

**Company Name** Wilmar International  
**Industry** Agricultural Products (Supply Chain and Own Operations)  
**Overall Score (\*)** 45.0 out of 100

Theme Score	Out of	For Theme
4.9	10	A. Governance and Policies
8.8	25	B. Embedding Respect and Human Rights Due Diligence
6.7	15	C. Remedies and Grievance Mechanisms
6.0	20	D. Performance: Company Human Rights Practices
14.2	20	E. Performance: Responses to Serious Allegations
4.4	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2019 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

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

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://www.amazonaws.com">s3-us-west-2.amazonaws.com</a> &amp; Wilmar International Limited _ UN Global Compact, 07/08/19: <a href="https://www.unglobalcompact.org">unglobalcompact.org</a>]</li> <li>Met: UDHR: The company states that "adheres to international human rights principles and complies with local applicable laws, drawing guidance from (...) The United Nations (UN) Universal Declaration of Human Rights. In the NDPE Policy, the company remarks its "respect and support the Universal Declaration of Human Rights". [Human Rights Policy, 01/2018: <a href="https://www.wilmar-international.com">wilmar-international.com</a> &amp; No Deforestation, No peat No exploitation Policy, 05/12/13: <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: 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 2018 uses different terms. [Sustainability Report 2017, 2017: <a href="https://www.wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> <li>Not met: OECD</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://www.amazonaws.com">s3-us-west-2.amazonaws.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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 assessed in this datapoint. With respect freedom of association and collective bargaining, the Company states: 'These rights include those 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 are made available for all such personnel.'</li> <li>The provisions of the policy apply to "all third-party suppliers from whom we purchase or with whom we have a trading relationship". [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> <li>Score 2</li> <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="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> <li>• Met: Respect H&amp;S of workers: The company is committed to respect the health and safety of its workers. [Safety and Health Policy, 20/12/2013: <a href="http://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="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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: Respect land ownership and natural resources: The company claims to 'respect land tenure rights'. [Human Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Respecting the right to water: The company indicates that 'free access to a reliable source of potable water is an important right, including for our workers. Wilmar ensures that ample amounts of potable water are provided to all workers. This evidenced in work records. Where water sources are deemed to be insufficient to meet the needs of our workers, additional water depots will be built. In North Sumatra, two water depots are available at PT Daya Labuhan Indah, while water sources are sufficient in PT Milano Sei Daun (185 M3 /day) and PT Milano Merbau (66 M3 / day). Additional water depots are being built in other estates in North Sumatra, to supplement existing water sources'. However, no commitment to respecting the right to safe access to water (not only for workers, but not compromising access to safe water for local communities). [Making-progress-on-no-exploitation-commitments-ongoing-work-within-wilmar-operations-and-suppliers-1, 08/2016: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Expecting suppliers to respect these rights: The company claims to "respect land tenure rights". The same is expected from suppliers. [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: FPIC for all: The company states that 'Free, Prior and Informed Consent (FPIC) to operations on lands to which they hold legal, communal or customary rights' is part of their policy. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights: In the No-deforestation, No peat, No-exploitation policy, the company states that "Free, Prior and Informed Consent (FPIC) to operations on lands to which they hold legal, communal or customary rights" is part of their policy. It is also expected from their suppliers. No evidence found, however, in relation to respect right to water. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry –	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: Women's rights: The company indicates that it 'is committed to providing the best possible means of support for women, whether they are our employees, or live in housing estates in our operations'. Also, ' Wilmar is committed to the principle of equal opportunity for each employee. In line with our Equal Opportunity Policy, we do not discriminate based on (...), gender, (...), sexual</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	people's rights (AG)		<p>orientation(...) when making decisions on hiring, promotion or retirement. (...) We seek to ensure that pay and conditions are equal for men and women'. However, no publicly available statement of policy committing it to respecting women's rights found. No further information found in the Equal Opportunity Policy. [Women's Charter, 01/05/2019: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</p> <ul style="list-style-type: none"> <li>• Met: Children's rights: The company commits to protect Children's Rights. [Child Protection Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Migrant worker's rights: The company commits to 'respect and Recognize the Rights of All Workers including Contract, Temporary and Migrant Workers'. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Expects suppliers to respect these rights: In the No-deforestation, No peat, No-exploitation document, page 5, the company commits to 'respect and Recognize the Rights of All Workers including Contract, Temporary and Migrant Workers'. [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>• Not met: CEDAW/Women's Empowerment Principles: The company indicates that 'In January 2018 Oxfam, Serikat Buruh Perkebunan Indonesia (Serbundo) and Kapal Perempuan conducted onsite research in PT. DLI focusing on the working conditions of women employees and their reproductive rights in oil palm plantations'. However, no publicly available statement of policy committing it to respecting women's rights refers to the relevant part(s) of the Convention on the Elimination of Discrimination Against Women or of the Women's Empowerment Principles found. [Sustainability Report 2018, 2019]</li> <li>• Not met: Child Rights Convention/Business Principles: The company indicates that 'We launched our Child Protection Policy (CPP) in November 2017. The CPP supersedes our longstanding No Child Labour Policy, and is formulated to address issues of children's rights and welfare in a more holistic way. It specifically enjoins us to ensure that all children in our plantations, schools and facilities, as well as those under the care of our third-party suppliers and contractors, are provided with safeguards and protection from abuse and exploitation. The CPP is guided by global standards, including ILO and UNICEF, and includes remediation actions for instances where child labour has occurred'. Also, Wilmar's Child Protection Policy is based on the principles of the UN Convention on the Rights of the Child'. However, the use of the wording 'based on' does not qualify as a formal commitment to the initiative following CHRB Criteria. No publicly available statement found which commits it to respecting children's rights refers to the relevant part(s) of the Convention on the Rights of the Child or of the Children's Rights and Business Principles. [Sustainability Report 2018, 2019 &amp; Child Protection Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Convention on migrant workers: The company indicates that 'Wilmar is a member of the RSPO Human Rights Working Group (HRWG), which was established in 2014 and is now a part of the RSPO structure. The work of the HRWG is directly linked to the globally accepted UN Guidelines on Business and Human rights (the "Ruggie Framework"). Wilmar is actively participating in the HRWG Labour Taskforce, addressing the rights of plantation workers and vulnerable groups such as migrant workers and casual workers, as well as issues including the promotion of living wages, health and safety conditions at plantations and freedom of association'. However, no publicly available statement found of a policy committing it to respecting migrant workers' rights refers to the relevant part(s) of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. No further information found in the Sustainability Report 2018. [Sustainability Report 2017, 2017: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> <li>• Not met: Expecting suppliers to respect these rights: The scope of Wilmar's NDPE policy, Human Rights Policy, Child Protection Policy, applies to all Wilmar operations worldwide and all third-party suppliers. However, none of the following commitments was found in any of these policies: Convention on the Elimination of Discrimination Against Women or of the Women's Empowerment Principles, Convention on the Rights of the Child or of the Children's Rights and Business Principles, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, neither for the company's own operations nor for its suppliers. [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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to engage with stakeholders	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 stakeholder engagement: The company indicate that "Wilmar commits to actively and constructively engaging with all stakeholders, including communities, governments, customers and civil society at the local, national and international levels. This includes a commitment to make information regarding the impacts of its operations publicly available." [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: Commits to engage stakeholders in design: The Company indicates that "Wilmar values stakeholder input, and will reach out to local and international NGOs, communities, governments, workers, experts and other relevant stakeholders to assist with implementation. We will seek and welcome their input and intelligence on supplier performance and review; and will quickly investigate and act upon stakeholder identification of policy violations. We will work with governments, companies, communities, NGOs and other stakeholders to support adoption of government policies that facilitate a rapid shift to an industry free of deforestation and exploitation". [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
A.1.5	Commitment to remedy	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: Commits to remedy: It is part of the company's policy 'access to remedy - the company and its suppliers/sub-contractors shall ensure workers have access to judicial remedy and to credible grievance mechanisms, without fear of recrimination or dismissal'. Moreover, 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'. However, we found no evidence of a commitment to provide remedy. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; 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</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The company indicates that 'Wilmar maintains a clear and strong commitment to non-violence and will do whatever possible, in all contexts, to prevent the use of force or the threat or real application of violence'. Also, 'Wilmar is an active member of the RSPO Human Rights Working Group, specifically the Labour Taskforce, which addresses the rights of plantation workers and vulnerable groups. (...). We have also contributed to the development of the RSPO Policy on Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons, which was adopted by the RSPO Board of Governors in September 2018'. However, no publicly available statement found of a policy committing it to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders in relation to its operations. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: The human rights policy is signed by the Chairman and Chief Executive officer. [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: Board level responsibility for HRs: The company indicates that 'our Chairman and CEO oversees the implementation of our No Deforestation, No Peat and No Exploitation (NDPE) policy, and is supported by the Risk Management Committee, which reviews sustainability reports and emerging issues on a quarterly basis'. [Sustainability Report 2018, 2019]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Speeches/letters by Board members or CEO: In the introduction for the Sustainability Report 2018, part of the statement from the board includes: 'Wilmar's operations are guided by a commitment to human rights. We work proactively to prevent the exploitation of workers and communities, and seek to immediately halt and remediate any infringement of our policies. Over the past two years, we have placed a great deal of our focus on strengthening worker rights in our plantations and mills. In Indonesia, we achieved an important milestone by converting the contracts of all our temporary workers' in Central Kalimantan to permanent positions. Securing stronger labour union relations across our Indonesian operations has also been a key focus as we continue to build on a collaborative approach to workers' rights. The UN Sustainable Development Goals guide our efforts relating to child welfare and protection. In 2018, we undertook a range of initiatives to identify risks for children in and around our estates. We have also escalated our work to ensure that the 12,400 children living in our plantations in both Asia and Africa have access to decent primary schooling. Currently, about 84% of these children now attend school, and our objective is to ensure that we reach 100% attendance by 2025. These efforts have been strongly supported throughout the company, and we are therefore proud to be ranked number one in the Global Child Forum 2018 Corporate Responses to Protecting Children's Rights in Southeast Asia report for the improvements we have made'. [Sustainability Report 2018, 2019]</li> </ul>
A.2.2	Board discussions	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: Board/Committee review of salient HRs: The company indicates that it is part of the Board's duties and responsibilities to 'consider sustainability issues, in particular environmental, social and governance factors, in the formulation of the business strategies and corporate policies of the Group'. Moreover, 'Our Chairman and CEO oversees the implementation of our No Deforestation, No Peat and No Exploitation (NDPE) policy, and is supported by the Risk Management Committee, which reviews sustainability reports and emerging issues on a quarterly basis'. However, no mention found about human rights specifically. [Sustainability Report 2018, 2019 &amp; Annual Report 2018, 2019: <a href="http://wilmar-iframe.todayir.com">wilmar-iframe.todayir.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	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: Incentives for at least one board member</li> <li>Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	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: Commits to ILO core conventions: See indicator A.1.2</li> <li>Met: Senior responsibility for HR: The Company indicates that 'Our Chairman and CEO oversees the implementation of our No Deforestation, No Peat and No Exploitation (NDPE) policy'. Respect and support the Universal Declaration of Human Rights is included in this policy. Also, 'Wilmar's Chief Sustainability Officer (CSO) spearheads the Group's overall sustainability agenda (which includes human rights), while the Group Sustainability General Manager (GM) is responsible for the implementation of these strategies and policies throughout our supply chain, as well as reviewing the progress of execution'. [Sustainability Report 2018, 2019]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Company indicates that ' Wilmar's Sustainability Department is responsible for the implementation of the Group's sustainability strategies. Its mandate covers the NDPE policy, the principles of the United Nations Global Compact, certifications, stakeholder engagement, corporate governance and reporting. The department is staffed by more than 60 employees worldwide, combining a wide range of relevant local and technical expertise across South East Asia, Europe and Africa.(...) The implementation of our NDPE policy is supported by site- and regional-level operation teams, a communications team, and a Technical Advisory Group comprising NGOs and other sustainability partners. These teams provide input to the Joint Steering Committee, which oversees important strategic issues relating to the implementation of the NDPE policy and evaluates progress against policy targets'. [Sustainability Report 2018, 2019]</li> <li>• Not met: Day-to-day responsibility for AG in supply chain: The Company has 'established local teams in Malaysia and Indonesia to provide on-the-ground support for our third-party suppliers. For suppliers who fail to comply with our NDPE policy, a Suspension Committee has been set up to review trading relationships. In addition to this formal governance structure, we have made strategic agreements with various implementation partners to support our ongoing NDPE policy implementation and supply chain compliance work. These partners include Aidenvironment, TFT (now known as Earthworm Foundation), Proforest and Daemeter of the Consortium of Resource Experts (CORE) , Bus business for Social Responsibility (BSR) and Verité Southeast Asia'. However, no details found on how day-to-day responsibility is allocated across the range of relevant functions within the Company. Current evidence seems to refer to local teams in Malaysia and Indonesia alone, and focuses in external collaborations. [Sustainability Report 2018, 2019]</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights: The company indicates that 'at an operational level, Wilmar's Technical Managers are assessed against the Environment, Health &amp; Safety (EHS) performance of the respective operations under their charge. In addition, a site-level KPI scorecard for EHS has been introduced for factory managers'. CHR is looking for an incentive or a performance management scheme for at least one senior manager on human rights issues. No further information found. [Annual Report 2018, 2019: <a href="http://wilmar-iframe.todayir.com">wilmar-iframe.todayir.com</a> &amp; Sustainability Report 2018, 2019]</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The company affirms that it adopts "the Aggregator Refinery Transformation (ART) approach to improve supplier compliance to our NDPE Policy and as part of risk management". Sustainability, including human rights risks, is part of the duties of the Boards' Risk management Committee. [Sustainability Report 2017, 2017: <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: Audit Ctte or independent risk assessment: The Company indicates that 'Collaborations with international organisations specialising in labour rights remains a mainstay in our efforts in strengthening our labour practices, as it enables us to learn from and integrate best practices into our internal operations. We have also embarked on multi-stakeholder partnerships to allow us to take collective action on labour issues that remain entrenched in the existing culture of the palm oil industry in Indonesia'. However, it is not in the context of a global enterprise risk management systems and assessing its adequacy in managing human rights risks. [Strengthening Labour Practices, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communicates its policy to all workers in own operations: The company indicates that 'in 2018, we updated our Whistleblowing Policy to ensure a robust process for the independent investigation of alleged improprieties as well as follow-up actions. Whistleblowers are guaranteed confidentiality and freedom from reprisals, in good faith and without malice. The Policy has been communicated to employees and is made available on the Group's'. Also, 'In addition to the Whistleblowing Policy, the Company has in place other compliance-</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>related policies including Code of Conduct, Code of Ethics and Anti-Fraud Policy, which set out the principles and standards of behaviour that are expected of employees of the Group when dealing with customers, suppliers, other business associates and colleagues as well as how the Company deals with fraud incidents. These policies have also been communicated to employees of the Group and are also available on the Company's website'. However, the Company's human rights policies are not available in any of the above quoted documents. [Sustainability Report 2018, 2019 &amp; Annual Report 2018, 2019: <a href="http://wilmar-iframe.todayir.com">wilmar-iframe.todayir.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder: The company indicates that 'in January 2015, we established an online Sustainability Dashboard that can be accessed on our corporate website. The Dashboard ensures that we are responsive to our stakeholders' concerns, and is regularly updated with the latest information on grievances, traceability, certifications, policies and statements. We redesigned the Sustainability Dashboard in November 2018 to provide a better user experience'. The company's Human Rights policy can be found through this webpage. However, no evidence found of active policy communication to affected stakeholders including local communities [Sustainability Report 2018, 2019]</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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>• Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Not met: Communicating policy down the whole AG supply chain: The company indicates that 'In addition to the Whistleblowing Policy, the Company has in place other compliance-related policies including Code of Conduct, Code of Ethics and Anti-Fraud Policy, which set out the principles and standards of behaviour that are expected of employees of the Group when dealing with customers, suppliers, other business associates and colleagues as well as how the Company deals with fraud incidents. These policies have also been communicated to employees of the Group and are also available on the Company's website'. Moreover, 'The human rights and labour provisions of the Bonsucro Production Standard have been socialised throughout our sugar operations to eliminate the risk of forced or compulsory labour'. Also, the company's Human Rights Policy applies to all Wilmar subsidiaries and associates, including suppliers and contractors. However, it is not clear whether the company actively communicates its human rights policy commitments down its supply chain, or requires its suppliers to do so. [Sustainability Report 2018, 2019 &amp; Annual Report 2018, 2019: <a href="http://wilmar-iframe.todayir.com">wilmar-iframe.todayir.com</a>]</li> <li>• Not met: Requiring AG suppliers to communicate policy down the chain: See above. [Sustainability Report 2018, 2019 &amp; Annual Report 2018, 2019: <a href="http://wilmar-iframe.todayir.com">wilmar-iframe.todayir.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual: The No-deforestation, No peat, No-exploitation Policy indicates that all the suppliers should respect human rights, however, no evidence of it reflected within contractual or other binding arrangements was found. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Including on AG suppliers: The No-deforestation, No peat, No-exploitation Policy indicates that all the suppliers should respect human rights, no evidence of it reflected within contractual or other binding arrangements was found. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
B.1.5	Training on Human Rights	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>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The Company indicates that 'Commencing in November 2017, BSR will conduct a series of supplier workshops in the major palm oil producing regions in Sumatra and Kalimantan. Tailored for the medium and small suppliers, the workshops are designed to heighten awareness on wages, employment contract status and grievance mechanisms. Representatives from the government and union organizations are also involved so that key actors in the supply chain have a voice in this initiative'. However, CHRB is looking for evidence that all its workers are trained on its human rights policy commitment. No further evidence found. [Wilmar Supplier Workshops 2018, N/A: <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>]</li> <li>• Not met: Trains relevant AG managers including procurement: The Company indicates that 'Wilmar began collaborating with Verité in 2017 with an aim to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>develop robust and sustainable solutions to labour issues in our operations and the wider palm industry. We subsequently underwent a 12-month programme, aligned with international standards and global market demands. Since then, we have been working with Verité to raise awareness on human rights and labour issues in plantations, specifically in the Indonesian context. We have set up systematic sustainability goals and have developed a strategy to change mindsets and entrench sustainability as the priority approach for our company. In January and August 2018, two workshops were organised with the key managerial and operations staff at PT. Daya Labuhan Indah (DLI) and PT. Perkebunan Milano (Milano). As a result of these workshops, the following priorities were identified for mitigating the risk of recurring serious labour issues: Exploring the possible root causes of child labour; Understanding the link between work and pay practices; and Screening for emergent labour issues'. However, it is not clear that relevant managers and workers, including at least procurement, are trained in the human rights policies.. [Sustainability Report 2018, 2019 &amp; Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: The Company describes its monitoring process. It outlines, in the document Sustainability Supplier Monitoring, the Internal Operation Verification Programmes: 'For Wilmar's own mills, our internal compliance team conducts an annual internal audit to assess compliance of our operations against a multitude of sustainability-related requirements. This is a checklist that assesses certification compliance which also includes NDPE Elements. For our mills that are already RSPO, ISPO, or MSPO certified, the internal compliance assessments are done in preparation for external audits'. The Company indicates that '100% of 44 Wilmar-own mills are assessed against our NDPE Policy'. Finally, in its Supplier Group Compliance, it is indicated that 'as part of our verification framework for supplier compliance, in addition to the ART approach at refinery level, the Supplier Reporting Tool, and Grievance Procedure, Wilmar has also been implementing the Supplier Group Compliance (SGC) verification programme since December 2013, to proactively monitor risk of association at supplier group level'. [Sustainability Supplier Monitoring Programme, 08/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Proactive Supplier Monitoring: SupplierGroup NDPE compliance, 08/03/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Monitoring AG suppliers: The company describes its monitoring process, in accordance with its No-deforestation, No peat, No-exploitation Policy in the document Proactive Supplier Monitoring: Supplier Group NDPE compliance. There are three different monitoring tools, including the ART Programme (risk screening of supplying mills, and verification assessment of approximately 10% of total supplying mills selected from highest to medium risk mills), the Supplier reporting tool, in particular for suppliers assessed to be of lower risk. It is an online self-reporting system that enables suppliers to report their current compliance to Wilmar's NDPE policy. Finally, there is also the 'Supplier Group Compliance (SGC) verification programme'. It conducts pro-active monitoring that provides geo-spatial information via regular satellite updates of areas at risk which include: Suppliers supplying directly to Wilmar, and from associated operations where it does not directly buy suspended suppliers' operations and non-supplier companies deemed at risk. [Proactive Supplier Monitoring: SupplierGroup NDPE compliance, 08/03/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Met: Example of corrective action: In the 'Reaffirm Commitment to human rights' document, the company describes and example of correction action taken by the company after some social conflicts have taken place with one of its suppliers. [Reaffirm Commitment to human rights, 15/06/2016: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Understanding Workers Rights in Supply Chain, 12/2016: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Discloses % of AG supply chain monitored: The company indicates that 'Wilmar has an existing Aggregator Refinery Transformations (ART) programme, which has been implemented with The Forest Trust (TFT) since 2014. The ART programme assesses NDPE compliance at refinery level, and currently covers over 83% of our direct mill suppliers (out of 950 mill suppliers with our direct supply chain)'. [Letter to Greenpeace, 09/08/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging business relationships	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>• Not met: HR affects AG selection of suppliers: The Company indicates that 'the provision of group-level maps has been a condition of trade for all new suppliers since May 2018. Such maps allow comprehensive monitoring of potential NDPE non-compliances. potential NDPE non-compliances. Under the SGCP, we are supporting the development of a Supplier Group Mapping Platform, which will contain comprehensive data, including group-level links, names of subsidiary companies, mill capacities, available landbanks, as well as written or public commitments to our NDPE policy. Combined with detailed forest cover and peatland baseline maps, and supported by high-resolution satellite imagery, the mapping database will enable us to monitor any land development activities undertaken by our suppliers'. However, it is not clear that Human Rights aspects/the NDPE policy compliance assessment is a pre-requisite to begin business relationships. [Sustainability Report 2018, 2019]</li> <li>• Met: HR affects on-going AG supplier relationships: In its No Deforestation, No Peat, No Exploitation Policy, the Company indicates that 'Wilmar will cease to do business with any suppliers who our independent advisors or other stakeholders find are in serious violation of this policy, and who do not take immediate remedial action to correct those violations. However, regardless of remedial action, we will not do business with serious repeat violators of the policy. [...] Wilmar reserves the right to disengage from any supplier based on their performance against this Guidance'. Moreover, 'as of 31 January 2019, 17 suppliers at a group level have been suspended, resulting in more than 1.0 million MT loss of supply to our operation. Out of the 1.0 million MT of volume loss, only around 10% comes from our direct suppliers while the remainder was due to issues occurring outside our supply chain'. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Supplier Group Compliance (SGC), 09/08/19: <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 requirement under score 1 met</li> <li>• Met: Working with AG suppliers to improve performance: The Company indicates that, 'commencing in November 2017, BSR will conduct a series of supplier workshops in the major palm oil producing regions in Sumatra and Kalimantan. Tailored for the medium and small suppliers, the workshops are designed to heighten awareness on wages, employment contract status and grievance mechanisms. Representatives from the government and union organizations are also involved so that key actors in the supply chain have a voice in this initiative'. The document contains details of the specific workshops carried out, including topics discussed and speakers. [Collective-action-to-improve-labour-conditions, 15/11/2017: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Wilmar Supplier Workshops 2018, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: The company indicates that 'During the course of our policy implementation process, we realised that the scope of the challenges extends beyond the palm oil industry: they need to be addressed holistically through the collaborative effort of governments, civil society organisations, smallholders, suppliers and industry players. We therefore invest significant resources to support multi stakeholder partnerships and jurisdictional and landscape approaches as part of our sustainability strategies. Moreover, it states that 'Wilmar advocates constructive engagement and collaboration with all its stakeholders. We firmly believe this is an efficient and progressive means of improving our own business and moving the industry as a whole towards becoming more sustainable and responsible. (...) In the spirit of continuous improvement, Wilmar welcomes all stakeholders, including the NGO community, to guide, support and work with us as we identify and resolve gaps and improve the way we operate from a sustainability aspect'. Moreover, in its Sustainability Report 2017, the company indicates that 'We have strengthened labour practices in our upstream palm oil operations over the past year. (...). Though the road to improvement has been challenging, we have made meaningful progress with the support of a variety of stakeholders, especially our employees. We conducted internal reviews while regular assessments were undertaken by external parties, including the ISCC, RSPO, BSR and Verité Southeast Asia. To complement the Progress Report, we also held two stakeholder engagement events with our partners, Verité and TFT, to socialise our progress updates with our key customers and bankers and respond to their concerns'. The Company provides additional evidence of engagement with affected stakeholders (and or its representatives).</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, it is not clear the system through which the company has identified affected and potentially affected stakeholders. [Sustainability Report 2017, 2017: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</p> <ul style="list-style-type: none"> <li>• Not met: Frequency and triggers for engagement: The company indicates that 'On 13 June 2017, Wilmar met with Amnesty International to discuss the action plan and progress. We are committed to providing regular updates to Amnesty International on our progress of implementing our action plan. In December 2017, Wilmar released a One Year Progress Update on Labour Review and Improvement Programme. This provides information on the improvements Wilmar has put in place over the last year including the progress on the work undertaken in collaboration with Verité'. However, CHRB is not looking for examples, but for a system that describes the frequency and triggers for engagement on human rights issues with affected stakeholders. [Amnesty International - Grievance, 09/08/19: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Workers in AG SC engaged</li> <li>• Not met: Communities in the AG SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: 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 remarks that it has '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'. No further evidence found in the Sustainability Report 2018. [Sustainability Report 2017, 2017: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification: It is stated that 'We have adopted a risk-based approach to due diligence in our supply chain, known as Aggregator Refinery Transformation (ART), (...) Beyond ART, we have enlisted the support of NGO partners to actively monitor and identify issues that could be linked to our suppliers at the plantation, mill or group level. This is a proactive strategy to manage supply chain risks and ensure compliance with our policies'. However, although in the Modern Slavery Act, the company appear to have it as a global policy, when consulting with the Transformation in Supply Chain document, it only makes reference to palm oil producers. No other evidence was found. The in Sustainability Report 2018, the company acknowledges that 'As part of our progress towards having 100% of our supply base assessed, we launched the SRT in 2017 for suppliers that have been evaluated to be of lower risk. The SRT is an online self-reporting system that enables suppliers to report their current compliance with Wilmar's NDPE policy'. However, the latter is part of compliance process, CHRB is looking for a global systems in place to identify its human rights risks and impacts on a regular basis across its activities. [UK Modern Slavery Act Transparency Statement 2018, 01/01/18: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Supply Chain Transformation, 08/03/2019: <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. [UK Modern Slavery Act Transparency Statement 2018, 01/01/18: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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, 01/01/18: <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</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context): The company indicates in the document Verité -Wilmar Programme that in 'the 12-month Wilmar-Verité programme has these key objectives: To build internal processes and competencies necessary to implement robust management and due diligence systems that are aligned to international standards and customer requirements, and informed by key stakeholders, and To formulate sustainable solutions to egregious, recurring and/or systemic labour problems in its Indonesian palm oil operations, and ensure sustained company-wide conformance to social standards, and to legal and customer requirements' Moreover, 'We are doing the best we can to identify and remediate any and all human and labour rights violations in our own operations and throughout our supply chains'. As indicated below, the programme included identification and assessment, however, no evidence found of these processes being carried out company-wide. [Making-progress-on-no-exploitation-commitments-ongoing-work-within-wilmar-operations-and-suppliers-1, 08/2016: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</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>• Not met: Both requirements under score 1 met</li> </ul>
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: Although the Company has the Aggregator Refinery Transformation Programme, it seems to be focused in monitoring and regular improvement that in Specific Action Plans to tackle specific general human rights risks identified by the Company in different regions. 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). [Supply Chain Transformation, 08/03/2019: <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 'The first step in solving a problem is recognizing the issues, and 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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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'. [Verite report on Wilmar programme, 02/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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. A grievance is a complaint, concern or problem related to the implementation of our NDPE policy which an individual or a group wants Wilmar to investigate and address'. 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 that it has the Supplier Reporting Tool (SRT), however, it only assess 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; Sustainability Report 2018, 2019]</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>• Not met: Comms plan re identifying risks: See indicator B.2.1</li> <li>• Not met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Not met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: See indicator B.2.4</li> <li>• Not met: Including AG suppliers: In the Supply Chain Transformations document that "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, t only applies for their palm oil production. Moreover, it says that it communicates the results to suppliers, but not stakeholders. [Supply Chain Transformation, 08/03/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</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 sates 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>

## C. Remedies and Grievance Mechanisms (15% of Total)

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 that 'An appropriate complaints mechanism and process for addressing grievances is in place for all Wilmar employees, including permanent and temporary workers. All plantation and mill units have site-specific complaints and grievances procedures, which have been a requirement of the RSPO P&amp;C since 2005'. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: Although the Company discloses its grievance list, it also indicates that other complaints are not registered on the grievance list. It is not clear the among of grievances in relation to human rights filed, addressed or resolved generally, including those from own employees. [Sustainability Report 2018, 2019 &amp; Grievance Procedure Updated 2019, 06/2019: <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. [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 that 'our management and staff use the Grievance Procedure as guidance when handling grievances filed by external parties concerning the implementation of Wilmar's policies'. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The company remarked that 'barriers to access to support after a grievance has been filed will be addressed on a case-by-case basis through (...) providing assistance with resources for grievance raiser who do not understand the grievance process, have language barriers, are illiterate or cannot afford to travel to meetings'. It also states that, 'we invite input from our stakeholders as this helps enhance transparency in our supply chain. To address issues raised by stakeholders, and ensure that dialogue is open and inclusive, we have established a Grievance Procedure that incorporates timelines and public updates on progress'. The channels are available online, however, it is not clear it is available in all local languages, as the Company states that procedure is available in English and Bahasa (Indonesia). [Grievance Procedure Updated 2019, 06/2019: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> <li>• Met: AG supplier communities use global system: It states that 'Wilmar launched a Grievance Procedure in January 2015 to record and investigate reports from stakeholders about potential breaches of our NDPE Policy by either Wilmar's own operations or our suppliers'. [Sustainability Report 2018, 2019]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system: The company indicates that 'Employees are made aware of the grievance process at the point of employment and receive regular reminders via online and offline channels'. 'A 2016 BSR assessment found that workers in Indonesia had a low level of awareness about grievance mechanisms, and were unclear whether temporary workers were covered. To address this, we are working with the RSPO to trial a mobile telephone-based grievance reporting tool called Ulula across our estates in 2019'. Moreover, 'RSPO (Roundtable on Sustainable Palm Oil )and Ulula designed a survey and feedback instrument aligned with the latest RSPO Principles and Criteria (P&amp;C) 2018 indicators on labour and human rights. It launched in January 2019 in Lahad Datu, Sabah, within the certified units of RSPO's participating member, WILMAR International. To facilitate the launch and build trust with the workers,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>management, and participating stakeholders, RSPO staff visited four WILMAR-owned estates and mills to introduce the initiative'. However, it is not clear how it engages with potential or actual users on the design, implementation or performance of the channel(s)/mechanism(s). [Sustainability Report 2018, 2019 &amp; RSPO decision (Kapa community): <a href="http://askrspo.force.com">askrspo.force.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Description of how they do this: See above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: It has a detailed timescale response depending on the type of grievance. [Grievance Procedure and list, 08/03/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: How complainants will be informed: There is a description of how complainants are informed. [Grievance Procedure and list, 08/03/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Escalation to senior/independent level: The Company discloses a chart showing how complaints can be escalated to Grievance Committee or even a verification team composed by Wilmar, an independent sustainability partner organisation, and an optional third party). [Grievance Procedure and list, 08/03/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: The Company's whistle blowing policy allows reports for breaches of the Group's policies or code of conduct, among other topics, it applies to 'all external parties who have a business relationship with the Wilmar Group. External parties include customers, suppliers, contractors and anyone who is a stakeholder of the Group'. It states that 'if you raise a genuine concern and 'whistleblow' under this Policy, you will not be at risk of losing your job or suffer retribution or harassment, if your acting in good faith, it does not matter if you are mistaken'. [Sustainability Report 2018, 2019 &amp; Grievance Procedure Updated 2019, 06/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company indicates that 'and process for addressing grievances is in place for all Wilmar employees, including permanent and temporary workers. All plantation and mill units have site-specific complaints and grievances procedures, which have been a requirement of the RSPO P&amp;C since 2005. These site-specific procedures are accessible to workers as well as other stakeholders. Employees can address verbal or written complaints to their supervisor or union representative, or make an anonymous complaint using an onsite feedback box'. The approach for external stakeholders grievance procedure within the human rights framework commits to 'providing a direct means of raising grievance for any stakeholder, including anonymously'. [Sustainability Report 2018, 2019 &amp; 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: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation: It is stated in the No-deforestation, No peat, No-exploitation Policy that "the company and its suppliers/sub-contractors shall ensure workers have access to judicial remedy and to credible grievance mechanisms, without fear of recrimination or dismissal." However, it does not mention that it protects suppliers' stakeholders from harassment. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms: The Company indicates that it 'and its suppliers/sub-contractors shall ensure workers have access to judicial remedy and to credible grievance mechanisms, without fear of recrimination or dismissal'. No evidence found, however, of public commitment to not impeding access to state-based judicia or non-judicial mechanism for persons who make allegations of adverse human rights impacts. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; 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: Complainants not asked to waive rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	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: Describes how remedy has been provided: The Company discloses a number of actions taken in with different issues that workers may face, such as wages and employment, caring for children in plantations, health and safety and union engagement. Regarding its gender equality [...] We have been working to address these issues as and when they have been identified. At present, in our North Sumatra operations, all women temporary workers have been given permanent worker status by Wilmar. This means these women workers can now enjoy maternity benefits from Wilmar. Further to that, we have also ensured that the menstrual leave application process is easier and less intrusive to our women workers. We have also ensured that all benefits and subsidies paid out to women are on par with that for our male workforce'. 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, 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://wilmarm-international.com">wilmarm-international.com</a> &amp; Collective-action-to-improve-labour-conditions, 15/11/2017: <a href="http://wilmarm-international.com">wilmarm-international.com</a>]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own agricultural operations)	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: Pays living wage or sets target date: The Company indicates that 'We pay fair wages to all employees and comply with minimum wage regulations, at the very least, for our lowest paid workers for all palm oil and sugar plantations, mills and refineries. This applies to both full-time and temporary workers that are subject to key performance indicators (KPIs). In 2018, all our workers received wages of at least the applicable minimum wage for our palm oil operations in Indonesia, Malaysia, Nigeria and Ghana. All permanent workers are also provided with free housing for themselves and their immediate families, as well as other benefits, such as facilities for children, including playgrounds, day-care centres for children of pre-school age, and access to education for children of school-going age'. Moreover, it states that 'we are committed to improving the pay structure together with the wider industry and stakeholders, as well as our partner Verité, to incentivise the harvesting of quality fruit while maximising workers' take-home pay. Work with Verité on our joint internal management processes is ongoing and expected to be completed by December 2018. Nevertheless, we have seen a steady increase in workers' pay since 2016'. However, it is not clear its target timeframe for paying all workers a living wage or that it has achieved paying the living wage, which should cover basic needs and some discretionary income for the employee and his/her family or dependents. [Sustainability Report 2018, 2019 &amp; Strengthening Labour Practices, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Describes how living wage determined: In addition to the work with Verite indicated above, the company indicates that 'we continue to take a proactive approach to working with labour unions in Indonesia and have built good working relationships with key union organisations. To date, we have three established Perjanjian Kerja Bersama, or collective labour agreements (CLAs), and one that is currently undergoing negotiations. These CLAs provide clarity on the link between KPIs and wages and are valid for workers who are union members. CLAs are negotiated between worker or union representatives and management'. However, it is not clear how it determines a living wage for the regions where it operates and the involvement of relevant trade unions on the making of this definition. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Paying living wage</li> <li>• Not met: Definition of living wage reviewed with unions</li> </ul>
D.1.1.b	Living wage (in the supply chain)	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: Living wage in supplier code or contracts: The Company states that 'wages - the company and its suppliers/sub-contractors shall ensure all workers are paid a wage equal to or exceeding the legal minimum wage'. However, no evidence that it requires a 'living wages' found. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Improving living wage practices of suppliers: The company indicates that 'PT SPMN has had several progress update meetings with Wilmar and have shared information and evidence on of the actions and improvements that have taken place since December 2016. Actions from PT SPMN have included: Introduction of system of payment of 'top-up' wages to meet at least minimum wage for workers who have not met their KPI targets based on the piece rate system'. Also, Wilmar began collaborating with BSR in November 2017 together with several global brands [...] to take collective action to improve working conditions and livelihoods of workers across the wider palm oil supply chain in Indonesia. Through this collaboration, BSR conducted a series of supplier workshops in the major palm oil producing regions in Sumatra and Kalimantan between November 2017 and May 2018. Some workshops were designed to raise awareness toward some key human rights issues including wages 'approximately 170 persons from Wilmar supplier companies participated in the workshops held in Medan, Pekanbaru And Jakarta from November 2017 to May 2018'. Some of the workshops included 'Minimum wage &amp; Living wage, Invisible labour' and 'Employment status – Permanent &amp; temporary workers'. [Wilmar Supplier Workshops 2018, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Strengthening Labour Practices Dec_17, 04/12/2017: <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> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs (purchasing practices): The company indicates that 'our flagship policy, the NDPE policy, extends to our suppliers. This means that we expect adherence to the core principles of the NOPE policy, including those that specifically cover Human Rights. 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'. However, it is not clear the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights or specific positive incentives it puts into place via its purchasing practices to encourage its business relationships to act with respect for human rights. [Human Rights Framework, 01/05/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing the supply chain	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: Identifies suppliers back to manufacturing sites (factories or fields): The Company discloses a chart with the 'Traceability data for all origin and destination facilities relating to supplies and shipments as at 31 December 2018'. This chart includes percentages of operation traceable to mill and known percentage for each country/region. The Company provides comprehensible explanation of traceability status: 'The original goal was set in 2013 was for all palm oil physically handled by Wilmar refineries to be traceable to the mill where it was processed. However, achieving full traceability has not been possible due to the ongoing challenges of commodity transportation and trading. In palm oil procurement and trading, the supply network to refineries is not limited to direct purchase of CPO and/or palm oil kernels (PK) from mills. Refineries may also procure bulk and/or redistributed oil from third-party refiners or traders, in which case details of the originating mill may be unavailable. Among Wilmar's third party suppliers, there is still a low level of willingness from many refiners to share information on their supplying mills, despite general support on the notion of traceability'. [Sustainability Report 2018, 2019 &amp; Sustainability Report 2017, 2017: <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: Discloses significant parts of SP and why: The company discloses maps of its suppliers with names and locations for different products. However, no evidence found of the Company indicating that has disclosed the most significant part of the supply chain, indicating why. The Company also discloses lists of sugar suppliers. [Supply-chain-map, 08/03/2019 &amp; Traceability back to mill, 08/03/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
D.1.4.a	Prohibition on child labour: Age verification and corrective actions (in own agricultural operations)	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: Does not use child labour: The company states that it "will not employ children that falls into the definition as stipulated by ILO Convention". [Child Protection Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: Age verification of job applicants and workers: The Company's approach within its human rights framework includes 'strict age-verification and other relevant procedures to ensure no under aged workers'. [Child Protection 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: Remediation if children identified: The Company indicates that it "shall employee remedial actions consistent with our "Remedial Action Guidelines" in the case child labour is uncovered to ensure appropriate follow-up and assistance for protection of the child's interests and welfare". The Child Protection policy also contains remedial action guidelines, including seeking advice and help from recognized organizations, develop remediation plans, understand the children's desires and explore the opportunities for them to re-enter education, etc. [Child Protection Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	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: Child Labour rules in codes or contracts: Child Protection policy requires adherence by contractors and suppliers. It includes commitment against child labour and protection of children rights. It also requires to 'maintain employment records documenting all relevant details of its employees, including age, and make these records open to verification by any authorised personnel of relevant statutory body'. Finally, it also includes remedial action guidelines to employee in case child labour is uncovered. [Child Protection Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> <li>• Not met: How working with suppliers on child labour: The company indicates that 'Complementing the CPP, a review of our plantations and its operations from the perspective of child safety was completed in July 2018. This included an assessment using the HIRARC (Hazard Identification, Risk Assessment, and Risk Control) approach, and a general review based on where children were identified as being normally and frequently occurring (i.e. where there is expected to be children, e.g. in the housing area, schools, etc). The result of the child safety assessment yielded some surprising results, for example that one of the biggest threats to children's safety on the estate, based on incidence occurrences, was linked to traffic and road safety. The child safety assessment has been shared with plantation operations management, and we are currently putting together a cohesive child safety program to ensure that there are consistently applied safety measures in place. The Child Safety Program will focus on: Wilmar's Progress in Strengthening Labour Practices 9 Nov 2018: educating caretakers and children about safety risks and mitigation measures; designing safer environments; and continuously reviewing children's interaction with the immediate surroundings and potential safety risks'. However, this seems to refer to Company's own operations. Moreover, in the document Protecting the Rights of Children Living in Plantations', the company states that 'Palm oil buyers and producers are working together to launch a programme to protect the rights of children living in oil palm plantations. The programme, which will run until the end of 2020, includes developing a Child Protection and Safeguarding Implementation Manual as well as a series of capacity building workshops to enable suppliers to learn, discuss and implement pragmatic measures to strengthen the rights and protection of children'. However, it is not clear how it works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant, as these activities seems focused in children surrounding operations (and first one, in own operations). [Child Protection Policy, 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> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own agricultural operations)	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: Pays workers in full and on time: The company indicates that 'Within our palm oil plantation and mill operations, we ensure that we recruit workers directly and without engaging third party agencies, where there are higher risks of force or coercion. The agents we do use are only contracted for administrative and logistical purposes, but full responsibility for payment is borne by Wilmar. In cases where team leaders are required to assist in the recruitment of local workers, they are paid an incentive to do so. While agents are commonly used for this purpose in Ghana and Nigeria, we regulate the process and do not permit the agent to request monetary deposits or other collateral as a condition of employment. We also ensure that these appointed agents comply with our NDPE policy'. However, no evidence found that the company pays workers regularly, in full and on time. [Sustainability Report 2018, 2019]</li> <li>• Not met: Payslips show any legitimate deductions: The company indicates that 'Through work with our partner Verité, we are looking to calculate work completed after regular hours for piece-rate workers with the aim of better compensating work rendered upon exceeding the minimum productivity output. (...) Now that payslips are available in Bahasa Indonesia, our focus is shifting to ensure that workers understand the pay system, and to empower them to be more active and engaged in their involvement with the business. We are working with unions to provide clarification of the link between KPIs and wages'. However, it is not clear that it is a global procedure. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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: Debt and fees rules in codes or contracts: The Company indicates that 'the company and its suppliers/sub-contractors shall ensure that no fees or costs have been charged, directly or indirectly, in whole or in part, to job-seekers and workers for the services directly related to recruitment for temporary or permanent job placement, including when using the services of Private Recruitment or Employment Agent or performing recruitment activities directly'. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: How working with suppliers on debt &amp; fees: The company indicates that 'Since 2017, Wilmar has collaborated with Business for Social Responsibility (BSR) and several other global brands to run a series of supplier workshops in the world's major palm oil producing regions. These workshops focus on improving working conditions and workers' livelihoods, and involve speaker representatives from the government, unions, civil society, business organisations, buyers and our suppliers. Tailored for Wilmar suppliers, these engagements target small and medium plantation companies with specific focus on their human resources personnel. Participants from our supplier companies participated in the workshops held in Medan, Pekanbaru and Jakarta throughout 2018'. However, it is not clear how the company works with suppliers to eliminate imposing any financial burdens on workers specifically (issues discussed involve wages &amp; contract status and grievance mechanisms &amp; labour unions). [Wilmar Supplier Workshops 2018, N/A: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.c	Prohibition on forced labour: Restrictions on workers (in own agricultural operations)	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: Does not retain documents or restrict movement: The Company indicates it 'and its suppliers/sub-contractors shall strive to ensure that job-seekers (...) are not subject to the unlawful withholding of wages, identification cards, passports or other travel documents, or other personal belongings without their consent'. [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>• Not met: How these practices are monitored for agencies, labour brokers or recruiters: The Company indicates that 'the human rights and labour provisions of the Bonsucro Production Standard have been socialised throughout our sugar operations to eliminate the risk of forced or compulsory labour. The provisions apply to all workers on mill and farm premises, including contract workers. In Myanmar, our labour head is subcontracted to hire workers for daily operations. In Australia, our farms operate in a heavily unionised and legislated environment where strong trade union involvement ensures that labour is voluntary and that employees are free to terminate employment at any time'. However, it is not clear how it, broadly within the Company, implements and checks that the workers' personal documents are not retained or workers' freedom of movement outside of work hours is not restricted or that workers are not required to stay at and pay for accommodation. Evidence seems to focus in particular areas/businesses. [Sustainability Report 2018, 2019]</li> </ul>
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	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: Free movement rules in codes or contracts: The Company states that "no unlawful document retention - the company and its suppliers/sub-contractors shall strive to ensure that job-seekers are not required to provide monetary deposit or other collateral as a condition of employment; and are not subject to the unlawful withholding of wages, identification cards, passports or other travel documents, or other personal belongings without their consent". [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: How working with suppliers on free movement: The Company indicates that 'we recognise the risk of forced labour occurring beyond our own operations, and have adopted a risk based approach to due diligence. This approach is informed by our ART and SRT traceability programmes and ensures our policies are socialized throughout all associated operations'. However, it is not clear how it works with suppliers to specifically eliminate detention of worker's documents or other actions to physically restrict movement. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.a	Freedom of association and collective bargaining (in own agricultural operation)	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 not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company indicates that '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. Workers can also utilise the union as a grievance channel or for collective bargaining purposes. Our engagement with unions supports our ambition to continuously strengthen labour practices in our operations. While our estates and mills have established forms of labour representation, most refineries do not have such associations. Therefore, in the absence of any proper collective agreement or association, Wilmar does not restrict workers from joining other unions. We also provide parallel means for workers to participate in independent free association and bargaining. (...) We continue to take a proactive approach to working with labour unions in Indonesia and have built good working relationships with key union organisations. To date, we have three established Perjanjian Kerja Bersama, or collective labour agreements (CLAs), and one that is currently undergoing negotiations. These CLAs provide clarity on the link between KPIs and wages and are valid for workers who are union members. CLAs are negotiated between worker or union representatives and management'. 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'. [Sustainability Report 2018, 2019]</li> <li>• Not met: Discloses % covered by collective bargaining agreements: Also, 'about 26% of the workers in our Indonesian operations, from estates to refineries, are formally covered by collective bargaining agreements. (...) Our Malaysian operations are not unionised, but we have ongoing engagements with workers on conditions and pay. For collective bargaining purposes, 100% of our estates have a Social &amp; Welfare Committee in place, with established SOPs to discuss matters such as wages. The Committee meets three times a year, is chaired by the manager of the estate or mill, and is attended by both management and worker representatives'. However, it is not clear what this percentage represents in relation to its whole workforce. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA &amp; CB rules in codes or contracts: The Company indicates that 'in keeping with RSPO Principle 6.6, 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'. However, no evidence found on prohibition of intimidation or retaliation against union members and representatives. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Met: How working with suppliers on FoA and CB: The company indicates that 'The 'Decent Rural Living Initiative' (DRLI) was initiated in March 2018 by Wilmar, Cargill, Golden-Agri Resources, Musim Mas and Sime Darby Plantations. Convened by Forum for the Future, the initiative seeks to improve the overall protection of labour and human rights in the agriculture sector by developing and delivering practical and realistic recommendation and plans that will further support and benefit rural workers and communities in developing countries. [...] The DRLI programme will kick off in Indonesia, where all its members operate, by addressing concerns relating to developing and implementing Collective Bargaining Agreements (CBAs)'. The Company also indicates that, 'since 2017, Wilmar has collaborated with Business for Social Responsibility (BSR) and several other global brands to run a series of supplier workshops in the world's major palm oil producing regions. These workshops focus on improving working conditions and workers' livelihoods, and, in addition to Wilmar, involved speaker representatives from the government, unions, civil society, business organisations, buyers and our suppliers'. Workshops include union-related topics and grievance mechanisms related to unions, i.e. union busting, "yellow" unions, worker committees may not be sufficient... [Strengthening Labour Practices, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.a	Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Lost days or near miss disclosures: The company discloses Lost Time Incident Frequency Rate (LTIFR) for 7 different regions of its palm oil operations as well as of its sugar operations. [Sustainability Report 2018, 2019 &amp; Annual Report 2018, 2019]</li> <li>• Met: Fatalities disclosures: The number of fatalities in 2018 across Wilmar own operations was 6. [Sustainability Report 2018, 2019]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance: The Company indicates that one of their targets is that '100% of workers in palm estates and mills have access to healthcare'. It continuously saying that this target was achieved 'All workers have access to healthcare facilities including insurance, onsite clinics, and transportation to and from clinics and/or hospitals (for emergencies)'. However, no evidence found of targets related to rates of injury, lost days and fatalities for the reporting period. [Sustainability Report 2018, 2019]</li> <li>• Not met: Met targets or explains why not</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company states that 'the company and its suppliers/sub-contractors shall protect workers from exposure to occupational health and safety hazards that are likely to pose an immediate risk of permanent injury, illness or death. We will work to protect workers, local communities, and the environment from exposure to hazardous chemicals. Use of pesticides that are categorized as World Health Organization Class 1A or 1B listed by the Stockholm or Rotterdam Conventions are not used, except in specific and urgent situations. The use of Paraquat is prohibited. We will work with stakeholders to determine and implement alternative pest control strategies to totally avoid these pesticides'. The Company also includes requirements on workplace accident insurance. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Injury Rate disclosures: No evidence found of injury rate figures for the company's suppliers. [Sustainability Report 2018, 2019]</li> <li>• Not met: Lost days or near miss disclosures: The company discloses quantitative information on health and safety, however it only covers its own workers. No evidence found for suppliers. [Sustainability Report 2018, 2019]</li> <li>• Not met: Fatalities disclosure: The company discloses quantitative information on health and safety, however it only covers its own workers. No evidence of fatality figures for suppliers. [Sustainability Report 2018, 2019]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.a	Land rights: Land acquisition (in own agricultural operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Approach to identification of land tenure rights holders: The Company states that it aims 'to engage the affected communities in an open, consultative manner to bring about a free, prior, informed and consensual solution that benefits all parties. In addition, Wilmar will not threaten or diminish, directly or indirectly, the resources or tenure rights of local communities'. Moreover, it indicates that 'making reference to the Food and Agriculture Organization's Voluntary Guidelines on the Responsible Governance of Tenure, Wilmar will respect tenure rights, and recognize duties and responsibilities associated with tenure rights, such as respect for the long-term protection and sustainable use of land, forests, and fisheries. This is done in cognizance of the national obligations, constitutions, local laws and regulations of the country we are operating'. However, no further information about the approach taken to identify land tenure. Including in its human rights framework document. [AFFIRMS COMMITMENT TO OPEN, TRANSPARENT &amp; RESPONSIBLE PRACTICES: <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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Approach to doing so if no recent land deals: The Company indicates that 'Our standard practice involves negotiating with individual landowners and local community leaders, or the government, depending on the country. We endeavour to be respectful of local communities whenever such disputes arise and are committed to building long-term relationships in a consensual manner as part of our goal of achieving harmonious relations with Community Relations all our stakeholders. We have engaged with many of these communities through participative mapping and strive to address concerns through mediation processes'. However, it is not clear if this is the process to identify legitimate land tenure rights holders. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works: The Company indicates that 'we strive for a fair compensation to the local community leaders for existing crops, with statutory levels of compensation as a minimum'. However, no further details found on compensation, including valuation methods and how legitimate tenure rights holders are involved. [Sustainability Report 2018, 2019]</li> <li>• Not met: Follows IFC5 in any state land deals</li> <li>• Not met: Describes approach if no recent land deals</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	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: Rules on land &amp; owners in codes or contracts: Although the company commits to Respect Land Tenure Rights, no mention was found of a requirement to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, with particular attention to vulnerable tenure rights holders, in its supplier code of conduct. [No Deforestation, No peat No exploitation Policy, 05/12/13: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: How working with suppliers on land issues: The company indicates that 'based on Wilmar's ongoing desktop monitoring, land clearing was detected in the HCS areas. PT Aloer Timur clarified that the land clearing was a result of illegal encroachment. Wilmar met with Mopoli Raya on 17 March 2017 and 28 July 2017 to discuss the community encroachment challenges in their concession. Together with Earthworm Foundation (EF), Wilmar conducted two field visits to PT Aloer Timur in December 2017 and April 2018 to verify the situation on the ground. Based on the visits result, it was confirmed that deforestation since 2015 was carried out by external parties who were not part of the local community and had illegally occupied PT Aloer Timur's land permit area and undertaken illegal logging'. However, it is not clear how the company works with suppliers to improve their practices in relation to land use/ acquisition. [Mopoli, 11/08/19: <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> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.a	Water and sanitation (in own agricultural operations)	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: Action to prevent water and sanitation risks: The Company indicates that 'We recognise the need to carefully manage our use of water, an essential and finite global resource. We have therefore implemented comprehensive measures to safeguard water quality, increase water efficiency and improve water management. We are also working to minimize the use of potable water across all our operations. These measures are designed to mitigate any negative impacts that our palm oil and sugar operations have on waterways'. However, it is not clear how it implements preventive and corrective action plans for identified specific risks to the right to water and sanitation in its own operations. Evidence focuses in quality of discharges to environment. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: The Company's targets for water is to 'Reduce water consumption intensity (mill process only) for palm oil mills based on 2016 baselines with absolute targets: 1.2m3/MT FFB for Indonesia and 1.3m3/MT FFB for Malaysia and Ghana' for which the company indicates that it still on track 'Water usage for Sarawak, Central Kalimantan and Sumatra were within respective absolute targets in 2018'. However, it is not clear if this target takes into consideration water use by local communities and other users in the vicinity of its operations. [Sustainability Report 2018, 2019]</li> <li>• Not met: Reports progress and shows trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.9.b	Water and sanitation (in the supply chain)	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: Rules on water stewardship in codes or contracts: The Company indicates that 'we recognise the need to carefully manage our use of water, an essential and finite global resource'. However, no mention found of a access to water and sanitation requirements, including refraining from negatively affecting access to safe water, in its contractual arrangements with its suppliers or in its supplier code of conduct. [Sustainability Report 2018, 2019]</li> <li>• Not met: How working with suppliers on water stewardship issues: The Company indicates that 'Wilmar is a founding member of the Baratta Creek Action Group (BCAG), a partnership between sugarcane farmers, the government and providers of research, development and agricultural extension. BCAG captures data on nutrients and pesticide loads in runoff water to influence on-farm activities to improve water flowing to the Great Barrier Reef, as well as to increase awareness of potential loss pathways for fertilisers and pesticides applied to the land by producers'. However, it is not clear how it works with suppliers to improve their practices in relation to access to water and sanitation. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.a	Women's rights (in own agricultural operations)	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: Process to stop harassment and violence against women: The Company has a 'Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy'. It indicates that 'further harassment, violence and abuse, and infringement reproductive rights against complainants or retaliation against complainants or others who participate in the investigation process of a complaint will not be tolerated. Appropriate disciplinary and/or remedial action will be taken against individuals found to engaging in such misconduct'. [Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Working conditions take account of gender: The Company indicates that 'Wilmar International believes that the work environment needs to be diverse, is not discriminatory, and provides equal opportunities. Women are an important part of our workforce. We recognize that women may have responsibilities and societal expectations outside of work, that can have impacts on the decisions and choices that they make regarding their careers and work. With this recognition Wilmar is committed to providing the best possible means of support for women, whether they are our employees, or live in housing estates in our operations'. Moreover, it states in the report of 2018 that 'we recognise that many women in our oil palm plantations are on temporary rather than permanent work contracts for the purposes of having flexible working hours to manage domestic and childcare responsibilities. In Central Kalimantan, where all temporary workers have now been converted to permanent status, we have ensured that all female workers can now enjoy maternity benefits. Menstrual leave application processes have also been made easier and less intrusive. All benefits and subsidies paid out to women are now on par with those paid out to our male workforce'. Finally, the company acknowledges 'reproductive rights are legal rights and freedom relating to reproduction and reproductive health as couples and individuals: to decide freely and responsibly the number, spacing and timing of their children; to make decisions concerning reproduction free of discrimination, coercion and violence'. However, no description found of how it takes into account differential impacts on women and men on working conditions, including to reproductive health. [Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Women's Charter, 01/05/2019: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• Not met: Equality of opportunity at all levels of employment: In addition, 'Wilmar is committed to providing equal opportunity for each employee'. In line with their Equal Opportunity Policy, Wilmar will not discriminate based on gender, sexual orientation, when making decisions on hiring, promotion or retirement. Also, it indicates that it 'endeavours to provide a conducive working environment that is characterized by equality'. However, it is not clear how it provides equality of opportunity for women in the workforce that are monitored and maintained throughout all levels of employment. [Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Equal Opportunity 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>• Not met: Meet all requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts: Although the Company mentions that it has a non-discrimination policy when it comes to equal pay, no evidence of this policy applicable to their suppliers was found. It also says that women may need specific policies, however, no further explanation found. [Sustainability Report 2018, 2019]</li> <li>• Not met: How working with suppliers on women's rights: The Company indicates that 'Wilmar has been assessed by Verité since 2016 on concerns relating to gender inequality. We have been working to address these issues as and when they have been identified. At present, in our North Sumatra operations, all women temporary workers have been given permanent worker status by Wilmar. This means these women workers can now enjoy maternity benefits from Wilmar. Further to that, we have also ensured that the menstrual leave application process is easier and less intrusive to our women workers. We have also ensured that all benefits and subsidies paid out to women are on par with that for our male workforce'. However, this refers to companies' own operations. The Company also provides a news document from third party website in which joint projects are commented, including a pilot project to improve gender equality through gender committees on palm oil states. However, it seems that it has not yet been rolled out, including specific details. [Strengthening Labour Practices Nov_2018, 09/11/2018: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

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 land grabbing and pollution by local communities in Nigeria</li> <li>• Area: Land Rights and Environmental Damage</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 for alleged pollution and land grabbing. Subsistence farmers in these communities argue that they been displaced, with denied access and ownership to the land and cultural heritage without compensation. In addition, the drainage channels introduced as embankment by Wilmar have not only caused devastation to crops but has further disrupted and contaminated the streams in the area. The area's rich biodiversity has been altered and the environment degraded by the use of pesticides and chemicals fertilizers.</li> </ul> <p>The communities made a 4 point demand: "Wilmar should enter fresh consultation with the communities on how to implement the mandatory CSR Ia of the State; Wilmar should be made to halt further expansion into individual, families and communities lands as well as conduct a FPIC (Free, Prior Informed Consent) before expansion commence; that the Environmental Impact Assessment (EIA) of Wilmar be reviewed; And that the existing Memorandum of Understanding (MoU) and other laws should be enforced and Wilmar made to comply accordingly.</p> <ul style="list-style-type: none"> <li>• Sources: [Business &amp; Human Rights Resource Centre - 27/08/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>][The Guardian - 27/08/2018: <a href="http://guardian.ng">guardian.ng</a>]</li> </ul>
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 land grabbing and environmental degradation. [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> <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 land grabbing and environmental degradation. [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>
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,</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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." In addition, Wilmar makes a clear commitment to protect the environment in its 2015 Environmental Policy. [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>]</p> <ul style="list-style-type: none"> <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	0.5	<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>• Not met: Denies allegations, but has engaged affected stakeholders: In its response to the allegations of land grabbing, 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 further details of the MOU are not disclosed, and this is not sufficient evidence of recent engagement with the affected communities in light of the allegations raised. Regarding the allegations of pollution, the company says it has collected water samples from the trenches in the presence of a family representative alleging destruction of farmland to be analysed. [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>• Met: Denies allegations, but reviewed systems to prevent such impacts: In regarding the allegations of land grabbing, the company says that the MOU developed and signed with the government was also signed with local communities and has remained enforced till date, and is to be reviewed every 10 years. The first review will be in 2021 for Calaro and Ibiae Estates. The company also said that as of August 2018, Biase Plantations Limited and its sister company Eyop Industries Limited (EIL) recognizes 20 communities directly having ancestral history on the land and have fulfilled all the obligations under the Fundamental Terms of Agreement and the Memorandum of Understanding (MOU). These include providing employment creation, payment of annual royalties, provision of basic infrastructure, and scholarships for qualified candidates for the host communities. In relation to pollution the company said that it had collected water samples along the trenches, which when analysed, gave results "generally within WHO and Federal Ministry of Environment limits for water except Total suspended solids, Iron and Lead. However, these concentrations are within natural/baseline levels as shown in previous reports in Calaro and within Akamkpa and Cross River." [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> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Denies allegations, but implements review recommendations: Regarding allegations of land grabbing, the company has said that the MoU, which was originally developed and signed with the government and local communities is to be reviewed in 2021, however, as this review has not yet been conducted, and there is no evidence of other reviews into the companies management systems for ensuring FPIC and preventing land grabbing, this is not sufficient. Regarding the allegations of pollution, the company says "The results of the water samples collected have shown that no toxic chemicals have been channelled to community farms as alleged by their Guardian NG report and also historical maps have also proven that the areas now flooded in community farms have been so before BPL started operations in the area concerned." However there is no further evidence of the company reviewing its environmental management systems, particularly relating to the use of agrochemicals near community farmland. [Farmland grab</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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>]</p> <ul style="list-style-type: none"> <li>• Not met: Denies allegations, and ensures systems prevent such impacts: Based on the information above, the company has not provided evidence of having reviewed its management systems or describing any changes that have been implemented to ensure that its current systems in place will prevent future impacts of a similar nature. [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> </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 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). The complaint had originally been lodged by the Community of Nagari Kapa, the NGO Forest People Programme and HUMA against PT Permata Hijau Pasaman I.</p> <ul style="list-style-type: none"> <li>• Sources: [Business &amp; Human Rights Resource Centre - 16/02/2017: <a href="http://business-humanrights.org">business-humanrights.org</a>][Wilmar - 26/04/2017: <a href="http://ir-media.wilmar-international.com">ir-media.wilmar-international.com</a>][Roundtable on Sustainable Palm Oil - 26/09/2018: <a href="http://askrspo.force.com">askrspo.force.com</a>]</li> </ul>
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="http://ir-media.wilmar-international.com">ir-media.wilmar-international.com</a> &amp; Mongabay (Kapa community) article, 17/05/2017: <a href="http://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. [RSPO decision (Kapa community): <a href="http://askrspo.force.com">askrspo.force.com</a> &amp; Wilmar appeal (Kapa community), 07/07/2018: <a href="http://ir-media.wilmar-international.com">ir-media.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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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. [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	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: 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): <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>• Not 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. However, a press release from the Forest Peoples Programme in December 2018 states that following the initial lodging of the complaint, several Kapa communities members including Mr. Alman Gampo Alam were arrested &amp; sentenced to between 3 months and one year in jail on charges of misuse of community funds, which were based on allegations from Kapa community members who were also employees of PT. PHP1. The release notes that Mr. Alman remains in prison, and there is not public evidence the other community members receiving compensation, thus remedy cannot be considered to be provided. [RSPO decision (Kapa community): <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>• Not met: Has reviewed management systems to prevent recurrence: The company has not provided any publicly available evidence that it has reviewed its management system in relation to engagement with indigenous communities on the issue of FPIC, following the resolution of the Nagari Kapa complaint to the RSPO. [2018 Sustainability Report, 2018: <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: Remedies are satisfactory to the victims: A press release from the Forest Peoples Programme in December 2018 states that following the initial lodging of the complaint, several Kapa communities members including Mr. Alman Gampo Alam were arrested &amp; sentenced to between 3 months and one year in jail on charges of misuse of community funds, which were based on allegations from Kapa community members who were also employees of PT. PHP1. The release notes that Mr. Alman remains in prison, and there is not public evidence the other community members receiving compensation, thus remedy cannot be considered to be provided. [Forest Peoples response (Kapa community), 04/12/2018: <a href="http://forestpeoples.org">forestpeoples.org</a> &amp; RSPO decision (Kapa community): <a href="http://askrspo.force.com">askrspo.force.com</a>]</li> <li>• Not 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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			mapping process was carried out through consultation with Nagari Kapa and local government bodies followed up with an implementation plan". However, the company has not provided any publicly available evidence that it has improved its systems of engagement with indigenous communities, particularly regarding its approach to FPIC. [RSPO decision (Kapa community): <a href="http://askrspo.force.com">askrspo.force.com</a> & 2018 Sustainability Report, 2018: <a href="http://wilmar-international.com">wilmar-international.com</a> ]
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Wilmar accused of intimidation and attempts to cover up labour abuses from child and forced labour in palm oil production in Indonesia</li> <li>• <b>Area:</b> Child labour, FoA &amp; CB</li> <li>• <b>Story:</b> 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 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.</li> </ul> <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> <ul style="list-style-type: none"> <li>• <b>Sources:</b> [Thomson Reuters Foundation News, 7/3/2017: <a href="http://reuters.com">reuters.com</a>][Amnesty International, 7/3/2017: <a href="http://amnesty.org">amnesty.org</a>][Amnesty International, 30/11/2016: <a href="http://amnesty.org">amnesty.org</a>]</li> </ul>
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>• <b>Met:</b> 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="http://wilmar-international.com">wilmar-international.com</a> &amp; Amnesty International article, 2017: <a href="http://amnesty.org">amnesty.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> 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="http://wilmar-international.com">wilmar-international.com</a>]</li> </ul>
E(3).2	The Company has appropriate policies in place	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>• <b>Met:</b> 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="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2017, 2017: <a href="http://wilmar-international.com">wilmar-international.com</a>]</li> <li>• <b>Met:</b> 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="http://wilmar-international.com">wilmar-international.com</a> &amp; Sustainability Report 2017, 2017: <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>Not 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. However the company doesn't describe the measures it puts in place to prevent retaliation against union members. [Child Protection Policy, 01/2018: <a href="http://wilmar-international.com">wilmar-international.com</a> &amp; Code of Conduct, 01/09/2017: <a href="http://ir-media.wilmar-international.com">ir-media.wilmar-international.com</a>]</li> </ul>
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, 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 Verité 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 Perjanjan 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>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.43 out of 4	Out of a total of 51 indicators assessed under sections A-D of the benchmark, Wilmar International made data public that met one or more elements of the methodology in 31 cases, leading to a disclosure score of 2.43 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company remarks that 'this report has been prepared in accordance with the GRI Standards: Core option' and it discloses a Global Reporting Initiative (GRI) Index. [Sustainability Report 2018, 2019]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Wilmar International met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.1.1.a: Living wage (in own agricultural operations)</li> <li>• Not met: Score 2 for D.1.7.a : Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)</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 2019 Key Findings report and technical annex for more details of the research process.

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and Wales.

As CHRB Ltd, 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.