

No Deforestation, No Peat, No Exploitation Policy

Quarter 4 - 2016 Update



Kindergarten class in Wilmar's estate in Indonesia

Leading Transformational Change

Supply Chain Mapping & Traceability
Stakeholder Engagement
Empowering Smallholders
Conservation Initiatives
Policy Compliance

Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) Policy Implementation Progress

In the final quarter of 2016, Wilmar made good progress on a range of sustainability initiatives. Our global sustainability team participated in and hosted a number of high profile events around the world. Important milestones were achieved in our smallholder projects in Malaysia and Honduras. We have also formally established a partnership with Golden Agri-Resources and Business for Social Responsibility (BSR) to formulate practical approaches to improving labour practices in Indonesia.

Supply Chain Mapping & Traceability

Traceability Improvements Across Almost All Our Global Operations

Traceability analysis and summary data continue to be measured across Wilmar's global operations: Indonesia, Malaysia, India, Bangladesh, Sri Lanka, China, Nigeria, Ghana, South Africa, Ivory Coast, Vietnam, United States of America, Uganda, Ukraine and Europe.

Traceability data has been updated to include the most recent four quarters, replacing Q3 2015 supplies with Q3 2016 supplies. The data below for all facilities relates to data on supplies and shipments for year Q4 2015 – Q3 2016. For China – Oleochemicals the drop in traceability ratings is mainly due to inclusion of lauric-based fine chemical sourcing for our Shanghai Oleochemical facility since Q4 2015. A few suspended mills continue to appear on the latest mill list for our refinery in Europe (Rotterdam). Our suppliers have confirmed that they have halted purchases from the mills-in-question since mid-2015. As the mills lists are updated on a quarterly basis, and each update covers four calendar quarters, material from mills in the early part of 2015 shall continue to appear on the mill list throughout year 2016.

Indonesia

In total, there are 7.89 million mt of CPO and 1.15 million mt of PKO from our Indonesian refineries that are traceable to mills.

Refinery	Code	%Traceability			
		Mill		Plantation	
		Palm	Lauric	Palm	Lauric
PT Multimas Nabati Asahan, Kuala Tanjung	MNA, KTJ	99.1	95.2	6.8	5.9
PT Multimas Nabati Asahan, Pulo Gadung	MNA, PG	97.9	-	0.0	-
PT Multimas Nabati Asahan, Paya Pasir	MNA, PPS	-	99.5	-	8.0
PT Multimas Nabati Sulawesi, Bitung	MNS, BTG	99.9	95.4	0.0	0.0
PT Sinar Alam Permai, Kumai	SAP, KMI	99.7	-	15.5	-
PT Sinar Alam Permai, Palembang	SAP, PLG	89.8	91.6	11.2	15.5
PT Usaha Inti Padang, Padang	UIP, PDG	-	99.8	-	16.0
PT Wilmar Cahaya Kalbar, Cikarang	WICA, CKG	-	97.1	-	0.0
PT Wilmar Cahaya Kalbar, Pontianak	WICA, PTK	88.5	96.5	9.8	2.6
PT Wilmar Nabati Indonesia, Bagendang	WINA, BGD	100.0	-	0.0	-
PT Wilmar Nabati Indonesia, Balikpapan	WINA, BLK	83.5	0.0	0.0	0.0
PT Wilmar Nabati Indonesia, Dumai	WINA, DMI	90.7	74.5	4.8	0.0
PT Wilmar Nabati Indonesia, Gresik	WINA, GSK	94.3	90.8	13.0	13.8
PT Wilmar Nabati Indonesia, Padang	WINA, PDG	94.0	98.3	13.4	0.0
PT Wilmar Nabati Indonesia, Pelintung	WINA, PLT	95.0	83.9	10.2	4.7

Malaysia

In total, there are 5.28 million mt of CPO and 0.60 million mt of PKO from our Malaysian refineries that are traceable to mills.

Refinery	Code	%Traceability			
		Mill		Plantation	
		Palm	Lauric	Palm	Lauric
Bintulu Edible Oils Sdn Bhd, Bintulu	BEO	99.9	100.0	6.8	6.2
Lahad Datu Edible Oils Sdn Bhd, Lahad Datu	LDEO	100.0	94.1	28.8	34.8
Natural Oleochemicals Sdn Bhd, Pasir Gudang	NatOleo	80.2	85.5	0.0	0.0
PGEO (Lumut Division) Edible Oils Sdn Bhd, Lumut	PGEO, Lumut	99.7	100.0	0.0	1.1
PGEO Edible Oils Sdn Bhd, Pasir Gudang	PGEO, Pasir Gudang	99.3	98.9	3.1	15.1
PGEO (Prai Division) Edible Oils Sdn Bhd, Prai	PGEO, Prai	99.6	-	0.3	-
Sandakan Edible Oils Sdn Bhd, Sandakan	SEO	100.0	100.0	25.8	23.8
TSH-Wilmar Sdn Bhd, Kunak	TSHW	100.0	100.0	0.2	8.7
Wilmar Edible Oils Sdn Bhd, Butterworth	WEO	96.0	-	0.4	-

India, Bangladesh & Sri Lanka

In total, there are 0.84 million tonnes of palm products and 0.05 million tonnes of lauric products entering our refineries below that are traceable to mills.

Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Adani Wilmar Limited, Haldia	AWL, Haldia	81.7	-
Adani Wilmar Limited, Kakinada	AWL, Kakinada	73.1	98.3
Adani Wilmar Limited, Krishnapatnam	AWL, Krishnapatna	60.7	-
Adani Wilmar Limited, Mangalore	AWL, Mangalore	65.6	-
Adani Wilmar Limited, Mundra	AWL, Mundra	82.2	85.3
Adani Hazira Port Pvt. Limited	Hazira	95.0	-
KOG - KTV Foodstuffs (I) Pvt Ltd, Tuticorin	KOG-KTV	39.7	-
KTV Health Food Pvt Ltd, Chennai	KTV	41.8	-
Bangladesh Edible Oil Limited	BEOL	98.0	-
Shun Shing Edible Oil Limited	SSEOL	53.8	-
Pyramid Lanka (Private) Limited	PL	99.7	100.0

China – Specialty Fats

In total, there are 0.32 million mt of palm products and 0.10 million mt of lauric products entering our refineries in China that are traceable to mills.

Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Yihai (Guangzhou) Oils & Grains Industries Co Ltd	Guangzhou O&G	21.9	95.6
Kerry Speciality Fats (Shanghai) Ltd	Kerry SF - Shanghai	46.4	89.4
Kerry Oils & Grains (Tianjin) Ltd	Kerry O&G - Tianjin	20.9	75.8
Yihai (Lianyungang) Speciality Fats Industries Co.Ltd	Lianyungang SF	26.4	88.4
Qinhuangdao Goldensea Foodstuff Industries Co Ltd	QHD Goldensea	26.9	61.7
Southseas Oils & Fats Industrial (Chiwan) Ltd	Southseas - Chiwan	40.1	96.5

China – Oleochemicals

In total, there are 0.34 million mt of palm products and 0.06 million mt of lauric products entering our refineries in China that are traceable to mills.

Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Wilmar Oleochemical (Dongguan) Co., Ltd	Oleo - Dongguan	66.4	86.2
Wilmar Oleochemical (Lianyungang) Co., Ltd	Oleo - Lianyungang	78.4	49.4
Wilmar Oleochemical (Shanghai) Co., Ltd	Oleo - Shanghai	48.7	21.4
Wilmar Oleochemical (Tianjin) Co., Ltd	Oleo - Tianjin	91.1	85.2

Africa

In total, there are 1.00 million tonnes of palm products and 0.05 million tonnes of lauric products entering our refineries in Africa that are traceable to mills.

Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Wilmar Africa Limited	WAL	99.8	100.0
PZ Wilmar Ltd	PZ Wilmar	72.8	-
Wilmar Continental Edible Oils & Fats (Pty) Limited	Wilmar Continental	99.3	95.9
Sania CIE	Sania	100.0	100.0
Bidco Uganda Limited	Bidco	46.4	94.2

Europe

In total, there are 0.81 million mt of palm products and 0.15 million mt of lauric products entering our refineries in Europe that are traceable to mills.

Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Wilmar Edible Oils GmbH	Brake	100.0	100.0
Wilmar France Holdings	Lavera	-	77.0
Wilmar Edible Oils BV	Rotterdam	99.9	98.8
Wilmar Oleochemicals BV	Rozenburg	-	81.6

United States of America

In total, there are 0.15 million mt of palm products entering our refinery in United States of America that are traceable to mills.

Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Wilmar Oils & Fats (Stockton) LLC	WOFS	99.3	-

Vietnam

In total, there are 0.26 million mt of palm products and 0.0004 million mt of lauric products entering our refineries in Vietnam that are traceable to mills.

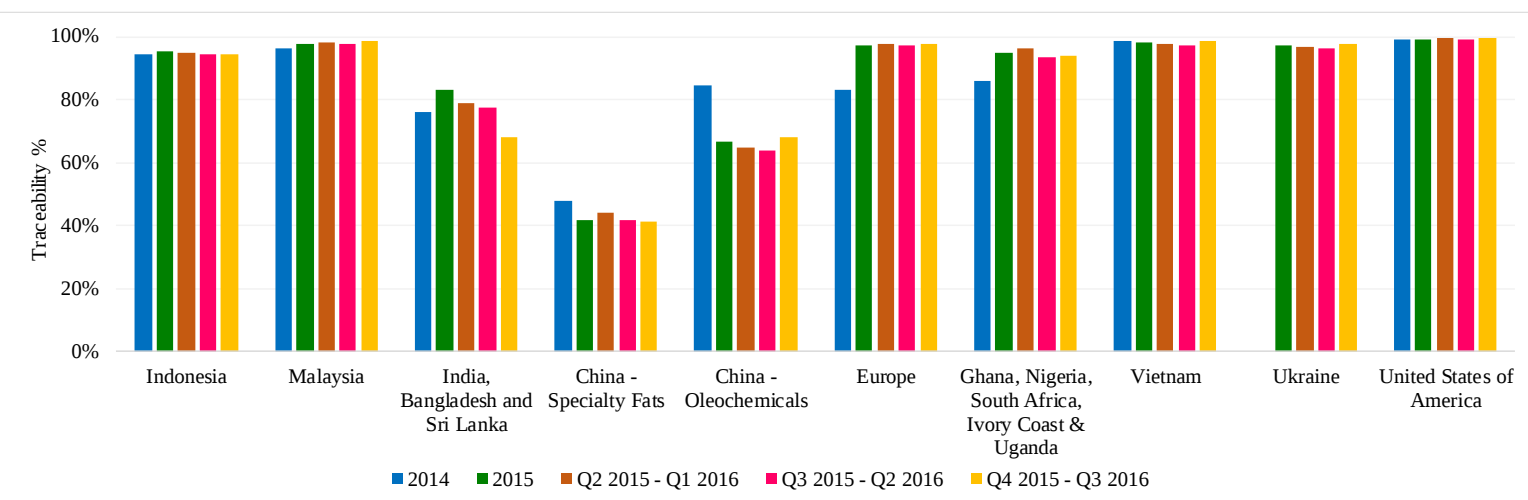
Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Calofic Hiep Phuoc	Hiep Phuoc	99.3	95.2
Calofic Quang Ninh	Quang Ninh	97.1	-

Ukraine

In total, there are 0.21 million mt of palm products and 0.007 million mt of lauric products entering our refineries in Ukraine that are traceable to mills.

Refinery	Code	%Traceability	
		Mill	
		Palm	Lauric
Delta Wilmar CIS Ltd	DW	97.6	95.1

The following graph represents our progress from the time we started traceability reporting back to mills in 2014 to Q3 2016:



Stakeholder Engagement

Active Participant in Multi-Stakeholder Partnerships

TFA2020 Africa Palm Oil Initiative (APOI) 2nd Regional Workshop in Côte d'Ivoire

Tropical Forest Alliance 2020, Solidaridad, and Proforest jointly organised the APOI second regional workshop on 6 and 7 October 2016. The aim of the APOI is to develop and support the implementation of a set of regional principles for responsible palm oil development that take account of the ambitious development plans of countries in Africa, while addressing both environmental targets for reduced deforestation, land use and greenhouse gases, and also social indicators on issues, such as land tenure and the rights of indigenous peoples.

The objective of the second workshop was for government representatives from the nine Central and West African countries participating in the APOI to agree on the wording of the draft Regional Declaration for Responsible Palm Oil Development. Wilmar was represented by Mr. Samuel Avaala Awonnea (Group Manager, Benso Oil Palm Plantation and President of the Oil Palm Development Association- Ghana).

Grow Asia Practitioners' Workshop in Singapore

Wilmar participated in the inaugural Grow Asia Practitioner's Workshop, held in Singapore on 12 and 13 October 2016. The purpose of the workshop was for partners from government, civil society, private sector and farmers to share their experiences across crops and countries and co-develop solutions. Wilmar showcased a pilot project which seeks to build increased future supply of sustainable palm oil production from smallholders by providing financial support to enable RSPO certification and replanting. Feedback received from the workshop on the structuring of the financial model for the project will greatly help refine this model for potential scale up.

International Plant Nutrition Institute (IPNI) and Best Management Practices (BMP)

Wilmar's team in Africa has been active participants in activities organised by the IPNI. We presented a paper giving an overview of the growing oil palm sector in Ghana at the IPNI annual meeting held in Takoradi, Ghana, from 15-16 November 2016.

As part of IPNI's annual review programme, they embarked on a filming project of BMP activities in participating plantations, to produce a "BMP Documentary". Filming was carried out in Wilmar's Benso Oil Palm Plantation (BOPP) on 19 November

2016, featuring interviews with BOPP General Manager, Mr Samuel Avaala Awonnea, estate managers and divisional managers.

The documentary will be used as part of training materials for other sites participating in BMP.



Monitoring Private Sector Conservation Policies - Mighty

Wilmar, together with Mighty, hosted a private forum on 29 November 2016, to discuss the creation of an independent, cross-commodity, deforestation-monitoring and alert system for Southeast Asia. This will leverage existing monitoring tools, and assist the private sector, civil society, government and other stakeholders in quickly and cost-effectively reducing deforestation. The forum was attended by 23 high-level participants from the commodities and forestry industries, NGOs, civil society and government.

Sustainable Palm Oil Leaders' Summit

Wilmar participated in the Sustainable Palm Oil Leaders' Summit on 29 November 2016, organised by the Singapore Alliance for Sustainable Palm Oil (SASPO). SASPO plays an important role in raising the awareness about sustainable palm oil among Singaporean stakeholders, and we look forward to continue supporting SASPO's activities.

FGV-FELDA Labour Workshop

Wilmar participated in a Labour Issues workshop organised by FGV-Felda on 20 December 2016. The workshop focused on labour issues prevalent in the palm oil industry, such as recruitment fees, passport retention and children in the workplace. Wilmar shared our experience in handling labour issues raised through our grievance procedure, and support FGV-FELDA's call for collective action to improve labour practices in the industry.

Empowering Smallholders

Building Capacity of Independent Smallholders

Integrating Smallholders in Traceable, Sustainable and Deforestation-free Supply Chains

Wilmar, in partnership with Geotraceability and Wild Asia, and supported by the Sustainable Trade Initiative (IDH), has achieved the first milestone in the development of a new smallholder traceability system.

The new system enables mills to map their smallholder supply base and trace smallholder fresh fruit bunch (FFB) deliveries from the mills back to their farms. A key innovation in this project is the ability to provide smallholders with agronomic recommendations from mills and supporting organisations for increasing productivity, as part of their participation in the traceability system.

This project, an industry first, is currently piloted in Wilmar's Sapi Plantation in Sabah, Malaysia. The ability to trace smallholder FFB supply is critical to Wilmar in ensuring compliance by our third-party mill suppliers, and their independent smallholder suppliers with our No Deforestation, No Peat and No Exploitation policy.

More information can be found in our press release on 8 November 2016, available at this [link](#).

Wilmar Smallholders Support in Honduras (WISSH)

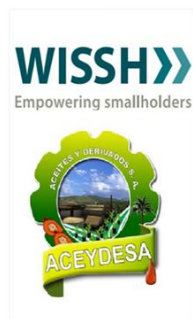
The WISSH programme was initiated at the beginning of 2016 with the aim to empower smallholders and improve their livelihoods, while maintaining responsible sustainable practices. WISSH is a partnership between Wilmar Europe and The Industrial Association of Palm Oil Producers in Honduras (AIPAH).

A second series of training programmes for smallholders has been conducted, and a total of 1,908 smallholders were trained over 51 sessions.



Representatives from Wilmar Europe joined one of the training sessions in Honduras to better understand the programme and seek feedback from participants; this will help adapt and improve the programme where required.

Our implementation partner, NES Naturaleza, is



piloting a mobile application (app) to facilitate crop management. The app is a monitoring and controlling tool that enables record keeping of field activities, such as

pesticide application, fossil fuel use, and harvesting schedules. The app is currently being tested at the Aceydesa mill. The third edition of the WISSH pocket guidebook for smallholders, which contains information on the functionalities of the app, has also been published and distributed.

Conservation Initiatives

Biodiversity Conservation and Climate Change Mitigation

Drone Mapping of HCV Areas to Assess Siamang Rehabilitation Site

In October 2016, Wilmar's Geographical Information System (GIS) team conducted drone mapping of the High Conservation Value (HCV) areas in our plantation at PT Kencana Sawit Indonesia (KSI), Sumatra. This is part of planned activities in support of our extended MoU with the Kalaweit Foundation.

One of the goals for the extension of the partnership is to release four more pairs of siamangs into a second HCV site, Bukit Salo in PT KSI. The aerial photos produced from the drones would aid in the initial assessment of the suitability and potential site of the area for the release of the siamangs. Meanwhile, one of the pairs of siamangs released in Bukit Tengah Pulau has produced an offspring, a positive sign for our rehabilitation efforts.

Agreement on Unified Approach to Implementing No Deforestation Commitments

The High Carbon Stock (HCS) Convergence working group comprises of palm oil companies, including Wilmar, NGOs, and other industry stakeholders. Its purpose was to agree on a single, coherent set of principles for the implementation of companies' "No Deforestation" commitments in their palm oil operations and supply chains.

Following a year of intensive work, the HCS Convergence working group announced on 8 November 2016, that an agreement had been reached. The group has developed recommendations that provide a roadmap for addressing issues that remain, in a collaborative and integrated way.

The recommendations will be incorporated into the revised HCS Approach Toolkit. In addition, the agreement will be reflected in the policies and positions of the organizations endorsing this agreement and the revised HCSA toolkit will be implemented by the companies when it is issued in early 2017.

More information can be found in the press release, available at this [link](#).

Financing Conservation within Oil Palm Plantations – Heart of Borneo Conference

The Heart of Borneo (HoB) is a tri-partied government initiative between Brunei, Malaysia and Indonesia with an aim to conserve the biodiversity of the HoB for the

benefit of the people who rely upon it, through a network of protected areas, sustainable management of forests and other sustainable land uses. This initiative was launched in 2007 and since then, Sabah has always organised an annual HoB Conference to provide a platform to highlight issues and to celebrate the success of this programme.

In this year's HoB Conference, Wilmar presented a paper entitled "Financing



Conservation within Oil Palm Plantation: Investment in Providing Potential Viable Habitat for Wildlife in Sabahmas Riparian Reserve" in the Conservation Finance session. The presentation aims to demonstrate oil palm companies, such as Wilmar, practicing sustainable oil palm production, can contribute towards the larger conservation goals within the landscape. Beyond providing social and environmental benefits, sustainable practices also helps the industry to mitigate risks and increase consumer confidence in company performance. A concerted effort with stakeholders will further increase the success in achieving sustainability and conservation goals.

Heart of Borneo Retreat

Wilmar also participated in the HoB retreat in November 2016 to outline a Conservation Finance and



Payment for Ecosystem Services (PES) Strategy for Sabah. This retreat was meant to provide a platform for participants to share information,

knowledge, views and ideas. Its main objective was to discuss the feasibility of the draft outline of a conservation finance and PES strategy for Sabah in terms of implementation and ease of securing external funding. This initiative, if successfully implemented, could potentially facilitate the jurisdictional certification initiative for the state of Sabah.

Atewa Living Waters' Private Sector Working Group – Visit to Atewa

The importance of the Atewa Forest Reserve is internationally recognised; it is part of the Guinean Forest Biodiversity hotspots, and is one of Ghana's high biodiversity significant areas. The forest also provides ecosystem services, such as serving as a watershed for three main rivers.

Wilmar's Benso Oil Palm Plantation (BOPP) is a member of the Atewa Living Waters' private sector working group, which seeks to conserve the Atewa Forest and protect the river basins it feeds. The working group is facilitating the establishment of a conservation plan for the Atewa Forest. On 18 and 19 November 2016, the group, including a Wilmar representative (Mr Edward Amankrah – Safety, Health & Environment Manager and a certified RSPO and ISO Lead Auditor), visited Atewa to engage with village chiefs and local communities, and to assess the state of the forest.

Policy Compliance

Grievance procedure, ART plan and progress on No Exploitation commitments

Grievance Procedure

Four new grievance cases were logged in Q4 2016.

Wilmar has had positive engagements with one of the suppliers in question, who has committed to halt land clearance while they conduct the necessary assessments in order to be in compliance with our No Deforestation, No Peat and No Exploitation (NDPE) policy. We have halted purchases from another supplier for failing to comply with our NDPE policy.

Two cases related to labour rights issues in the palm oil supply chain in Indonesia, and were raised by Wilmar following an NGO report. Wilmar welcomes the report, as it helps highlight labour issues within the wider palm oil industry, and catalyse concerted efforts required to resolve these issues. We have released a [statement](#) related to this report.

Wilmar has also provided a detailed update on the progress of addressing sustainability issues in the Leuser Ecosystem in Indonesia, a case which was first registered on our grievance list in January 2015. As part of our [Aggregator Refinery Transformation](#) (ART) programme for our facilities in North Sumatra, we have identified and conducted field assessments on high priority suppliers which included those operating in and around the Leuser Ecosystem. We have conducted 15 mill assessments, consolidated and summarised the findings into an anonymised report known as the "[Overarching Report](#)". The report was shared with all suppliers from that region in a workshop, which was held in Medan in October 2016. To address the problem holistically and at the landscape level, we have also been in discussions with NGOs and other palm oil companies operating in this landscape to address outstanding issues. In support of the

landscape approach, Wilmar is investing in TFT's monitoring technology, the Starling programme. Please see [our position statement](#) here for more details on this Collaborative Landscape Approach.

All stakeholders can follow our progress updates in handling these grievance cases through our [grievance procedure](#) on our sustainability dashboard.

Progress on Aggregator Refinery Transformation (ART)

As of end Q4 2016, we have completed 64 assessments covering mills in Indonesia, Malaysia, Latin America, and West Africa.

Sarawak, East Malaysia

We have completed the remaining mill assessments planned in 2016 in Q4, taking the total number of mill assessments done in Sarawak to seven. Work is in progress to prepare individual mill assessment report and the overarching report.

Indonesia

In Q4 the continued focus in Indonesia was on engaging with suppliers on details of mill assessment findings and the development of action plans. We have conducted 5 follow up meetings this quarter, taking place at both mill and headquarter levels to discuss findings of the field visits, and to establish action plans to improve practices and close gaps.

We had planned to conduct two broad-level engagement workshops in Indonesia in Q4 2016 and Q1 2017, to share key findings identified in the overarching report with suppliers. The first workshop was conducted on 31 October in Medan. TFT, Neste, and Wilmar were speakers at the workshop. The second workshop, scheduled in Jakarta, will be held in Q1 2017.



Collaboration to Find Solutions to Indonesian Palm Oil Sector Labour Challenges

Labour rights is a complicated issue in the palm oil industry in particular, because major producing countries are all developing nations. A collaborative effort is needed to identify, mitigate and address the root causes of labour rights issues on-the-ground.

Wilmar is constantly seeking ways to improve labour practices in the industry, particularly in Indonesia, where many legacy issues linked to land reform and transmigration often make resolution additionally complex.

After months of negotiations, our collaboration with Golden Agri-Resources and Business for Social Responsibility (BSR), a global non-profit organisation, was formally announced on 7 November 2016.

The collaboration will begin with a review of current labour practices in the palm oil sector in Indonesia, and is intended to formulate practical approaches to improving labour practices.

The BSR team has conducted field assessments in two of Wilmar's plantations in North Sumatra, PT Perkebunan Milano and PT Daya Labuhan Indah. The assessment methodology involved visual observations, interviews, focus group discussions, and documentation review. Over 100 employees, almost all of which non-management workers, were interviewed by BSR.

The full report by BSR will be delivered to Wilmar by end January 2017; details of the findings will be published in February 2017. Stakeholders will be kept updated on the progress and outcomes of this collaboration to improve labour rights.

Other Updates

Wilmar's HCV Assistant Manager Conferred the Outstanding Honorary Wildlife Ranger Award

Wilmar is the first plantation company to join the Honorary Game Warden Programme in Sarawak, East Malaysia. This programme empowers our staff to act against illegal activities, such as logging and poaching, in our conservation areas.

Forty of Wilmar's managers, staff and community representatives were appointed as Honorary Wildlife Rangers on 18 March 2015, by Datuk Amar Hj. Awang Tengah bin Ali Hasan, Sarawak's Second Minister of Resource Planning and Environment as well as Minister of Industrial Development and Minister of Public Utilities. Mr John Anak Alit, High Conservation Value (HCV) Assistant Manager at Wilmar's PPB Oil Palms Bhd (PPBOP) and one of the appointed rangers, was conferred the "Outstanding Honorary Wildlife Ranger" award by the Chief Minister of Sarawak in November 2016.



As observed by John, “since the establishment of PPBOP’s Honorary Game Warden Programme in Sarawak in March 2015, we have observed a reduction in encounters with poachers and people with guns moving into our conservation area.”

More information on the Honorary Game Warden Programme, and John’s work, is available at this [link](#).