jan-19	<p>PT Pinang Witmas Abadi –</p> <p>Pundi Group</p> <p>Not in our supply chain.</p> <p>Trading partners have ceased sourcing since December 2018.</p>	<p>ME Rapid Response Report 11 and 12 is citing peat forest clearance from July 2018 to Jan 2019</p>	<p>Trading partners have ceased sourcing since December 2018</p>
Apr-19	<p>PT Arjuna Utama Sawit,</p> <p>PACTRA Group</p> <p>Not in our supply chain.</p>	<p>ME Rapid Response Report 14 alleged that 33ha of forest was cleared between Jan 2019 and Feb 2019</p>	<p>We have communicated this potential NDPE non-compliance to our trading partners and they confirmed no purchase from Pactra Group for more than 24 months.</p>



	No volumes from Pactra group in our supply chain for the past 24 months		
Apr-19	PT Kahayan Agro Plantation, Anglo Eastern Plantations (AEP) Not in our supply chain.	ME Rapid Response Report 14 alleged that 189ha of forest was cleared between May 2018 - April 2019	Apr 19: We have communicated the allegation to our trading partner and explained that these ground activities is a potential non-compliance with IOI NDPE commitments. Trading partners have been engaging with AEP and they have completed the HCV/HCS assessment. The detected land clearance was one part due to entry-encroachment onto the concession by local communities and partly due to GPS error during land preparation. Trading partner will continue to engage and monitor
Aug-19	PT Makmur Jaya Malindo – PT MJM Not in our supply chain PT MJM WAS a subsidiary of Pinehill Pacific Bhd Pinehill Pacific was an indirect supplier to IOI.	ME Rapid Response Report No 18 citing 21 ha of deforestation	IOI do not source oil from PT MJM. Pinehill Pacific Bhd was previously an indirect supplier to IOI in Malaysia. However Pinehill Pacific Bhd has divested their Malaysian operations and they are no longer associated with PT MJM. No purchase from Pinehill Pacific and PT MJM
Sept-19	PT Kurun Sumber Rezeki (PT KSZ) Parent Company is CB Industrial Product	ME Rapid Response 17 has cited 65 ha deforestation in Kalimantan	IOI does not purchase from PT KSZ and CB Industrial Product Holding / Jhonlin Group.



	Holding / Jhonlin Group		
Dec 2019	<p>BBC Holdings Sdn Bhd is connected with Alambumi Plantation Sdn Bhd</p> <p>Alambumi and BBC are not IOI supply chain</p> <p>Not in our supply chain</p>	<p>ME Rapid Response Report No. 21 states 6 ha deforestation between March and Aug 2019. Internal Monitoring Consultant – Aidenvironment October 2019 Report</p>	<p>Our Internal monitoring consultant has clarified that the company alleged with deforestation was Alambumi Plantation Sdn Bhd instead of Alambumi Sdn Bhd.</p> <p>The company name is almost similar to one of our indirect supplier (Alambumi Sdn Bhd) but it is not related.</p>