

## Corporate Human Rights Benchmark 2020 Company Scoresheet

**Company Name** Wilmar International  
**Industry** Agricultural Products (Supply Chain and Own Operations)  
**UNGP Core Score (\*)** 18.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
2	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>18.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: UNGC principles 1 &amp; 2: The company 'supports that ten principles of the Global Compact with respect to human rights.' [Global compact commitment letter, 2008: <a href="https://s3-us-west-2.amazonaws.com/...">s3-us-west-2.amazonaws.com</a> &amp; Wilmar International Limited _ UN Global Compact, N/A: <a href="https://unglobalcompact.org/">unglobalcompact.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: UNGPs: The Company commits to 'implementing and complying with the UN Guiding Principles on Business and Human Rights, International Labour Organization's conventions'. Information found in the Sustainable Report 2019 uses 'guided by', which is not accepted wording following CHRB wording criteria. [Sustainability Report 2017, 2017: <a href="https://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2019, 05/2020: <a href="https://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company is committed to support the ten principles of the Global Compact. [Global compact commitment letter, 2008: <a href="https://s3-us-west-2.amazonaws.com/...">s3-us-west-2.amazonaws.com</a>]</li> <li>Met: Explicitly list All four ILO for AG suppliers: The No Deforestation, No Peat and No Exploitation policy includes commitments to each ILO core area. With respect freedom of association and collective bargaining, the Company states: '[...] we will respect the rights of personnel to form and join trade unions of their choice, and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, parallel means of independent and free association and bargaining should be made available to all such personnel.' The provisions of the policy apply to 'all third-party suppliers'. [Human Rights Policy, 01/2018: <a href="https://wilmar-international.com">wilmar-international.com</a> &amp; No Deforestation, No Peat, No Exploitation Policy, 11/2019: <a href="https://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Explicit commitment to All four ILO Core: The Company's No Deforestation, No Peat and No Exploitation policy contains commitment to each ILO core considered in this datapoint. In relation to collective bargaining and freedom of association, the Company adds that 'Where the right to freedom of association and collective bargaining are restricted under law, parallel means of independent and free association and bargaining should be made available to all such personnel'. [Human Rights Policy, 01/2018: <a href="https://wilmar-international.com">wilmar-international.com</a> &amp; No Deforestation, No Peat, No Exploitation Policy, 11/2019: <a href="https://wilmar-international.com">wilmar-international.com</a>]</li> <li>Met: Respect H&amp;S of workers: The company is committed to respect the health and safety of its workers. [Workplace Health and Safety Policy, 01/04/2019: <a href="https://wilmar-international.com">wilmar-international.com</a>]</li> <li>Met: H&amp;S applies to AG suppliers: The company indicates that "in its supply chain, Wilmar strives to respect and protect human rights (...) and provide a safe, clean and healthy workplace and living environment". [Human Rights Policy, 01/2018: <a href="https://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Commits to stakeholder engagement: The Company indicates that 'Wilmar commits to actively and constructively engaging with all stakeholders, including communities, governments, customers and CSOs at the local, national and international level. This includes a commitment to make information regarding the impacts of Wilmar's operations publicly available in formats and languages relevant to the affected stakeholders'. [No Deforestation, No Peat, No Exploitation Policy, 11/2019: <a href="https://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: The Company indicates on its website: 'We carefully consider the interests and key concerns of our stakeholders in our strategy, management decisions and operations. [...] We will publish implementation plans, provide regular public updates on implementation of these policies and invite stakeholders to provide input where possible'. However no statement of commitment found to engage with affected stakeholders (workers, suppliers, communities, supplier workers, etc.) in the development or monitoring of the human rights approach. [Stakeholder engagement, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Regular stakeholder design engagement: In addition, in its Annual Report 2019, the Company indicates: 'In November 2019, we published an updated NDPE policy following an extensive consultation process with stakeholders including nongovernmental organisations (NGOs) and subject matter experts. The updated policy is better aligned with globally recognised frameworks and guidance, and incorporates our commitments to health and safety, human rights and whistleblowing.'; and in its Sustainability Report: 'We are active participants in joint partnerships and various multi-stakeholder platforms to promote, respect and provide support for human rights. This includes consulting with human rights experts and civil society organisations to ensure feedback is received. Over the last three years we have collaborated with our technical partner and expert, Verité. During this time, we developed and are implementing robust solutions to address systemic labour issues in our operations, [...]' However, it is not clear that it engages with affected or potentially affected stakeholders (i.e. local communities, suppliers' workers, local authorities, etc.). [Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Annual Report 2019, 03/2020: <a href="http://wilmar-iframe.todayir.com">wilmar-iframe.todayir.com</a>]</li> </ul>
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to remedy: The Human rights framework states that 'Wilmar maintains a clear and strong commitment to non-violence and will do whatever possible, in all context, to prevent the use of force or the threat or real application of violence, and to ensure that parties adversely impacted by our operations and practices have access to remedy. [...] Our approach: Providing access to remedy with no reprisal ; [...] Identifying corrective actions and remediation processes for verified issues and grievances within the relevant operations'. [Human Rights Framework, 01/05/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts: The Company indicates: 'To ensure our supplier's continued compliance, we have put in place several means of checks and reporting so that we can identify when there are non-compliances or areas where improvement is needed. This will enable Wilmar to provide support and know-how to our suppliers to help them with compliance. These are: [...]; Corrective actions and remediation process; [...]' However, it is not clear whether the corrective actions and remediation process is aimed to provide remedy to affected individuals, more than to correct non-compliances identified as part of the monitoring process, or how the Company works with its suppliers to provide this remedy to victims. [Human Rights Framework, 01/05/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Senior responsibility for HR: The Company indicates that its 'Sustainability department is spearheaded by the Chief Sustainability Officer, led by the Group Sustainability General Manager and staffed by over sixty employees worldwide. The department is responsible for implementation of the Group's sustainability strategies'. The Company's sustainability strategy and policies 'cover the environment, health and safety, equal opportunities, human rights, labour rights, child protection, and food safety'. Similar evidence is provided on its website: 'Wilmar's Sustainability Department is led by the Chief Sustainability Officer with the General Manager – Group Sustainability in charge of day-to-day management'. [Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Governance Structure, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: According to its website: 'Staffed by over sixty employees across our global offices and sites, the Sustainability Department works in collaboration with all business and operational units to implement the Group's multifaceted sustainability strategies and initiatives. A combination of local and technical expertise throughout Asia, Africa and Europe enables the Department to oversee implementation of the NDPE policy, other sustainability related policies, sustainability certification, supply chain monitoring, conservation, research &amp; development, stakeholder engagement, and reporting'. [Sustainability Governance Structure, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Day-to-day responsibility for AG in supply chain: As indicated above: 'A combination of local and technical expertise throughout Asia, Africa and Europe enables the Department to oversee implementation of the NDPE policy, other sustainability related policies, sustainability certification, supply chain monitoring'. [Sustainability Governance Structure, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: Regarding the programme Verité, the company indicates that 'The programme began with ground verifications to understand risks at both macro and micro levels followed by the driving recurrences of issues despite having various policies and procedures already in place. Primary areas of concern related to issues on child labor, practices revolving around wages, casual labor, gender discrimination as well as health and safety. Simultaneously, Verité conducted independent and confidential stakeholder consultations in order to verify progress while validating some of the solutions that have been proposed or implemented. (...) The scope of this programme is specific to Wilmar's North Sumatra operations'. [Strengthening Labour Practices, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Identifying risks in AG suppliers: The Company indicates about its due diligence 'Typically, 50 to 200 mills supply one refinery and it is impossible to carry out assessments along Wilmar's NDPE Policy requirements at every mill. With over 20 palm refineries in Indonesia and Malaysia, and hundreds of mills in our supply shed, we have adopted a risk based approach to due diligence. Focus is first placed on identifying and creating transformation in areas with commercial importance, as well as higher risk in terms of environmental and social impact, before progressing to medium and low risk areas. Based on these initial criteria, we have chosen nine key refineries covering six key landscapes in Malaysia and Indonesia. In addition, we are also implementing parts of the programme with selected suppliers in Latin America and West Africa'. In addition, it discloses information about its SRT system, that identifies risks in supplier mills: 'The SRT allows us to collate reports on specific NDPE related criteria as reported by each supplier mill. Based on the reports, we are able to utilise the SRT to identify potential risks within our direct mill suppliers. The criteria that are reported on include: [...]; Child protection; Occupational health and safety; Labour rights and standards; Access to grievance mechanisms; Free, Prior and Informed Consent (FPIC); Legal and customary (or traditional) land rights; Traceability. We first identify a risk assessment score based on geospatial analysis which includes legality of land use, occurrence of protected areas, prevalence of fire and/or recent deforestation, and existence of forest and peat. Mills are scored and ranked for individual indicators of risk and for their overall combination. Mill-based environmental risk is then combined with certification status and grievances for an overall mill-based risk score. The SRT results are then integrated with risk assessment scores to determine the "risk level" '. [Supply Chain Transformation, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: It is stated that: 'The Aggregator Refinery Transformation (ART) programme was built to strengthen every actor in the supply chain to promote transformation, providing a collaborative framework for refiners, millers and growers with an opportunity to work closely to overcome challenges faced on the ground. [...] Typically, 50 to 200 mills supply one refinery and it is impossible to carry out assessments along Wilmar's NDPE Policy requirements at every mill. With over 20 palm refineries in Indonesia and Malaysia, and hundreds of mills in our supply shed, we have adopted a risk based approach to due diligence. Focus is first placed on identifying and creating transformation in areas with commercial importance, as well as higher risk in terms of environmental and social impact, before progressing to medium and low risk areas. Based on these initial criteria, we have chosen nine key refineries covering six key landscapes in Malaysia and Indonesia. In addition, we are also implementing parts of the programme with selected suppliers in Latin America and West Africa. At year-end 2017, we have conducted 69 assessments in these areas. These assessments are compiled into anonymised overarching reports by landscape, and each report summarises representative issues that may be prevalent in that landscape. Through Broad-Level Engagement (BLE) workshops, we socialise the common issues to all suppliers operating in that region and share learnings and recommendations for improvement'. [Supply Chain Transformation, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: In consultation with stakeholders: The Company describes actions carried out to improve labour rights in collaboration with stakeholders. However no evidence found of the Company consulting with affected stakeholders in the identification of human rights issues that it potentially faces. No evidence found in latest documents. [UK Modern Slavery Act Transparency Statement 2018, 01/01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: In consultation with HR experts: As indicated above, the Company has a programme with Verite. However, the scope seems focused in one region. [UK Modern Slavery Act Transparency Statement 2018, 01/01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Strengthening Labour Practices, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Triggered by new circumstances: The Company indicates in its Sustainability Report that 4.5% of all the palm oil products we handle, trade and process are RSPO certified.' The RSPO requires: 'A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations' However, this certification is focused on Palm Oil, and only 4.5% of the palm oil products are RSPO certified. [RSPO - Principles and criteria for the production of sustainable palm oil, 2018: <a href="http://rspo.org">rspo.org</a>]</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR): The Company indicates in its Sustainability Report that 4.5% of all the palm oil products we handle, trade and process are RSPO certified'. The RSPO requires: 'A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations'. However, no details found of the Company explaining when social impact assessments that include human rights will be carried out (current evidence only indicates that RSPO certification requires a SEIA). [RSPO - Principles and criteria for the production of sustainable palm oil, 2018: <a href="http://rspo.org">rspo.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The company indicates: 'Through our collaboration with Verité, we explore systemic human rights and labour rights risks that can occur in plantations, specifically in the Indonesian context. Since we began the partnership in 2017, we have undergone a 12-month programme and developed a three-year strategy to change mindsets and entrench sustainability as a priority approach for our company. We have since improved worker pay and conditions at PT. Daya Labuhan Indah and PT. Perkebunan Milano in North Sumatra. We continue to raise awareness [...] and screening for emergent labour issues'. As indicated below, the programme included identification and assessment. In addition, the Company provides information with respect its ART system on its website: 'Typically, 50 to 200 mills supply one refinery and it is impossible to carry out assessments along Wilmar's NDPE Policy requirements at every mill. With over 20 palm refineries in Indonesia and Malaysia, and hundreds of mills in our supply shed, we have adopted a risk based approach to due diligence. Focus is first placed on identifying and creating transformation in areas with commercial importance, as well as higher risk in terms of environmental and social impact, before progressing to medium and low risk areas. Based on these initial criteria, we have chosen nine key refineries covering six key landscapes in Malaysia and Indonesia. In addition, we are also implementing parts of the programme with selected suppliers in Latin America and West Africa. At year-end 2017, we have conducted 69 assessments in these areas. These assessments are compiled into anonymised overarching reports by landscape, and each report summarises representative issues that may be prevalent in that landscape. Through Broad-Level Engagement (BLE) workshops, we socialise the common issues to all suppliers operating in that region and share learnings and recommendations for improvement'. [Supply Chain Transformation, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company indicates that, following ground verifications to understand risks at macro and micro level, the programme followed by the driving recurrences of issues despite having various policies and procedures already in place. Primary areas of concern related to issues of child labor, practise revolving around wages, casual labor, gender discrimination, as well as health and safety'. The document indicates that the scope is specific to North Sumatra operations and applicable 'throughout our Indonesian operations'. [Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company has the Aggregator Refinery Transformation Programme. As part of the ART, the Company has 'conducted 69 assessments in these areas [Malaysia, Indonesia, Latin America and West Africa]. These assessments are compiled into anonymised overarching reports by landscape, and each report summarises representative issues that may be prevalent in that landscape. Through Broad-Level Engagement (BLE) workshops, we socialise the common issues to all suppliers operating in that region and share learnings and recommendations for improvement.' However, no further information found with respect this share learning and recommendations for improvement as part as a global Action Plan to face salient human rights issues. The Company seems to take specific action plans to some issues, as indicated below, although no evidence found of a description of a general system that allows to address or mitigate systematically human rights salient issues including own operations. In the context of the programme of Verité, 'after identifying gaps and receiving recommendations, the management formed a Core Team comprising of management personnel from multiple states and mills together with operations and sustainability personnel to work closely with Verité for the programme. Wilmar has since, with the assistance and support from Verité, set up systematic sustainability goals and targets, developed a strategy and provided tools and knowledge to its personnel to raise awareness on human rights and labour issues in plantations'. However, as previously indicated, this programme and system is focused in North Sumatra, and applicable to Indonesian operations in palm oil. No evidence found of a company-wide system to systematically mitigate its salient human rights issues (issues covering all the different activities of the Company). The Company has provided additional comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Supply Chain Transformation, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Including in AG supply chain</li> <li>• Met: Example of Actions decided: The Company indicates that 'for many years, the issues of casual labor, health and safety and gender discrimination have not been recognized as such across the Indonesian palm oil industry usually because of how things have been done. It does not mean that just because corrective actions have been carried out, the implementers were convinced that a particular situation is an issue that needed to be solved. As an example of action plan, the Company reports capacity building series for suppliers in collaboration with 'Business for Responsibility' and other MNEs to 'take collective action to improve working conditions and livelihoods of workers across the wider palm oil supply chain in Indonesia'. 'The workshops were tailored for Wilmar suppliers, comprising of small and medium plantation companies with targeted participation from their human resource personnel [...] The workshops are designed to heighten awareness on core human and labour rights issues relevant to the palm industry, including wages, employment contract status, grievance mechanisms and children rights'. It also indicates in its Sustainability Report: 'Through our collaboration with Verité, we explore systemic human rights and labour rights risks that can occur in plantations, specifically in the Indonesian context. Since we began the partnership in 2017, [...] We have since improved worker pay and conditions at PT. Daya Labuhan Indah and PT. Perkebunan Milano in North Sumatra. We continue to raise awareness throughout our operations while we work to mitigate labour rights risks issues in priority areas, namely exploring possible root causes of child labour, understanding the link between work and pay practices. [Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective: The Company indicates that its Grievance Procedure 'enables any stakeholder to raise a grievance against any party in Wilmar's supply chain and / or our own operations'. Moreover the Company has a dashboard that 'ensures that we are responsive to our stakeholders' concerns, and is regularly updated with the latest information on grievances, traceability, certifications, policies and statements'. Also, the Company indicates on its website that it has the Supplier Reporting Tool (SRT), however, it works assessing their suppliers' level of compliance with our NDPE policy. Its 'Supplier Group Compliance Programme (SGCP) entails a more efficient mapping and monitoring process and helps to strengthen our suppliers' commitments and compliance to our NDPE policy. However, despite having a monitoring compliance system that allows determine degree of compliance, no evidence found of a system to particularly track effectiveness of action plans taken to mitigate human rights issues that it faces. [Grievance Procedure Updated 2019, 06/2019: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Supply Chain Transformation, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process.</li> <li>• Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4.</li> <li>• Not met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Responding to affected stakeholders concerns: A example of how the company has responded to a specific human rights concerns can be read in the document Case Study: Collective Action with CNV &amp; Hukatan-KSBSI Makes Positive Impact in Labour Improvements. [Collective-action-with-cnv-hukatan-ksbsi-makes-positive-impact-in-labour-final, 05/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Ensuring affected stakeholders can access communications: In the context of this case, the Company states that "While we have improved the labour and human rights standard in PT MSS as well as in other operations in Indonesia, we recognise that our work is not yet done. We continue to engage with unions and their federations, such as the Huakatan-KSBSI and CNV, to ensure we stay on track to progress and improve. Earlier in 2018, we opened our doors to CNV to film at PTT MSS and speak to our workers on camera". [Collective-action-with-cnv-hukatan-ksbsi-makes-positive-impact-in-labour-final, 05/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company indicates: 'Our Grievance Procedure is open to all external and internal stakeholders, but is primarily used by external stakeholders for cases related to our suppliers. All our employees, workers, and local communities have separate dedicated site-level remedial mechanisms and resolution processes for any complaints'. [Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company indicates in its Sustainability Report: 'We have increased our reporting capabilities for our new Grievance Procedure. Wilmar continuously target to achieve a 100% response rate for all grievances raised, and are working to resolve all open cases effectively and amicably'. It reports: 59 cases lodged, 90% cases closed (Wilmar own-operations: 2 open; 3 closed; third party suppliers: 4 open; 50 closed), nature of open cases: social conflict and human rights (5*); deforestation and social conflict (1*). This refers to the NDPE policy (no deforestation, no peat, no exploitation policy). [Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages: The Company indicates that 'managing communications, including response letters to Grievance Raisers in the language of the original Grievance' is part of the duties of the Grievance Unit. The grievance mechanism is available in English and in Bahasa. However, it is not clear that it is available in all appropriate languages. Although response to complainant can be in the language of the original Grievance, is not clear whether all the procedure is. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Grievance Procedure Updated 2019, 06/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Opens own system to AG supplier workers: The Company indicates that 'Wilmar's NDPE policy and this updated Grievance Procedure shall apply to our own operations, any refinery, mill or plantation that we own, manage, or invest in, regardless of stake; and all third-party suppliers at a Group-level within our supply chain'. Different grievance channels are disclosed in the Grievance Procedure. [Grievance Procedure Updated 2019, 06/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company indicates: 'Our Grievance Procedure is open to all external and internal stakeholders, but is primarily used by external stakeholders for cases related to our suppliers. All our employees, workers, and local communities have separate dedicated site-level remedial mechanisms and resolution processes for any complaints'. [Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The Company indicates that 'managing communications, including response letters to Grievance Raisers in the language of the original Grievance' is part of the duties of the Grievance Unit. The grievance mechanism is available in English and in Bahasa. However, it is not clear that it is available in all appropriate languages. Although response to complainant can be in the language of the original Grievance, is not clear whether all the procedure is. The Company provided information to CHRB for this indicator, but it was not material. It provided additional comments. However, this document or its content has not been found in publicly available sources. [Grievance Procedure Updated 2019, 06/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: AG supplier communities use global system: As indicated above, the Company indicates: 'Our Grievance Procedure is open to all external and internal stakeholders, but is primarily used by external stakeholders for cases related to our suppliers. All our employees, workers, and local communities have separate dedicated site-level remedial mechanisms and resolution processes for any complaints'. [Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: The Company discloses a number of actions taken in with different issues that workers may face, such as union engagement. In the document Verité Update on Wilmar Programme, the company indicates that 'While we have improved the labour and human rights standard in PT MSS as well as in other operations in Indonesia, we recognise that our work is not yet done. We continue to engage with unions and their federations, such as with Hukatan-KSBSI and CNV, to ensure that we stay on track to progress and improve'. Finally, 'Through our Indonesian Human Resource Department (HRD), we initiated contact with Hukatan-KSBSI and direct engagement between leaders of both parties took place. Shortly after, a new chapter of the union was set-up in PT MSS as the union was re-introduced to workers. Both Wilmar HRD and the union provided support and training for newly elected worker union representatives on industrial relations. All of these took place in the second half of 2017. Wilmar's PT Murini Sam Sam (PT MSS) was one of the estates in the study. The study discussed issues of wages and temporary contracts, informal family work, working conditions, </li></ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>gender and freedom of association. In particular, it highlights the absence of a formal union in PT MSS even though the company at one time had a chapter of the union Hukatan-KSBSI (an Indonesian union affiliated to CNV). (...) Through our Indonesian Human Resource Department (HRD), we initiated contact with Hukatan-KSBSI and direct engagement between leaders of both parties took place. Shortly after, a new chapter of the union was set-up in PT MSS as the union was re-introduced to workers. Both Wilmar HRD and the union provided support and training for newly elected worker union representatives on industrial relations'. [Strengthening Labour Practices, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Collective-action-to-improve-labour-conditions, 15/11/2017: <a href="http://wilmar-international.com">wilmar-international.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: Following up on union issues in Indonesia, the Company reports that 'our strong working relationship with labour unions helps ensure continuous improvement for our workers' quality of life at our oil palm estates. Wilmar's work on converting workers' employment status to permanent ones and providing subsidies and wages would not have been possible without collaboration with the unions. We also recognize that unions serve as effective mechanisms for raising grievances. To date, five collective bargaining agreements have been established in across several locations'. [Sustainability Report 2019, 05/2020: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Evaluation of the channel/mechanism: The report from the Verite-Wilmar programme with respect their work regarding monitoring and improvements in Wilmar's DLI Milano operations, reads: '[...] while there is an articulated grievance mechanism, the process for anonymous reporting is unclear, there are no key performance indicators for effective grievance mechanism and the non-reprisal policy is not linked to the process'. [Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

### Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Headline: Wilmar International accused of displacement of local communities in Nigeria</li> <li>• Area: Land Rights</li> <li>• Story: On 27 August 2018, communities impacted by Wilmar International in the Nigerian Cross River State have taken their case to the Nigerian State House of Assembly. Subsistence farmers in these communities argue that they been displaced and denied access to the land.</li> </ul> <p>The land in question is a palm oil plantation which is being revived by Wilmar after decades of neglect. In the 1950s, the Nigerian government allocated this land as palm oil plantation but in the 1970s it was abandoned and in the following years, subsistence farmers (out of Cross River State) started to work the land. In 2010, 'the government of Cross River State, privatized the Palm Estates through a competitive bidding process. Biase Plantations Limited (BPL), a subsidiary of Wilmar, acquired Ibaie Oil Palm Estate.'</p> <p>Though the Nigerian government reached an agreement with the communities which owned the land before the 1950s plantations, according to the subsistence farmers, they were displaced from their land. In a 2015 report, Friends of the Earth along with other NGOs claimed that 'approximately one-third of the land in these concession areas was farmed by small-holder farmers who depended on the land and perceived themselves to have the right to farm there in perpetuity'. Wilmar in its response claims that BPL 'continues to recognize the customary rights of 'landlord communities'. This is evidenced in the payment and acceptance of traditional rights before commencing our operations, annual royalty payments to the communities and ongoing community investment and engagements'. However, there is no evidence that the company recognises the rights of the subsistence farmers.</p> <p>• Sources: [Friends of the Earth, July 2015: <a href="http://foeeurope.org">foeeurope.org</a>][The Nigerian Guardian, 27/08/2018: <a href="http://guardian.ng">guardian.ng</a>][Land Use Policy, 2014: <a href="http://sciencedirect.com">sciencedirect.com</a>][The Nigerian Guardian, 10/10/2019: <a href="http://guardian.ng">guardian.ng</a>]</p>
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The company provides a response to the allegations of displacement by stating that it did not acquire any new land. [Wilmar's Response to The Guardian Newspaper allegation, 21/12/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Farmland grab Cross River Community Protest, 27/08/2019: <a href="http://farmlandgrab.org">farmlandgrab.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The company's response goes into detail regarding the allegations of displacement stating that it did not 'acquire any land directly from the communities mentioned'. [Wilmar's Response to The Guardian Newspaper allegation, 21/12/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Wilmar's Response to The Guardian Newspaper allegation, 21/12/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: Wilmar International's 2017 Sustainability Report states that "Wilmar will respect the resource (e.g. land, forests and fisheries) and tenure rights of local communities. This is done in cognizance of the national obligations, constitutions, local laws and regulations of the country we are operating in. We diligently strive to ensure that we use land to which we have a legal right, and in which the country's government recognizes us as the rightful entity to manage the land in question." [Sustainability Report 2017, 2017: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Environmental Policy, 01/03/2015: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: Wilmar's Human Rights Policy states that its commitment to respecting local community land rights applies to all Wilmar subsidiaries and associates, including contractors. [Human Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: Wilmar makes a clear statement that it commits to obtaining the Free, Prior and Informed consent from local communities before commencing new operations. [Human Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: In its response to the allegations of violation of land rights, Wilmar International says that its subsidiary, Biase Plantation Limited "did not acquire any land directly from the communities mentioned in Guardian report. Following the transfer of ownership to Biase Plantations Limited (BPL), an MOU endorsed by the government who initially owned the property was signed with specifications of CSR to be provided to the indigenous communities. The land transferred to Biase Plantations Limited has not changed in size or location and is registered in the state registry of land". However, there is no evidence that the company engaged with the subsistence farmers. [Farmland grab Cross River Community Protest, 27/08/2019: <a href="http://farmlandgrab.org">farmlandgrab.org</a> &amp; Wilmar's Response to The Guardian Newspaper allegation, 21/12/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders: The company reached an agreement with the government and some of the 'landlord' communities on CSR but this is not remedy to the subsistence farmers who raised the allegation [Wilmar's Response to The Guardian Newspaper allegation, 21/12/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Has reviewed management systems to prevent recurrence: There is no evidence that the company reviewed its system on how it addresses land rights of groups who do not have a formal title for land but are present on the company's land. [Farmland grab Cross River Community Protest, 27/08/2019: <a href="http://farmlandgrab.org">farmlandgrab.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: Wilmar accused of land grabbing by local community in West Sumatra, Indonesia</li> <li>• Area: Land Rights &amp; FPIC</li> <li>• Story: On April 17, 2017, Wilmar officially submitted an appeal to the February 1, 2017 decision of the Roundtable on Sustainable Palm Oil (RSPO)'s Complaints Panel that would allow the Kapa community of West Sumatra, Indonesia, to retain control of their indigenous territory. The RSPO found that Wilmar International had taken over Kapa lands without their consent.</li> </ul> <p>The Kapa community had filed a complaint with the RSPO in October 2014, stating that PT Permata Hijau Pasaman I (part of Wilmar) had established a plantation in their area in violation of both RSPO standards and Indonesian law. The Kapa also claimed that Wilmar was seeking to get a Land Use Rights (HGU) permit in their</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>territory, a move that if successful would have permanently erased their rights. The HGU effectively rounds off the permitting process for oil palm growers, allowing them to operate for 35 years. However, according to the RSPO's February 2017 decision, Wilmar must respect Kapa land rights and obtain the community's consent before applying for an HGU. In addition, the disputed land must be measured and mapped by an independent expert, and the results of this mapping must be used to renegotiate the community's partnership with Wilmar, by land leasing or profit-sharing, which the RSPO says will allow the community to benefit from the company's presence on their land. Wilmar submitted an appeal to the RSPO, which was subsequently withdrawn. Wilmar then entered into discussions with the Nagari Kapa community to re-negotiate a partnership based on the results of the participatory mapping process and develop an implementation plan. The RSPO subsequently closed the case and handed over monitoring of the implementation plan to the Investigation and Monitoring Unit (IMU).</p> <p>In November 2019, Forest Peoples Programme published a follow-up report claiming widespread human rights violations in Wilmar's palm oil operations in West Sumatra. According to the report, 'communities reported loss of access and control of their customary lands which were taken over by the companies without their consent. Many communities also reported suffering intimidation and criminalisation after raising concerns and complaints with the companies affecting them.'</p> <p>In April 2020, both parties have signed an agreement as a mutual resolution' and the IMU closed the case.</p> <p>According to South east Asia Globe, 'as a part of the agreement, Wilmar agreed to pay the community compensation for its use of their land over the last twenty years. For the next twenty-plus years, the remaining time on Wilmar's current contract in the area with the Indonesian government' Wilmar will pay monthly payment for the use of land.</p> <p>According to the article, 'when the license period is over, both Wilmar and local government officials have reportedly agreed to support the Nagari Kapa community if they decide they want the contested areas back in full'. Though this dispute has been settled, according to the news article and Peoples Forest Programme, "There are many other communities that I know of in West Sumatra who haven't had their rights recognised and that are still being intimidated by Wilmar."</p> <p>• Sources: [BHRR: <a href="https://business-humanrights.org">business-humanrights.org</a>] [Wilmar - 26/04/2017: <a href="https://ir-media.wilmar-international.com">ir-media.wilmar-international.com</a>] [Roundtable on Sustainable Palm Oil - 26/09/2018: <a href="https://askrspo.force.com">askrspo.force.com</a>] [South East Asia Globe - 20/06/2020: <a href="https://southeastasiaglobe.com">southeastasiaglobe.com</a>]</p>
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The company provides a response to the decision by the RSPO, additionally it has provided a number of statements on the issue which has been ongoing. [Wilmar appeal (Kapa community), 07/07/2018: <a href="https://ir-media.wilmar-international.com">ir-media.wilmar-international.com</a> &amp; Mongabay (Kapa community) article, 17/05/2017: <a href="https://news.mongabay.com">news.mongabay.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The company's response goes into detail. In Wilmar's statement regarding the RSPO's original decision, the company says it felt compelled to lodge a formal appeal after identifying a number of "oversights" in the handling of the case. These related to the RSPO Complaints Panel's decision being based on preliminary information, the change of the independent consultant's role without due notification to and consensus of all parties concerned, and finally Wilmar's evidence and informants not being included in development of the final report. However the company subsequently withdrew this appeal in November. It also responded in November 2019 to FPP interim report in detail [RSPO decision (Kapa community), 09/2018: <a href="https://askrspo.force.com">askrspo.force.com</a> &amp; response to FPP interim report, 5/11/19: <a href="https://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The company's Human Rights policy defines Indigenous and Community Rights: a) Respect Land Tenure; b) Commit to obtaining Free, Prior and Informed consent from local communities before commencing new operations; c) Commit to open, transparent fair and equitable conflict resolution. Additionally in its 'No Deforestation, No Peat, No Exploitation Policy' the company commits to No Exploitation of People and Local Communities, re-iterating the commitments made in the human rights policy.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[Human Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Policies apply to the type of business relationships involved: The company says its Human Rights policy applies to all Wilmar subsidiaries associates, including suppliers and contractors. As at PT Permata Hijau Pasama is a part of Wilmar International these policies apply. [Human Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The company in its Human Rights policy commits to respecting FPIC. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Human Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
E(2).3	The Company has taken appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: Wilmar has engaged with the affected stakeholders of the Kapa community through participation in the RSPOs Complaints panel process. In the RSPO's summary of the complaint, it notes that "RSPO has facilitated Wilmar, FPP and Nagari Kapak to have meeting on 19th November 2014 in Kuala Lumpur. Parties agreed to bring their issues to BPN and Head of District of Pasaman Barat". Additionally there has been a number of other subsequent meetings between the parties. In Wilmar's 2018 Sustainability report the company notes that "A participatory mapping process was carried out through consultation with Nagari Kapa and local government bodies followed up with an implementation plan". [Mongabay (Kapa community) article, 17/05/2017: <a href="http://news.mongabay.com">news.mongabay.com</a> &amp; 2018 Sustainability Report, 2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Encourages linked business to engage affected stakeholders: The company has encouraged its linked business PT Permata Hijau Pasaman (a subsidiary of Wilmar International) to engage with affected stakeholders through the RSPOs roundtable conference. [RSPO decision (Kapa community), 09/2018: <a href="http://askrspo.force.com">askrspo.force.com</a> &amp; Mongabay (Kapa community) article, 17/05/2017: <a href="http://news.mongabay.com">news.mongabay.com</a>]</li> <li>• Met: Provides remedies to affected stakeholders: In a timeline of the complaint provided by the RSPO it notes that both parties agreed to proceed with an implementation plan and the case was subsequently transferred to the Investigation and Monitoring Unit on 26 September 2018. In April 2020, the IMU closed the case following the parties signing an agreement. [RSPO decision (Kapa community), 09/2018: <a href="http://askrspo.force.com">askrspo.force.com</a> &amp; Forest Peoples response (Kapa community), 04/12/2018: <a href="http://forestpeoples.org">forestpeoples.org</a>]</li> <li>• Met: Has reviewed management systems to prevent recurrence: In the company's response to FPP's interim report in November 2019, they disclose that conducted an 'evaluation of issues raised against Wilmar's internal systems on social grievance and resolution'. They also say that 'We have begun working on implementing the recommendations' [2018 Sustainability Report, 2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; response to FPP interim report, 5/11/19: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Remedies are satisfactory to the victims: As the community and the company reached an agreement, this is considered satisfactory [Forest Peoples response (Kapa community), 04/12/2018: <a href="http://forestpeoples.org">forestpeoples.org</a> &amp; RSPO decision (Kapa community), 09/2018: <a href="http://askrspo.force.com">askrspo.force.com</a>]</li> <li>• Met: Has improved systems and engaged affected stakeholders: The company has engaged with the Nagari Kapa community to resolve the complaint lodged to the RSPO, noting in its 2018 Sustainability Report that a participatory mapping process was carried out through consultation with Nagari Kapa and local government bodies followed up with an implementation plan". In the company's response to FPP's interim report in November 2019, they disclose that conducted an 'evaluation of issues raised against Wilmar's internal systems on social grievance and resolution'. They also say that 'We have begun working on implementing the recommendations' [response to FPP interim report, 5/11/19: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; 2018 Sustainability Report, 2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Headline: Wilmar accused of intimidation and attempts to cover up labour abuses from child and forced labour in palm oil production in Indonesia</li> <li>• Area: Child labour, FoA &amp; CB</li> <li>• Story: In November 2016, Amnesty International published a report that reveals a range of human rights abuses in palm oil production by Wilmar who is providing</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the oil to nine global firms: AFAMSA, ADM, Colgate-Palmolive, Elevance, Kellogg's, Nestlé, Procter &amp; Gamble, Reckitt Benckiser and Unilever. The alleged human rights violation includes the use of child labour and denial of freedom of association and collective bargaining. Responding to the situation, the Company made a commitment to investigate the findings of the report and announced that it would hire a consultancy for this purpose.</p> <p>However, Amnesty International has published an article in March 2017 claiming that it found no convincing evidence that Wilmar has addressed the issues. In addition, the organisation alleged that Wilmar has tried to intimidate staff into denying the claims.</p> <p>According to the article, in a meeting with trade union representatives in January 2017, Wilmar asked workers to sign a document which stated that the abuses outlined in Amnesty International's report were not taking place on their plantations. Wilmar reportedly resorted to such tactics following a media report that the Indonesian government would carry out a thorough investigation into the issues highlighted in the report.</p> <p>• Sources: [Thomson Reuters Foundation News, 7/3/2017: <a href="https://www.reuters.com">reuters.com</a>][Amnesty International, 7/3/2017: <a href="https://www.amnesty.org">amnesty.org</a>][Amnesty International, 30/11/2016: <a href="https://www.amnesty.org">amnesty.org</a>]</p>
E(3).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The company stated 'actively discussing' the issues raised in the Amnesty International report but rejected the claim that workers had been asked to sign a document denying the investigation findings of Amnesty International in an attempt to discredit the report, and said the union representatives had "voluntarily" signed the letters as "a show of support" . [Wilmar letter to Amnesty International, 16/01/2017: <a href="https://www.wilmar-international.com">wilmar-international.com</a> &amp; Amnesty International article, 07/03/2017: <a href="https://www.amnesty.org">amnesty.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: In the letter to Amnesty International, Perpetua George, Wilmar's Assistant Manager for Group Sustainability, says that "the company did receive letters signed by 2 of our union representatives, one from Serikat Pekada Seluruh Indonesia (SPSI) PT Milano chapter, and one from Serikat Pekerja Serikat Perkebunan Indonesia (SERBUNDO), Merbau Estate chapter. These letters were intended as a show of support to Wilmar, and were voluntarily offered and signed. Wilmar management did not ask for the letters". Additionally the letter goes onto explain the steps that have been taken after the release of the report, including the initiation of an internal investigation by the sustainability team and requests that the 3 suppliers implicated in the Amnesty report are subject to external assessments. [Wilmar letter to Amnesty International, 16/01/2017: <a href="https://www.wilmar-international.com">wilmar-international.com</a>]</li> </ul>
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company commits to prohibit child labour and also respects the right to Freedom of Association and Collective Bargaining, stating in its 2018 Sustainability report "Wilmar respects the right of all employees to form and join trade unions and to bargain collectively. Unions are our key stakeholders in ensuring that we understand and appropriately address the concerns and grievances of our employees". [Child Protection Policy, 01/2018: <a href="https://www.wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2017, 2017: <a href="https://www.wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The policies applies to the Company's business partners. [Child Protection Policy, 01/2018: <a href="https://www.wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2017, 2017: <a href="https://www.wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The company has a specific child protection policy which details a range of measures including the documentation of relevant employees ages and making such information open to verification by a relevant statutory body, as well as take remedial action should child labour be uncovered to ensure the protection of the child's best interests and welfare. Regarding unions, the Company indicates: 'Wilmar respects collective bargaining, and the right of all employees to form and join trade unions. In the absence of a proper collective agreement or association, workers are free to join any other unions. [...] We also recognise that unions serve as effective mechanisms for raising grievances. To date, five collective bargaining agreements (CBAs)</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			(Perjanjian Kerja Bersama) have been established in across several locations. These have been formed in partnership with Serbundo and HUKATAN-Konfederasi Serikat Buruh Sejahtera Indonesia (KSBSI). The agreements in West Sumatra and West Kalimantan cover multiple Wilmar sites.' The Company's human rights framework, for the policy statement of freedom of association (and collective bargaining) states that approach includes 'no interference policy and ensuring independence from labour unions'. [Child Protection Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> & Code of Conduct, 01/09/2017]
E(3).3	The Company has taken appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Denies allegations, but has engaged affected stakeholders: In its 2017 Sustainability Report, Wilmar International says it conducted a visit in December 2016 to assess labour practices at PT ABM. This initial engagement led to the Support For Transformation (SFT) project. The SFT project involved a six to 12-month process of on-site engagement to ensure a mutual understanding of the project objectives and establish ownership of the process. According to Earthworm Foundation, TFT visited PT. ABM over three separate visits in 2017 to undertake workers' consultations, build the capacity of management to improve practices and verify changes on the ground. [Sustainability Report 2017, 2017: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Amnesty International article, 07/03/2017: <a href="http://amnesty.org">amnesty.org</a>]</li> <li>• Met: Denies allegations, but reviewed systems to prevent such impacts: In a statement in April 2017, Wilmar International announced that it was collaborating with Verite, a fair labour non-profit organisation, to implement a 5 phase process focused on key labour risks within the organisations operations. The company has since released a report in 2018, explaining how it reviewed its management systems which focused on preventing child labour and forced labour, and the steps that it would take to prevent such instances occurring in the future. [Wilmar and Verite confront systemic labour issues in the Indonesian palm oil industry, 06/04/2017: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Denies allegations, but implements review recommendations: Following the 12 month review conducted by Verite, a report released in November 2018 by Verite outlines the steps that have been taken by two of Wilmar International's subsidiaries (PT DLI and PT Milano). These include crafting a program to move from paying a minimum wage to a living wage, improve quality of surveillance patrols in high risk areas for child presence, and redesigning incentive schemes so they don't encourage the use of child labour, improving pay practices and making the pay system understandable to workers among other steps. [Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Strengthening Labour Practices Nov_2018, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Denies allegations, and ensures systems prevent such impacts: Wilmar released a Progress Report in November 2018, explaining the steps that had been taken to improve weaknesses in relation to child labour, forced labour and wage structures. These changes included Abolishment of "Kontanan" work, and introduction of a formal policy on overtime work on official rest days. Standardised worker payslip format across Indonesia in Bahasa Indonesia, to facilitate easier interpretation and understanding of pay components and calculation. Working with unions to provide clarification of the link between KPI and wages, as set out in the Collective Bargaining Agreement (CBA), also known as Perjanjian Kerja Bersama, which is negotiated between worker/union representatives and the management. They also said they reduced the number of temporary workers in Northern Sumatra by converting temporary contract workers to permanent contract workers. They have also developed a child safety assessment which has been shared with plantation operations management. Additionally they have continued trade union engagement with the Christian Trade Unions (CNV) of the Netherlands and Hukatan-KSBSI, which is an Indonesian union affiliated to CNV, as well as Serbundo. [Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Strengthening Labour Practices Nov_2018, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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