



PACIFIC INTER-LINK GROUP GRIEVANCE TRACKER

(UPDATED 31 October 2023)

NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
1	12 June 2019	Mighty Earth – Rapid Response 1,14,15, 18, 19, 20, 23, 24 & 25	Indirect supplier – Anglo Eastern Plantation (AEP) through PT. Palmino, PT. Indopalm, AAA Oils & Fats (AAA) and Inter-Continental Oils (ICOF)	Alleged deforestation – PT Kahayan Agro Plantation (PT KAP), subsidiary of Anglo Eastern Plantation (AEP)	<ul style="list-style-type: none"> June 2019: PIL reached out to direct suppliers, PT. Palmino, PT. Indopalm, AAA Oils & Fats (AAA) and Inter-Continental Oils (ICOF). All suppliers were alerted about allegation against AEP, and PIL requested for their position on the grievance. June 2019: One of our direct suppliers shared clarification from AEP that the alleged concession was located out of HCV and HCS area. At the same time, AEP released and shared their sustainability policy which incorporated NDPE commitment. June 2019: AEP actively engaged with HCSA Committee Panel on the HCSA peer review for PT Kahayan Agro Plantation. Besides that, AEP stopped land clearing and issued temporary stop work order until the peer review process is completed. December 2019: HCSA peer review for PT KAP was completed and it is available here. February 2020: HCSA Secretariat found out that initial HCSA peer review declared the alleged area as Medium Priority Patch (MPP) was a mistake and immediately carried out an additional rapid review by new peer reviewer. May 2020: As result, the concerned area was declared as High Priority Patch (HPP) and upon HCSA request, the plasma area must be conserved or relocated. However, local community refuse to further delay the development of the plasma area. Therefore, PT KAP actively engaging with HCSA on this issue and stop work order still effective in place. February 2021: PT KAP concluded that HCS assessment and final peer review process have been completed. Based on the outcome, there are no important value within or outside the area to be cleared. Therefore, PT KAP decided to conserve the remaining plasma area (150 ha) as HCS area. (Refer to public announcement by AEP) 	Monitoring



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					<ul style="list-style-type: none"> January 2022: PIL have engaged with AAA Oils & Fats and they are satisfied with PT KAP's effort of conserving the remaining 150 ha plasma area. However, this position yet to be endorsed by HCSA Committee Panel. 	
2	12 June 2019	Mighty Earth – Rapid Response 15	Indirect supplier – Genting Plantation through Intercontinental Specialty Fats	Alleged deforestation – PT Citra Sawit Cemerlang, subsidiary of Genting Plantation	<ul style="list-style-type: none"> June 2019: PIL reached out to direct supplier, Intercontinental Specialty Fats (ISF). ISF was alerted about allegation against Genting Plantation and requested for their position on the grievance. June 2019: ISF reverted informing that they have stopped purchasing from Genting since December 2018. June 2019: ISF also shared response from Genting that there are no further land clearing done after 1 May 2019 (stop work order effective date). June 2019: Our direct supplier will be monitoring the case and its implementation plan. PIL to monitor through the direct supplier's grievance tracker. August 2019: In recent meeting with our direct supplier, they confirmed that they have stopped sourcing from Genting and therefore the grievance is closed. August 2019: Consequently, PIL also considers the grievance closed as Genting is no longer in our supply chain via ISF. 	Closed
3	12 June 2019	Mighty Earth – Rapid Response 15	Indirect supplier – Genting Plantation through Intercontinental Specialty Fats	Alleged deforestation – PT Permata Sawit Mandiri, a part of Genting Plantation	<ul style="list-style-type: none"> June 2019: PIL reached out to direct supplier, Intercontinental Specialty Fats (ISF). ISF was alerted about allegation against Genting Plantation (GP) and response was requested regarding their position on the grievance. June 2019: ISF reverted informing that they have stopped purchasing from GP since December 2018. June 2019: ISF also shared response from GP that in March 2017, GP announced that they had disposed its 95% equity interest in PT Permata Sawit Mandiri to PT Suryaborneo Mandiri. (Refer to GENP Sustainability Report 2019) 	Closed



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					<p>Following the disposal, Genting ceased to have any effective interest in PT Permata Sawit Mandiri.</p> <ul style="list-style-type: none"> June 2019: Our direct supplier will be monitoring the case and its implementation plan. PIL to monitor through the direct supplier's grievance tracker. August 2019: In recent meeting with our direct supplier, they confirmed that they have stopped sourcing from Genting and therefore the grievance is closed. August 2019: Consequently, PIL also considers the grievance closed as Genting is no longer in our supply chain via ISF. 	
4	12 June 2019	Mighty Earth – Rapid Response 7, 10, 11, 12, 15, 16, 17	Indirect supplier –PT. Hamita Utama Karsa (Indonusa Group) through AAA Oils & Fats	Alleged deforestation – PT Internusa Jaya Sejahtera, under Indonusa	<ul style="list-style-type: none"> June 2019: PIL reached out to direct supplier, AAA Oils and Fats. AAA was alerted about allegation against PT. Hamita Utama Karsa under Indonusa Group (IG) and response was requested regarding their position on the grievance. June 2019: AAA shared the recommendations of stop land clearing and carry out HCV-HCS Assessment before conduct any land clearing with IG. <p>Although IG agreed with the recommendations by AAA, however, AAA has stop sourcing from IG until the resolution of the matter. (Refer to AAA's grievance tracker)</p> <ul style="list-style-type: none"> August 2019: PIL considers this grievance closed. 	Closed



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5	12 June 2019	Mighty Earth – Rapid Response 15	Indirect supplier – Perkebunan Nusantara (PN) through PT. Palmindo	Alleged deforestation – PT Perkebunan Nusantara II Prafi (PTPN II)	<ul style="list-style-type: none"> June 2019: PIL reached out to PT Palmindo and was alerted about allegation against Perkebunan Nusantara. A response was requested regarding their position on the grievance. July 2019: PT Palmindo shared a clarification letter from PTPN II that the alleged plantation, Prafi was sold to PT. Yongjing Investindo in 2014. Therefore, PTPN II denies any responsibility of any activities carried in Prafi. August 2019: PIL considers this grievance closed. 	Closed
6	12 June 2019	Mighty Earth – Rapid Response 5, 15, 18, 20 Chain Reaction Ref - April 2020	Indirect supplier – TH Plantations (THP) through Pacific Oils and Fats (PACOIL)	Alleged deforestation - Ladang Tabung Haji, under TH Plantations (THP)	<ul style="list-style-type: none"> June 2019: PIL reached out to direct supplier, PACOIL and was alerted about allegation against THP and a response was requested regarding their position on the grievance. June 2019: PACOIL confirmed that their supply chain does not involve the alleged concession and shared clarification from THP. June 2019: THP clarified that the alleged concession no longer belongs to them. THP also shared an excerpt of minutes of their Shareholders meeting held on 30/01/2008 pertaining to the sale of the estates – Ladang Semilajau and Ladang Sebauh. October 2020: PACOIL again engaged with THP to request further information pertaining to the sale of the estates – Ladang Semilajau and Ladang Sebauh. October 2020: THP replied that these two estates (Ladang Semilajau and Ladang Sebauh) belong to Ladang Sawit Bintulu Sdn Bhd (LSB) and LSB is 100% owned by TH (Sabah & Sarawak) Sdn Bhd (THLSS) in turn wholly owned by Lembaga Tabung Haji (LTH). <p>THP only provided management services to LTH for managing oil palm estates including Ladang Semilajau and Ladang Sebauh.</p> <p>In June 2008, LSB ceased all its properties including (Ladang Semilajau and Ladang Sebauh) to Semai Mekar Sdn Bhd which is 100% owned by Tamaco Plantation Sdn Bhd,</p>	Closed

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					<p>THP acquired LSB as a dormant company in April 2009. (Bursa Malaysia)</p> <ul style="list-style-type: none"> October 2020: PIL considers this grievance closed as these two estates (Ladang Semilajau and Ladang Sebauh) no longer belongs to THP since 1 June 2008. 	
7	8 July 2019	Mongabay – Orangutan Habitat Loss and Palm Mills Report compiled by Maphubs	Indirect supplier – Ahmad Zaki Resources through AAA Oils & Fats	Alleged deforestation – PT Ichtiar Gusti Pudi	<ul style="list-style-type: none"> July 2019: PIL reached out to direct supplier, AAA Oils and Fats. AAA was alerted about allegation against PT Ichtiar Gusti Pudi and response was requested regarding their position on the grievance. July 2019: AAA Oils and Fats confirmed that their last trade with PT Ichtiar Gusti Pudi was in 2018, therefore it is not found in PIL's supply chain. August 2019: PIL's follow-up meeting with direct supplier confirmed that the alleged deforestation did not take place on the concession mentioned. August 2019: As there was no further response from complainant, PIL considers the grievance closed. 	Closed
8	18 July 2019	Mighty Earth – Rapid Response 17	Indirect supplier – Kencana Agri Ltd. (KAL) through AAA Oils & Fats (AAA)	Alleged deforestation – PT. Agro Sawit Mas Lestari (PT ASML)	<ul style="list-style-type: none"> July 2019: PIL reached out to AAA and was alerted about allegation against PT ASML and a response was requested regarding their position on the grievance. August 2019: AAA provided clarification received from KAL that the alleged land clearing is located outside of PT ASML's concession. (Refer to the illustration overlay map here) August 2019: AAA will be monitoring the case and PIL to monitor through the direct supplier's grievance tracker. August 2019: AAA classified that this grievance case as closed. Refer to AAA's grievance tracker. <p>This case no longer appeared in Mighty Earth Rapid Response Report 17.</p>	Closed

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9	18 July 2019	Mighty Earth – Rapid Response 17	Indirect supplier – Makin Group (MG) through AAA Oils & Fats (AAA)	Alleged peat forest development – PT. Mekar Karya Kahuripan (PT MKK) under Makin Group	<ul style="list-style-type: none"> July 2019: PIL reached out to AAA and was alerted about allegation against PT MKK and a response was requested regarding their position on the grievance. August 2019: AAA provided clarification received from MG to PIL. MG denied the allegation of land clearing stated in the report and informed that the management has stopped all PT MKK's business activities since 15 September 2016 as per stated in the Notary Act No 12/2016. June 2020: AAA informed PIL that following further engagement with Mighty Earth on the evidence, this matter has been resolved to Mighty Earth's satisfaction and classified as closed. Refer to AAA's grievance tracker. 	Closed
10	18 July 2019	Mighty Earth – Rapid Response 17	Indirect supplier – Sumber Tani Agung Group (STA) through AAA Oils & Fats (AAA)	Alleged deforestation and clearance prep / stacking line – PT. Tantahan Panduhup Asi (PT TPA)	<ul style="list-style-type: none"> July 2019: PIL reached out to AAA and was alerted about allegation against PT TPA and a response was requested regarding their position on the grievance. August 2019: AAA informed PIL that the alleged land clearing is located outside of PT TPA's concession (Overlay map) and clarified that PT TPA has conducted HCV and HCS by independent assessor - Aksenta. August 2019: AAA will be monitoring the case and PIL to monitor through the direct supplier's grievance tracker. June 2020: AAA informed PIL that this case has been classified as closed by Mighty Earth and has been removed from the Rapid Response 17. Refer to details in AAA's grievance tracker. 	Closed

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11	18 July 2019	Mighty Earth – Rapid Response 17	Indirect supplier –PT. Asian Agro Lestari (PTAL), (RGE Group) through AAA Oils & Fats ((AAA)	Alleged peat forest development and clearance prep / stacking line – PT. Usaha Sawit Unggul (PT USU) under Royal Golden Eagle Group (RGE)	<ul style="list-style-type: none"> July 2019: PIL reached out to AAA and was alerted about allegation against PT. USU. A response was requested on their position on the grievance. August 2019: AAA informed PTAL had commenced an investigation and based on the evidence received, PTAL confirmed that the land clearing is located outside of PT USU's concession. (Refer to the illustration map here) June 2020: AAA informed PIL they have classified this case as closed. Refer to AAA's grievance tracker. 	Closed
12	18 July 2019	Mighty Earth – Rapid Response 17	Indirect supplier – Tradewinds Plantation (TP) through Inter-Continental Oils and Fats Pte. Ltd. (ICOF)	Alleged deforestation of PT Kurun Sumber Rezeki (PTKSR) a joint venture between Jholin Group and CB industrial Product Holding Bhd (CBIP). CBIP are the joint venture of Tradewind Plantation, Solar Green Sdn. Bhd (SGSB) and	<ul style="list-style-type: none"> July 2019: PIL reached out to ICOF and was alerted about allegation against SGSB and Kumpulan KJSB and TP joint venture relationship with CBIP. A response was requested regarding their position on the grievance. August 2019: ICOF informed that TP have joint ventures with CBIP. However, TP and CBIP are two separate legal entities and therefore TP does not have any direct share or management control over both CBIP and vice versa. ICOF does not commenced any business relationship with CBIP and PTKSR but TP. <p>ICOF also shared that although CBIP holds 30% share in KKJSB, KKJSB is fully managed by TP, and CBIP does not have management control over KKJSB. Furthermore CBIP also only holds 50% indirect shares in SGSB, which is under the management of TP. As such, both PTKSR and CBIP are not part of PIL supply chain.</p> <ul style="list-style-type: none"> June 2020 ICOF informed PIL that this case has been classified as resolved. Refer to ICOF's grievance tracker . 	Closed

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				Kumpulan Kris Jati Sdn.		
13	18 July 2019	Mighty Earth – Rapid Response 17	Indirect supplier – Triputra Agung Persada (TAP) through PT. Indopalm	Alleged NDPE non-compliant sources – TAP subsidiaries, PT Etam Bersama Lestari (PT. EBL) and PT Dwiwira Lestari Jaya (PT DLJ) alleged to be sourcing from Kirana Megatara (KM) which owned PT Putra Katingan Pratama that alleged with deforestation	<ul style="list-style-type: none"> July 2019: PIL reached out to direct supplier, PT. Indopalm. PT. Indopalm was alerted about allegation TAP subsidiaries, PT. EBL and PT DLJ and response was requested regarding their position on the grievance. August 2019: Indopalm reached out to TAP for clarification about sourcing from Kirana Megagin and then shared the response from TAP to PIL. August 2019: TAP responded that TAP and KM are two separate holding companies with different business domain. TAP is an oil palm plantation group and KM is a rubber processor group. <p>Therefore, TAP has no control and/or management influences over KM or vice-versa.</p> <p>It was also noted that CPO supplies to Pacific Indopalm Industries come from PT Brahma Binabakti in Jambi, not from PT. EBL or PT Dwiwira, East Kalimantan.</p> <ul style="list-style-type: none"> August 2019: Therefore, PIL's supply chain does not include sources from KM and the grievance is considered closed. 	Closed
14	13 August 2019	Mighty Earth – Rapid Response 18	Indirect supplier – KLK Berhad through Keck Seng (M) Berhad (KSMB)	Alleged peat development – PT Menteng Jaya Sawit Perdana (PT MJSP)	<ul style="list-style-type: none"> August 2019: PIL reached out to direct supplier, KSMB and was alerted about peat development done by PT MJSP and a response was requested regarding their position on the grievance. August 2019: KSMB responded that KLK has addressed to this grievance on their website. The alleged area had been gazette by Kementerian Lingkungan Hidup & Kehutanan 	Closed

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					<p>["KLHH"] (attached letter) as Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area.</p> <p>KLK Berhad grievance tracker is provided for further reference. Refer to G06, the grievance case has been removed from Mighty Earth's Rapid Response Report 18.</p>	
15	13 August 2019	Mighty Earth – Rapid Response 18	Indirect supplier – TH Plantations Berhad (THP) through Keck Seng (M) Berhad (KSMB)	Alleged peat development – TH Pelita Meludam Sdn Bhd (THPM), subsidiary of TH Plantations Bhd	<ul style="list-style-type: none"> • August 2019: PIL reached out to direct supplier, KSMB and KSMB was alerted about peat development done by THPM and a response was requested regarding their position on the grievance. • August 2019: KSMB shared the response from THP that the alleged area is not located within their estate's boundary. • June 2020: KSMB also shared the map provided by THPM, pointing that the land clearing area is outside of THPM estate's boundary. 	Closed
16	13 August 2019	Mighty Earth – Rapid Response 18	Indirect supplier – Pinehill Pacific Bhd (PPB) through PT Golden Hope Nusantara (PT GHN)	Alleged deforestation – PT Makmur Jaya Malindo (PT MJM)	<ul style="list-style-type: none"> • August 2019: PIL reached out to PT GHN and was alerted about deforestation done by PT MJM and a response was requested on their position regarding the grievance. • August 2019: PT GHN shared the response received from PPB. Based on PT GHN investigation, it was found that the clearing attributed to PT MJM is actually in PPB's PT Indomal Sawit Jaya (PT. IJS) estate. According to PT GHN's monitoring, the area cleared is an industrial tree plantation and they are continuously monitoring the case. • August 2019: PT GHN confirmed that their supply chain does not involve the alleged concession, PT MJM and also PT. IJS. • June 2020: Sime Darby Group (SDG) clarified that PT MJM is not specifically in their supply chain, however a previously affiliated mill called Benta (Perak) Plantation (BPP) is. PPB had since disposed of BPP mill in 3Q 2019. Therefore, PT GHN is no longer in SDP's supply chain. Refer to SDG's grievance tracker . 	Closed



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17	13 August 2019	Mighty Earth – Rapid Response 18	Indirect supplier – Tradewinds Plantations Berhad (TP) through Inter-Continental Oils and Fats Pte. Ltd. (ICOF)	Alleged deforestation and peat forest development – Trans Kenyaland Sdn Bhd (TK), subsidiary of Tradewinds Plantations Bhd	<ul style="list-style-type: none"> • August 2019: PIL reached out to ICOF and was alerted about deforestation and peat forest development done by TK and a response was requested on their position regarding the grievance. • August 2019: ICOF reached out to TP and TP responded with an official letter dated on 19 Aug 2019. TP clarified that TK comprises of both Lingga 1 & Lingga 2 estates and have submitted evidence to show that the alleged land development was outside the TK's two estates, Lingga 1 and Lingga 2. <p>ICOF have internally verified the evidence and confirmed that the clearing was outside the two estates.</p> <ul style="list-style-type: none"> • June 2020 ICOF clarified that this case has been resolved. Refer to ICOF's grievance tracker . 	Closed

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18	10 September 2019	Mighty Earth – Rapid Response 19	Direct supplier –Sime Darby Plantation Berhad (SDP)	Alleged deforestation – Derawan, SOU 33 under Sime Darby Plantation Bhd	<ul style="list-style-type: none"> September 2019: PIL reached out to direct supplier, SDP on the report that there are alleged deforestation in their concession. Clarification was requested from SDP on the alleged deforestation activity claimed to have taken place in Derawan, SOU 33. September 2019: SDP responded to PIL that they have conducted an internal investigation and concluded that the clearing is not in their plantation area. SDP further clarified that the clearing is about 100 meters away from the boundary of their operations. Third parties not associated with SDP appear to be clearing for both oil palm and durian estates. SDP shared details of their findings through a press statement. December 2019: The RSPO has now published the boundaries of Sime DDP's concessions in Sarawak, which includes Derawan SOU 33 area. Following further engagement with Mighty Earth regarding the issue of the concession boundary, this matter has been resolved to Mighty Earth's satisfaction. 	Closed
19	6 November 2019	Mighty Earth – Rapid Response 21	Indirect supplier – Makin Group (MG) through AAA Oils & Fats (AAA)	Alleged deforestation – PT Cipta Karsa Kahuripan (PT CKK), a part of Makin Group	<ul style="list-style-type: none"> December 2019: PIL reached out to direct supplier, AAA and was alerted about allegation against PT CKK and response was requested regarding their position on the grievance. December 2019: AAA provided clarification that received from MG to PIL. MG clarified that PT CKK do not own location permit for the concession mentioned in the report and the company had been frozen since Sept 2016. PT CKK further explained that it did received an offer of the land from Ketapang District in June 2015, but it did not act on the offer. According to a letter from Ketapang District, the land offer will be cancelled if there is no follow up actions by PT CKK within six months of issuance letter. 	Closed

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					<p>As PT CKK / Makin never conducted any activities on the land. Therefore, the offer is no longer valid and they do not own or manage the concession.</p> <p>PT CKK has sent an official letter to Bupati Ketapang to inform that no activities conducted in the land including the pre-survey as required.</p> <p>AAA received a copy of the letter including the land offer by Bupati Ketapang.</p> <ul style="list-style-type: none"> December 2019: AAA will be monitoring the case and PIL to monitor through the direct supplier's grievance tracker. June 2020: AAA informed PIL the case has been closed. Following further engagement with Mighty Earth on the evidence, this matter has been resolved to Mighty Earth's satisfaction. 	
20	6 December 2019	Mighty Earth – Rapid Response 22	Indirect supplier – Sampoerna Agro (SA) through PT. Indopalm	Alleged deforestation – PT Usaha Agro Indonesia (PT UAI), a part of Sampoerna Agro Group (SA)	<ul style="list-style-type: none"> December 2019: PIL reached out to direct supplier, PT. Indopalm and alerted about allegation against PT UAI and response was requested on their position regarding the grievance. December 2019: PT Indopalm engaged with SA on alleged report against PT UAI. December 2019: SA clarified that the alleged is not deforestation but fire on the land that belongs to villager in their concession. <p>SA also informed that the ownership title has yet to be transferred to the company since villagers refused to be compensated.</p> <p>A report of the fire was shared by SA to PT Indopalm, in turn shared to PIL.</p> <ul style="list-style-type: none"> May 2021: SA informed PT Indopalm that the fire caused by villagers is only 2 ha. The balance 82 ha is manual land clearing for their housing and farming needs. 	Closed

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					<p>PT Indopalm requested concession map from UAI to ensure the fire and manual land clearing took place out of UAI's concession.</p> <ul style="list-style-type: none"> January 2022: PT Indopalm has engaged with RSPO to verify the fire incident area against the concession map in GeoRSPO. The alleged area is found to be within concession and PT Indopalm has requested an explanation from the supplier. There is also a separate RSPO investigation on this allegation. March 2022: RSPO responded to PT. Indopalm that the fire incident is not for land clearing or palm oil planting purposes. However, the motive of the fire is under further investigation by RSPO. August 2022: RSPO confirmed that the fire incident was not initiated by PT UAI. 	
21	6 December 2019	Mighty Earth – Rapid Response 22 & 23, 26, 27 & 28	Indirect supplier – Bumitama Group through Inter-Continental Oils and Fats Pte. Ltd. (ICOF)	Alleged peat forest clearance – PT Damai Agro Sejahtera (PT DAS), subsidiary of Bumitama Group (BG)	<ul style="list-style-type: none"> December 2019: PIL reached out to direct supplier, ICOF. ICOF was alerted about peat forest clearance done by PT DAS and response was requested regarding their position on the grievance. December 2019: ICOF verbally updated during supplier engagement that Bumitama Group has responded to them with a letter. <p>Bumitama also notified that it is not peat forest clearance but a fire that has taken place.</p> <p>ICOF has yet to respond formally on this grievance, due to on-going discussion with Bumitama Group.</p> <ul style="list-style-type: none"> December 2019: Bumitama published a news release to clarify that the forest fire happened at the alleged area during the dry season in September 2019. <p>The fire mostly impacted the community farmland areas and the conservation areas of forested land. However, Bumitama Group decided to rehabilitate the conservation areas burnt within PT DAS under Bumitama Biodiversity and Community Project (BBCP).</p>	Closed

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					<ul style="list-style-type: none"> June 2020: ICOF informed PIL that this case has been classified as resolved. Refer to details in ICOF's grievance tracker. 	
22	8 January 2020	Mighty Earth – Rapid Response 23	Direct supplier – Inter-Continental Oils (ICOF)	Alleged deforestation – PT Andalan Sukses Makmur (PT ASM), subsidiary of Bumitama Group (BG)	<ul style="list-style-type: none"> January 2020: PIL reached out to ICOF and was alerted about deforestation done by PT ASM and a response was requested on their position regarding the grievance. January 2020: ICOF informed that they are still waiting for response from Bumitama Group (BG). January 2020: BG declared that the alleged area has been set-aside as conservation area according to the rapid HCS assessment and peat delineation study conducted in April 2014. (Refer to BG's News Release on 12 September 2014). <p>Unfortunately, the conservation areas has been impacted by the fire during dry season happened in September 2019 and this incident has been reported to local authorities and RSPO.</p> <p>BG planned to conserve the fire impacted areas but due to management permit, the local community own the areas. BG has taken action to communicate with the local community in their conservation plan and BG's Sustainability Policy.</p> <ul style="list-style-type: none"> June 2020: ICOF informed PIL that this case has been classified as resolved. Refer to details in ICOF's grievance tracker. 	Closed
23	11 March 2020	-	Direct supplier – PT Pacific Indopalm	Alleged deforestation – PT Dutapalma Nusantara (PT DN) Darmex Agro (DA)	<ul style="list-style-type: none"> March 2020: PIL reached out to direct supplier PT Indopalm and was alerted about alleged deforestation done by PT. DN/DA. A response was requested on their position on the grievance. PT Indopalm clarified that they have suspended trade with PT. DN/DA with immediate effect and will engage with them on their poor sustainability credentials. June 2020: Indopalm has officially informed PIL that they have ceased purchase from PT. DN/DA. 	Closed

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24	15 October 2018	Environmental Investigation Agency (EIA) & Greenpeace RSPO/2018/18/RB	Pacific Inter-Link Sdn Bhd, Pacific Oils & Fats Industries Sdn Bhd PT. Pacific Indopalm Industries PT. Pacific Medan Industri PT. Pacific Palmindo Industri	The complaint being made is that all five RSPO member companies referred to, are in violation of the RSPO Group Membership rule that all members had to comply with by 6th March 2017, as they are all part of the Hayel Saeed Anam (HSA) Group, but still have separate RSPO membership. The five companies became RSPO members between May	<ul style="list-style-type: none"> • October 2018: Complaint submitted to RSPO Secretariat. • February 2019: PIL made its submissions. • February 2019: PIL's submission shared with complainants for comments. • March 2019: PIL in continuing engagement with RSPO Secretariat. • October 2020: RSPO Complaints Panel is satisfied following the due diligence undertaken by the Secretariat Membership Department and the companies named in the complaint have consolidated under the group membership of Commodities House Investment Ltd. The complaint has been dismissed, however, the complainant may lodge an appeal to RSPO secretariat within 60 days. • January 2021: The Complainant has appealed the decision from RSPO Complaints Panel (CP). According to Complaints and Appeals Procedures, an appeal panel has been formed. • April 2021: Appeal Panel (AP) decided to return the case to RSPO CP for further investigation after considering Appellant's concerns as follows: <ul style="list-style-type: none"> a. List of companies under Commodities House Investment also listed under Hayel Saeed Anam Group (HSA)'s website b. Pacific Inter-Link Sdn Bhd (PIL)'s social media shows the contact link to HSA c. CP's decision did not address the relationship between HSA and PIL. d. New evidence of Transworld Oils and Fats Ltd (TOFL) linked to PIL. • August 2021: The RSPO Complaints Desk will follow up with the Complainant for additional supporting evidence regarding the corporate link between HSA and the Respondents Companies. 	Closed

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				2009 and August 2014.	<ul style="list-style-type: none"> January 2022: Secretariat reviewing the additional document received from the complainant. June 2022: Secretariat has submitted a briefing note to the RSPO CP and pending for their consideration. August 2022: Secretariat has decided to close the case upon considering the notes from RSPO CP. (Please refer to RSPO Website)	
25	15 October 2018	Mighty Earth – Rapid Response 5 & 23 Environmental Investigation Agency (EIA) & Greenpeace RSPO/2018/19/RB	Pacific Inter-Link Sdn Bhd, Pacific Oils & Fats Industries Sdn Bhd PT. Pacific Indopalm Industries PT. Pacific Medan Industri PT. Pacific Palmino Industri	Violation of the RSPO Code of Conduct because of PIL's alleged involvement in control/ownership and operational development of four palm oil plantation companies in Papua. The allegation states PT Megakarya Jaya Raya, controlled by the HSA	<ul style="list-style-type: none"> October 2018: Complaint submitted to RSPO Secretariat. February 2019: PIL made its submissions. February 2019: PIL's submission shared with complainants for comments. March 2019: PIL drafted Non-Disclosure Agreement (NDA) and requested complainants to sign in order to exchange documents. June 2019: PIL communicated with RSPO Secretariat on concerns around confidentiality of the documents and agreed to share documents approved by PIL's management team. July 2019 – Feb 2020: RSPO Secretariat prepared the confidentiality of document's briefing note. March 2020 – May 2020: Briefing note has been drafted and submitted to Complaints Panel for deliberation. July 2020: The Complaints Panel has directed on the issue of confidentiality, and RSPO Secretariat requested both parties to cooperate, in order to proceed with the complaint procedure. 	Engaged

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				<p>Group, has cleared an estimated 4,000 ha of forest for oil palm plantations in Papua. The RSPO members are based in Malaysia and Indonesia, and the complaint involves their involvement in four plantation companies in Papua- - PT Megakarya Jaya Raya (PT MJR), Fofi/Jair Districts, Boven Digoel, Papua, Indonesia - PT Kartika Cipta Pratama (PT</p>	<ul style="list-style-type: none"> • September 2020: Complainants offered an undertaking of confidentiality which was communicated to PIL. • November 2020: After due consideration, PIL found the undertaking of confidentiality not adequate and communicated the same to the Complaints Panel (CP) • January 2021: CP wrote to Membership Department to commence due diligence • March 2021: Membership Department has completed due diligence and shared the initial findings with CP while preparing the full report. • April 2021: The Complaints Desk has received a short report from the membership unit and midst of reviewing the report. • August 2021: The RSPO Complaints Desk will follow up with the Complainant for additional supporting evidence regarding the corporate link between HSA and the Respondents Companies. • January 2022: Secretariat reviewing the additional document received from the complainant. • June 2022: The investigation will be handed over to an independent consultant and the Secretariat is in the process of drafting out Terms of Reference (ToR) for the investigation. • July 2022: ToR is in the process of peer review. • November 2022: ToR has been approved by CP and will be shared with complainant and respondent for their feedback. <p>Refer to RSPO Website.</p>	



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				<p>KCP), Fofi/Jair Districts, Boven Digoel, Papua, Indonesia - PT Energi Samudera Kencana (PT ESK), Mandobo/Fofi/Jair Districts, Boven Digoel, Papua, Indonesia - PT Graha Kencana Mulia (PT GKM), Fofi/Jair Districts, Boven Digoel, Papua, Indonesia</p>	<ul style="list-style-type: none"> June 2023: An independent consultant has been appointed for investigation and the draft report is reviewed by CP. October 2023: The decision letter is published at RSPO's website. The case is dismissed due to insufficient evidence to support the allegation made by EIA & Greenpeace. 	
26	March 2020	Chain Reaction Ref – March 20, 2019	Indirect supplier – Prosper Group through Pacific Oils & Fats (PACOIL) Industries Sdn Bhd	Deforestation – Prosper Group (PG)	<ul style="list-style-type: none"> March 2020: PIL reached out to direct supplier PACOIL and was alerted about deforestation done by The Tee family who is shareholder of Prosper Group (PG) and associated with The Bewani Oil Palm Project. Bewani is an investment of the Tee family. March 2020: PIL researched on PG's efforts and consulted with industry players. PIL also engaged directly with Prosper Group. 	Monitoring



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					<p>Action by PG since 2019-</p> <ul style="list-style-type: none"> • Feb 2019: Divested Bewani Oil Palm Plantation Ltd (BOPPL) • June 2019: PG published a group wide NDPE policy and engaged Earthworm Foundation to develop a remediation and compensation plan; and implement the NDPE policy. • October 2019: PG revised its sustainability policy. • March 2020: PG established a partnership with Global Environment Centre (GEC). PG is financing a Recovery Project in the form of long-term conservation initiative to be undertaken by GEC in a portion of the North Selangor Peat Swamp Forest (NSPSF) at Selangor State. (Refer to the Prosper Conservation and CSR) • May 2020: PG provided PIL an official confirmation that Top Leap Holdings Limited, a company incorporated in the British Virgin Islands, had purchased BOPPL in the first quarter of 2019. Prosper has engaged an international accounting firm to verify and confirm the divestment of BOPPL and alluded that the exercise will take two months to complete. • August 2020: PG has finished evidence of divestment of BOPPL. • November 2020: PG shared a summary progress report of the conservation project. Pacoil will continue monitor the progress of the conservation project and engaged with PG if necessary. • April 2021: PG shared progress on conservation project as summarized below: <ul style="list-style-type: none"> a. To assess location and scale of degradation in the identified forest compartment areas b. Rehabilitation process through rewetting, natural regenerating and selected planting c. Stakeholder and local community engagement 	

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					<p>Kindly refer the summary progress report of the conservation project (October 2020 to April 2021).</p> <ul style="list-style-type: none"> • May 2021: In a follow-up engagement with PACOIL: <ul style="list-style-type: none"> a. PG assured that the conservation project will be equivalent to the liability area of Bewani project. b. There is no outstanding concerns with respect to the divestment of Bewani project by the Tee family • December 2021: PG shared with Pacoil that they are updating the progress on the recovery project at NSPSF every six months at their website. • July 2022: Prosper provided a report on the update of recovery project at Bukit Belata (Ext.) Forest Reserve at NSPSF. Pacoil will continue to monitor Prosper's progress in this recovery project. 	
27	April 2020	Chain Reaction Ref – April 9 2020	Indirect supplier – Tabung Haji Plantation Bhd through Pacific Oils & Fats (PACOIL) Industries Sdn Bhd	Alleged deforestation - Deru Semangat Sdn Bhd, related to Tabung Haji Plantations (THP)	<ul style="list-style-type: none"> • April 2020: PACOIL reached out to THP and was alerted about deforestation done and response was requested regarding their position on the grievance. • April 2020: THP informed that they entered into a Management Agreement with Deru Semangat Sdn Bhd (DSSB) to manage their palm oil plantation. THP informed that they are merely acting as a management agent and not the owner. • April 2020: THP informed that their new management has terminated the Management Agreement with DSSB in March 2020 and now finalizing the agreement and documentation. • June 2020: THP officially informed PACOIL that the finalization documentation on the termination of the Management Agreement will be handed over in July 2020. 	Engaged



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					<ul style="list-style-type: none"> • October 2020: PACOIL reminded THP to provide evidence of termination of Management Agreement with DSSB. THP shared with PACOIL that DSSB is a joint venture between Lembaga Tabung Haji with Royal Family Pahang, and THP only provided management services. • November 2020: THP updated PACOIL on the following: <ul style="list-style-type: none"> a. LTH issued moratorium to cease all deforestation activities by DSSB with effect from October 2020. b. THP revised Sustainability Policy incorporated with NDPE Commitment in November 2020. c. Full termination of management services is expected by end of Year 2020. • January 2021: THP has terminated management agreement with DSSB, which will be effective from 15 January 2021. • March 2021: THP has agreed with liability area with another buyer and will present it to their board for approval. The tentative liability area is 4126 ha. • June 2021: Pending to sign agreement between TH, THP and GEC • August 2021: THP has completed signing MOU with GEC. GEC will conduct the preliminary preparations and the Recovery Plan Project (RPP) is expected to commence within six months' time from MOU. • December 2021: THP is expecting to sign agreement on preliminary works by GEC in January 2022. THP promised to update on the progress of the RPP. • July 2022: THP responded that the RPP is being drafted and will be shared once it has been finalized by their management. 	

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					<ul style="list-style-type: none"> December 2022: THP has signed agreement with GEC for a seven years RPP at northeast Gunung Arong Forest Reserve (GAFR) in Mersing, Johor for a rehabilitation of 4,300 ha of peat swamp and lowland forest. The RPP work is expected to commence in January 2023. January 2023: THP has provided an update on the RPP for the second half of 2022, and highlighted work plan for 2023. They will be providing half yearly report on the progress made at GAFR 	
28	October 2019	Mighty Earth – Rapid Response 20	Direct supplier - AAA Oils and Fats Pte Ltd	Alleged deforestation – PT Makmur Bersama Asia (PT MBA), under Sin Tek Huat Group (STH)	<ul style="list-style-type: none"> October 2019: Pacific Inter-Link Sdn Bhd (PIL) had engaged with direct suppliers, AAA Oils and Fats Pte Ltd on their position regarding the grievance. AAA shared with PIL that the land clearing occurred outside PT Makmur Bersama Asia's (PT MBA) concession, and the land belongs to local community. December 2019: Furthermore, AAA has conducted desktop analysis to confirm the land clearing is not within the concession area and therefore AAA has closed the case. Kindly refer to Apical's grievance tracker. 	Closed
29	October 2019	Mighty Earth – Rapid Response 20	Indirect supplier – Felda Global Venture (FGV) through IOI Pan Century Edible Oils Sdn Bhd (IOI), Inter-Continental Oils & Fats Pte Ltd (ICOF) and Mewah Oils Pte Ltd (MG)	Alleged deforestation - PT Citra Niaga Perkasa (PT CNP) subsidiary of Felda Global Ventures (FGV)	<ul style="list-style-type: none"> October 2019: Pacific Inter-Link Sdn Bhd (PIL) had engaged with our direct suppliers, IOI Pan Century Edible Oils Sdn Bhd (IOI), Inter-Continental Oils & Fats Pte Ltd (ICOF) and Mewah Oils Pte Ltd (Mewah) on the allegation against PT Citra Niaga Perkasa for deforestation. January 2020: It was shared with PIL on the clarification from Felda Global Ventures (FGV) that the cleared area belongs to local community for paddy planting since June 2019 and FGV had reiterate stop work order since May 2017. Kindly refer the clarification from FGV. 	Closed

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30	August 2020	Mighty Earth – Rapid Response 30	Indirect supplier – Amanah Saham Pahang (ASPA) through Bunge Loders Crocklaan (BLC), Mewah Group (MG), Keck Seng (M) Berhad (KS), Sime Darby (SD) and IOI Group (IOI)	Alleged deforestation - Berabong Estate under Amanah Saham Pahang (ASPA) and Mentiga Corporation Bhd (MCB) – Area A and Area B	<ul style="list-style-type: none"> • August 2020: PIL has engaged with direct suppliers (Bunge Loders Crocklaan (BLC), Mewah Group, Keck Seng (M) Berhad, Sime Darby and IOI Group) on the allegation against Mentiga Corporation Bhd (MCB) and Berabong Estate, both subsidiaries of Amanah Saham Pahang (ASPA), for deforestation. • August 2020: BLC insisted its suppliers to secure the following commitments from ASPA: <ol style="list-style-type: none"> i) A moratorium on further land clearing ii) NDPE iii) A recovery plan to address liability for deforestation • September 2020: ASPA presented Sustainability Policy which includes NDPE commitment and imposed moratorium on new land development. <p>At the same time, Global Environment Centre (GEC) has been invited to a potential conservation and rehabilitation project to ASPA and positive response has been achieved. Next, GEC will organize a site visit with ASPA. (Please refer to BLC's grievance tracker for ASPA policy)</p> <ul style="list-style-type: none"> • May 2021: SD informed PIL that they are actively engaging with ASPA through third party trader and will update on the possible conservation and rehabilitation project. • October 2021: GEC has proposed the potential conservation project to ASPA in September 2021. The proposed project is to be approved by the Board of Directors of ASPA. 	Engaged
31	August 2020	Mighty Earth – Rapid Response 30	Indirect Supplier YP Plantation Sdn Bhd (YPP) through Pacific Oils & Fats Industries Sdn Bhd	Alleged peat development - YP Plantation Holdings Sdn Bhd	<ul style="list-style-type: none"> • August 2020: PIL has engaged with direct suppliers (Pacific Oils & Fats Industries Sdn Bhd (PACOIL), Mewah Group (MG) & IOI Group) on the allegation against YP Plantation Sdn Bhd (YPP) for peat development. • August 2020: MG's suppliers shared that YPP is willing to commit NDPE and Board of YPP has issued Stop Work Order on the remaining unplanted area (800 Ha) which named as Ladang Pekan Timur and Ladang Pekan Barat. 	Monitoring

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			(PACOIL), Mewah Group (MG) and IOI Group (IOI)		<ul style="list-style-type: none"> September 2020: YPP shared their Sustainability Policy which incorporates NDPE commitment. During a stakeholders' engagement, Global Environment Centre (GEC) was introduced by MG's supplier to explore possible conservation and rehabilitation initiative. (Please refer to YPP policy) November 2020: MG informed that YPP is exploring options for remediation approach and PIL is advised of a potential project with GEC. August 2021: MG shared that YPP has established partnership with GEC to conserve and rehabilitate 4,800 ha forested and degraded peatland at Pekan Forest Reserve. The first phase of the conservation commenced in February 2021. 	
32	August 2020	Mighty Earth – Rapid Response 30	Indirect supplier – Aspirasi Kristal (M) Sdn Bhd through Bunge Loders Crocklaan (BLC), Mewah Group (MG), Keck Seng (M) Berhad (KS) and IOI Group (IOI)	Alleged deforestation - Aspirasi Kristal (M) Sdn Bhd	<ul style="list-style-type: none"> June - July 2020: IOI declared that Aspirasi Kristal (M) Sdn Bhd (AK) is not in its supply chain, and IOI is committed not to purchase from any supplier who is not in compliance with IOI's Sustainability Policy. Furthermore, IOI and AK are two different entities and IOI holds separate listed companies with their own independent board of directors. IOI has also instructed its third party suppliers to ensure non-compliant FFB does not enter IOI's supply chain. (Please refer to IOI statements in June 2020 & July 2020 respectively) August 2020: PIL has engaged with direct supplier, Mewah Group (MG) on the allegation of deforestation by AK through the supply chain of IJM Plantations Bhd (IJM) and Wilmar - Sandakan Edible Oils. IJM shared with Wilmar and MG that engagement had been done and requested AK to adopt NDPE policy. Meanwhile AK has ceased the land clearing in July 2020. However, AK has constructed the terraces and road development on the cleared area recently. <p>Notwithstanding the above, IJM has suspended the FFB supply from AK. MG will continue monitor and update PIL on the new development of the grievance case.</p> <ul style="list-style-type: none"> November 2020: MG decided to suspend AK and exclude them from their supply chain. 	Closed

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33	August 2020	Mighty Earth – Rapid Response 30 & 31	Indirect supplier – Perbadanan Kemajuan Pertanian Negeri Pahang (PKPP) through Bunge Loders Crocklaan (BLC), Mewah Group (MG), Keck Seng (M) Berhad (KS) and IOI Group (IOI)	<p>Alleged deforestation - PKPP Plantation Sdn Bhd (PKPPSB) under PKPP which owned Sungai Charu Estate and Cherating Estate.</p> <p>Besides that, allegation of deforestation against on Tembeling Estate under PKNP Agro Tech which in turn owned by Perbadanan Kemajuan Negeri Pahang (PKNP)</p> <p>Both PKPP and PKNP are under Pahang</p>	<ul style="list-style-type: none"> August 2020: Perbadanan Kemajuan Pertanian Negeri Pahang (PKPP), a state own development body, owns LKPP Corporation Sdn Bhd (LKPP) and PKPP Plantation Sdn Bhd (PKPPSB). LKPP and PKPP jointly own 31.14% of Far East Holdings Bhd (FEH) while Prosper holds 23.73% in FEH. <p>LKPP owns Dominion Square POM and Lepar POM which supply to PIL's direct suppliers, Bunge Loders Crocklaan (BLC), Mewah Group (MG), Keck Seng (M) Bhd and IOI Group through indirect supplier, Prosper/FEH.</p> <p>PKPPSB has been alleged to have deforested at their own concession between February 2019 and May 2020. This is being address at group level of PKPP. PIL has engaged the above mentioned direct suppliers to resolve the complaint.</p> <ul style="list-style-type: none"> September 2020: A milestone has been set for PKPP to adopt a group level NDPE policy, a stop work order on new plantings and address their liability through a remediation approach. PKPP's response was positive and further engagement will follow. November 2020: PIL's direct supplier, Mewah Group (MG) shared that PKPP has identified two land banks below as a part of remediation approach: <ol style="list-style-type: none"> Lipis, Pahang – 426 Ha Pekan, Pahang – 130 Ha <p>PKPP is in progress of developing group-wide NDPE policy.</p> <ul style="list-style-type: none"> December 2020: MG informed that PKPP has endorsed a group-wide NDPE on 10 November 2020. PIL has requested for a copy of group-wide NDPE policy and Stop Work Order from our suppliers. February 2021: PKPP has established a sustainability platform and shared their sustainability policy which includes NDPE commitment. March 2021: MG confirmed that PKNP's CPO do not enter into their supply chain and MG ceased sourcing from LKPP. 	Closed

NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
				State owned company.	<p>At the same time, BLC has ceased sourcing from LKPP which links to PKPP and PKNP under Pahang State owned company.</p> <ul style="list-style-type: none"> January 2023: PKPP Plantation has committed to a conservation activity at Merapoh forest, Kuala Lipis (202 ha) and peatlands at Kampung Tanjung, Pekan (103 ha). 	
34	August 2020	Mighty Earth – Rapid Response 30	Indirect supplier – Samling Group (SG) through IOI group and Mewah group	Alleged deforestation - Samling LPF 0008 Merudi and Batu Belah under Samling group	<ul style="list-style-type: none"> August 2020: PIL has engaged with direct suppliers, IOI Group (IOI) and Mewah Group (MG). Both suppliers have in turn engaged Samling Group (SG) on the alleged of deforestation activities at LPF0008 Marudi & Batu Belah. SG stated that the cleared area is Licensed Plantation Forest Area (LPFs) which is used for timber production and not oil palm plantations. September 2020: <ul style="list-style-type: none"> - IOI informed that they had stop sourcing from SG since April 2020. (Refer to IOI's Grievance Tracker) - MG suspended SG for the non-compliance to MG's sustainability policy. (Refer to MG's Grievance Tracker) 	Closed
35	August 2020	The Chain Reaction Research	Indirect supplier – Jhonlin Group (JG) through Sime Darby Oils Pulau Laut	Alleged deforestation - PT Pradiksi Gunatama under Jhonlin Group (JG)	<ul style="list-style-type: none"> August 2020: PIL has engaged with Sime Darby Plantation Berhad (SD) on the alleged of deforestation activities at PT Pradiksi Gunatama (PT PG), subsidiary of Jhonlin Group (JG). September 2020: JG has agreed to issue stop work order on their oil palm concession. At the same time, SD shared the guidance on High Conservation Value (HCV) and High Carbon Stock Approach (HCSA) assessment to JG. December 2020: Sime Darby representative has met with JG and JG willing to commit to the following: <ol style="list-style-type: none"> Issue stop work order in their oil palm concession. (PIL has requested for a copy) Commit to conduct HCV – HCSA assessment before land development Agree to conduct social impact assessment In progress of drafting sustainability policy 	Closed

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					<ul style="list-style-type: none"> June 2021: SD has ceased direct purchase from JG w.e.f June 2021. 	
36	January 2021	Mighty Earth – Rapid Response 32	Indirect supplier – SIPEF through BLC, Musim Mas, Sime Darby	Alleged deforestation - PT Agro Muara Rupit under SIPEF group	<ul style="list-style-type: none"> January 2021: PIL does not source directly from PT Agro Muara Rupit (PT AMR) under SIPEF group. However, PT Agro Muara Rupit enter into PIL's supply chain through suppliers (BLC, Musim Mas and Sime Darby). January 2021: SIPEF shared with PIL that PT AMR has concluded RSPO NPP in August 2014 and integrated HCV-HCS assessment was not required during the RSPO NPP process at that time. <p><i>Interpretation of Indicator 7.12.2 RSPO P&C 2018 and Annex 5</i> provide guidance on the transition from HCV to integrated HCV-HCSA Assessment - PT AMR has conducted Land Use Risk Identification (LURI).</p> <p>In April 2020, RSPO approved LURI and the land was classified as “Low Risk”. Therefore, PT AMR proceed with land clearing.</p> <p>Therefore, it is an unfounded allegation against SIPEF for deforestation. SIPEF is committed to No Deforestation as per their Responsible Plantations Policy.</p> <ul style="list-style-type: none"> February 2021: Musim Mas (MM) shared that SIPEF's CPO was not enter PIL's supply chain. 	Closed
37	January 2021	Mighty Earth – Rapid Response 32	Indirect supplier – Bunga Group (BG) through BLC, Musim Mas, Premium Vegetable Oils Sdn Bhd, Mewah Group, IOI and	Alleged deforestation – Value Greenworld Sdn Bhd under Bunga Group	<ul style="list-style-type: none"> January 2021: PIL and our suppliers (BLC, Mewah Group, Premium Vegetable Oils Sdn Bhd, IOI, Musim Mas and Pacific Oils & Fats Industries Sdn Bhd) do not source from Value Greenworld Sdn Bhd (a subsidiary company of Bunga group, BG), the company that's allegedly involved in deforestation. <p>However, PIL's suppliers sourced from Sungei Kahang Sdn Bhd (SK) which owned by BG.</p> <p>BG informed PACOIL that they have been engaged by BLC on this matter in late 2020. BG has taken steps to address the grievance. In summary:</p>	Monitoring



NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
			Pacific Oils & Fats Industries Sdn Bhd (PACOIL)		<ol style="list-style-type: none"> 1. BLC detected land use change and communicated with BG to investigate the suspected “deforestation” area. 2. BG clarified that the said area was classified as “shrubs” at the point of purchase of the land. 3. Upon guidance from BLC, BG took the following steps: <ul style="list-style-type: none"> ○ Issued Stop Work Order on the plantation of Value Greenworld Sdn Bhd ○ Published a Sustainable Palm Oil Policy incorporating NDPE commitments ○ Immediate moratorium on any new land development with conditions <ul style="list-style-type: none"> • December 2020: BG has issued immediate moratorium on new land development in all plantation areas under BG. • January 2021: BG have published its Sustainable Palm Oil Policy. • May 2021: Pending information from PIL’s suppliers on compensation plan by Bunga Group • December 2021: Our suppliers have responded that Value Greenworld had decided to remediate the deforested land and in midst of discussion. The remediation is expected to commence in 2022. • August 2022: The remediation work is halted due to foreign labor shortage and expected to progress as the international borders are now open. 	
38	January 2021	Mighty Earth – Rapid Response 32	Indirect supplier – YPJ through BLC, Sime Darby (SD), Mewah Group (MG), IOI and Pacific Oils & Fats	Alleged deforestation –Ladang SSI Sg. Ara under YPJ Plantation Sdn Bhd (YPJP), which is owned by	<ul style="list-style-type: none"> • January 2021: PIL does not source from YPJ Plantation Sdn Bhd (YPJP) which is owned by Yayasan Pelajaran Johor (YPJ). However, PIL’s suppliers (BLC, Sime Darby, Mewah Group, IOI and PACOIL) source directly from the YPJP. • January 2021: PIL’s suppliers reached out to YPJ and were alerted about deforestation and requested for their response regarding the allegation of deforestation • February 2021: MG verified that this deforestation took place in 1995 and YPJP provided satellite monitoring evidences to support this verification. 	Closed



NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
			Industries Sdn Bhd (PACOIL)	Yayasan Pelajaran Johor (YPJ)	<p>However, MG detected peat clearing within YPJP's concession. YPJP shared Soil Suitability Report by Department of Agriculture Malaysia which shows that the cleared land is not peat. YPJP also shared internal environmental impact assessment dated January 2018, which was carried out to identify impact of new development. EIA was not conducted as area under 500 ha does not require EIA as per Environmental Quality Act 1974.</p> <p>MG verified YPJP has established and shared with PACOIL their sustainability policy incorporating NDPE commitment.</p> <ul style="list-style-type: none"> • Mac 2021: Our supplier, Pacoil, has requested for credible evidence from YPJP relating to the land use change to determine if there is a potential need for compensation for alleged deforestation. • June 2021: Our supplier, SD replied that the land clearing took place at shrub area and they are closely monitoring YPJP commitment towards NDPE. • August 2021: MG stated that there is no further land clearing by YPJP, and they will work together with YPJP to identify any land clearing in Ladang SSI Sg. Ara. • December 2021: Over the months, our suppliers have not detected any land clearing detected under YPJ Plantation. 	
39	July 2021	The Chain Reaction Research	Indirect supplier – Sungai Terah (ST) and Syarikat Cahaya Muda Perak (SCMP) through Sime	Alleged deforestation - Perbadanan Kemajuan Pertanian Selangor (PKPS) which suppliers FFB to Sungai	<ul style="list-style-type: none"> • June 2021: PIL approached direct suppliers SD and IOI on allegation of deforestation by PKPS and response was requested regarding their position on the grievance. <p>PKPS is a government owned corporation that plans to develop 8000 ha land which includes 971 ha of peat swamp forest. The land clearing commenced in February 2021.</p> <ul style="list-style-type: none"> • June 2021: SD informed that their last purchase with SCMP was in early 2020 and there was no more purchase since then. 	Closed

NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
			Darby (SD) and IOI	Terah (ST) and Syarikat Cahaya Muda Perak (SCMP)	<ul style="list-style-type: none"> June 2021: IOI responded that they do not have any commercial relationship with ST since 2020. 	
40	July 2021	Mighty Earth – Rapid Response 33	Indirect supplier- Asam Jawa through PT. Palmindo & PT. Indopalm	Alleged deforestation – PT Uni Primacom (PT UP) under Asam Jawa	<ul style="list-style-type: none"> June 2021: PIL has engaged with direct suppliers, PT. Palmindo and PT. Indopalm on allegation of 52 ha deforestation against PT UP. PT UP is 75% owned by PT Panca Bumisari (PT PB). PT PB holds 36 % shares in PT Sapta Karya Damai (PT SKD) and 32.5% shares in PT Asam Jawa (PT AJ). August 2021: Our supplier has contacted PT UP for a clarification on above allegation. 	Engaged
41	July 2021	Mighty Earth – Rapid Response 33, 34 & 36	Indirect supplier – Astra Group (AG) through AAA Oils & Fats (AAA), Inter-Continental Oil & Fats (ICOF), PT. Palmindo and PT. Indopalm	Alleged deforestation at HCV area - PT Agincourt Resources (PT AR) under AG	<ul style="list-style-type: none"> June 2021: PIL reached out to our suppliers, on allegation of 113 ha deforestation against PT AR. (Report 33: 100 ha, Report 34: 5 ha, Report 36: 8 ha) Astra Group owns 79.68% of Astra Agro Lestari (AAL) and 56.52% of PT AR. AAL is an oil palm business company while PT AR is a mining arm of AG. PIL's suppliers only source from AAL. June 2021: AAA responded that they do not source from PT AR and it is not within their supply chain. July 2021: ICOF will not consider cross commodity as a grievance as it is not within the scope of their Group Sustainability Policy. July 2021: At the same time, PT AR responded to Indopalm and Palmindo that they always provide importance to biodiversity within their concession by detailed flora and fauna study prior to land clearing, protection of natural waterways, prohibiting hunting and capturing fauna and rehabilitation after mining work ceased. 	Monitoring

NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
					<p>Indoplam and Palmindo has further requested for credible evidence from PT AR to determine if the allegation took place within the HCV area and remediation plan if the allegation is proven.</p> <ul style="list-style-type: none"> October 2021: Although PTAR (as a mining company) is not relevant to PIL's supply chain, Indopalm and Palmindo has escalated the matter to PTAR's parent company, United Tractor. PIL has been assured by Indopalm and Palmindo that they will make a strong approach to PT Astra Agro Lestari to bring this matter to the attention of the higher level of the Astra Group. November 2021: Indopalm and Palmindo held a meeting with PT AAL. PT AAL has promised to bring this case to the attention of PT AR. 	
42	July 2021	Mighty Earth – Rapid Response 34	Indirect supplier – Triputra Agro Persada (TAP) through PT. Indopalm and Mewah Oils & Fats (MOF)	Alleged deforestation – PT Brahma Binabakti (PT BB) under TAP	<ul style="list-style-type: none"> July 2021: PIL does not source from PT BB. However, PT BB enters into PIL's supply chain through PT Indopalm and MOF. PT Indopalm reached out to PT BB and alerted about the deforestation and requested for their response regarding the allegation. July 2021: PT BB responded that out of the location permit of 6000 ha, approved HGU was only 214 ha. As a result, they did not renew the location permit since 2015. The 16-ha deforested area lies within the 6000 ha; however, PT BB no longer has any commercial interest in the said land (original location permit of 6000 ha). July 2021: PT Indopalm has requested for credible evidence that PT BB no longer has any commercial interest or link to the said land since 2015. October 2021: PT BB shared email communication with RSPO, requesting to update their concession map at GeoRSPO which will reflect that the deforestation is outside of PT BB's concession. 	Closed

NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
					<ul style="list-style-type: none"> March 2022: PT Indopalm has engaged with RSPO directly to expedite the update of PT BB's concession map at GeorSPO. April 2022: RSPO responded that the land cover prior to clearing is rubber. The land was cleared by local community and is out of PT BB's concession. 	
43	August 2021	Rainforest Action Network – July 2021	Indirect Supplier – PT Muara Jambi Sawit Lestari (MJSL) through PT. Indopalm	Alleged deforestation & social disputes - PT Laot Bangko (LB)	<ul style="list-style-type: none"> August 2021: PT Bima Golden Powerindo owns MJSL and LB. MJSL operates plantation and mill where LB is a plantation. PIL engaged PT Indopalm regarding allegation of deforestation and social disputes by PT LB. August 2021: MJSL provided official letter stating that they do not have any relationship with LB. MJSL shared their NDPE policy (Policy dated January 2021 sighted). September 2021: MJSL responded that LB have excluded the alleged area from HGU and initiated HCV/HCS assessment by HCVRN licensed assessor. December 2021: MJSL shared Laot Bangko's NDPE policy and agreement contract between LB and Fakultas Kehutanan dan Lingkungan - Institut Pertanian Bogor to conduct HCV/HCS assessment. The report will be reviewed by HCVRN Quality Panel. June 2023: PT Indopalm responded that the HCV/HCS assessment is complete and they have engaged with LB to obtain LB's approach on the findings of the report. August 2023: MJSL reiterated that they do not have any relationship with LB. MJSL shared a document that contains initiatives implemented by LB: <ul style="list-style-type: none"> ➤ LB has produced SOPs on Biodiversity Monitoring & Evaluation, HCS Management & Monitoring and HCV Management. ➤ Appointed dedicated staff to manage HCV & HCS area ➤ HVC management & monitoring plan 	Monitoring

NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
					<ul style="list-style-type: none"> ➤ Briefing on HCV & HCS to field workers ➤ Putting up HCV signboard at respective areas ➤ Reporting to <i>Balai Konservasi Sumber Daya Alam</i> (Natural Resources Conservation Centre) ➤ Patrolling of HVC area 	
44	August 2021	Rainforest Action Network – July 2021	Indirect Supplier – PT Sari Dumai Sejati Tangki Timbun (SDSTT) through PT Palmindo	Alleged deforestation – PT Laot Bangko (LB)	<ul style="list-style-type: none"> • PT LB supplies FFB to PT Global Sawit Semesta (GSS). SDSTT purchases CPO from GSS. • August 2021: PIL engaged our direct supplier PT. Palmindo on allegation of deforestation and social disputes by LB. • SDSTT responded that they have suspended GSS. 	Closed
45	October 2021	Chain Reaction Research – October 2021	Indirect supplier – PTPN II through PT. Palmindo and PT. Indopalm,	Alleged deforestation – Perkebunan Nusantara, PN (Parent company of PTPN II)	<ul style="list-style-type: none"> • October 2021: PIL reached out to direct suppliers, PT. Palmindo and PT. Indopalm regarding allegation of 120 ha deforestation at Unit Arso, Papua by PN. • October 2021: PTPN II responded to PT. Palmindo via written letter stating: <ul style="list-style-type: none"> ➤ Unit Arso was built in 1980 for <i>Perkebunan Inti Rakyat (PIR)</i> ➤ <i>Kredit Koperasi Primer Anggota (KKPA)</i> scheme was established from 1996-1997. ➤ PTPN II no longer own plantations and mills in Unit Arso since 1980. ➤ Unit Arso is taken over by local government 	Closed
46	October 2021	Chain Reaction Research – October 2021	Indirect supplier – Sumber Tani Agung (STA) Genting Plantation through PT. Palmindo	Alleged deforestation – PT Tantahan Panduhup (TP) and PT Flora Nusa	<ul style="list-style-type: none"> • October 2021: PIL reached PT. Palmindo regarding allegation of 270 ha deforestation within concessions of TP and FNP. • October 2021: STA replied to PT Palmindo as follows: <ul style="list-style-type: none"> ➤ Both TP and FNP have HCV and HCS assessment dated March 2019 ➤ TP only cleared 3.05 ha in first half of 2021 for plasma 	Closed

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				Perdana (FNP)	➤ Allegation by Chain Reaction Research is not valid as the coordinate of deforested area is not provided.	
47	January 2022	Mighty Earth – Rapid Response 37	Indirect supplier – PT Multipersada Gatramegah through Musim Mas	Alleged deforestation – PT Multipersada Gatramegah under Musim Mas	<ul style="list-style-type: none"> December 2021: PIL reached out to Musim Mas, on allegation of 6.6 ha deforestation which took place in High Carbon Stock (HCS) area against PT Multipersada Gatramegah (MG). Musim Mas has clarified the alleged area was acquired from PT Harisa Agro Lestari on 1st April 2018, which have been assessed for HCV & HCS areas and has undergone the RSPO NPP process. The reports were published on HCVRN, HCSA and RSPO websites. April 2022: Musim Mas (MM) responded that Might Earth used the 2020 Public Summary report which was prepared for the expansion of PT GM. The alleged area in Rapid Response 37 is not within the scope of 2020 assessment. MM even mentioned that the alleged area was externally verified and found that the area is not HCV/HCS. 	Closed
48	March 2022	Mighty Earth – Rapid Response 38	Indirect supplier AA Sawit Sdn Bhd through Bunge Loders Crocklaan (BLC), IOI Group (IOI), Mewah Group (MG), Premium Vegetable Oils Sdn Bhd (PVO), Sime Darby (SD), Musim Mas (MM), FGV Trading Sdn. Bhd (FGV),	Alleged deforestation – AA Sawit Sdn Bhd (AAS) under Mr. Chow Chuin Hai and Sultan of Johor	<ul style="list-style-type: none"> February 2022 – PIL reached out our direct suppliers, on the allegation of deforestation of 25 ha (PTD 1815) at High Carbon Stock (HCS) area against AAS. From 2016 to 2019, AAS also developed 2090 ha of land for oil palm planting. <p>The majority share in AAS is hold by Sultan of Johor (51%) while Mr. Chow Chuin Hai holds 49%.</p> <p>Mr. Chow Chuin Hai owns 54% of SH Trading Co Kluang Sdn Bhd – FFB trader (SHT) and 100% of Jernih Kemboja Sdn Bhd – palm oil mill (JK). Both SHT and JK is registered under AAS business address. AAS and SHT are major FFB suppliers to JK mill.</p> <p>JK mill enters into PIL's supply chain indirectly via our direct suppliers.</p> <p>FGV has clarified that they have stopped sourcing FFB from SHT since 2019. Besides that, FGV has requested explanation from AA Sawit on this allegation.</p> <p>Mewah Group (MG) responded AA Sawit enters into their supply chain via third party sources. MG has imposed trade suspension on JK mill to facilitate investigation.</p>	Closed



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			Delima Oil Products Sdn Bhd (Delima)		<ul style="list-style-type: none"> March 2022: BLC has engaged JK mill for the land clearing conducted by its affiliate company AA Sawit at PTD 1814 and PTD 1815. Upon engagement, BLC has decided to suspend JK mill from their supply chain. FGV responded that they have stopped sourcing from SF Trading Co Kluang Sdn Bhd since 2019. They have appointed a third party entity to conduct verification against the allegation on AA Sawit, which is expected to be completed in April 2022. <p>JK mill responded to PVO that neither JK nor AA Sawit is the owner of PTD 1815. They even mentioned that there was no land clearing since June 2021. PVO will further investigate this allegation.</p> <p>JK mill replied to MM that the 25 land clearing was meant for temporary workers' quarters and storage area. The mill mentioned that there were no land clearing in AAS since June 2021.</p> <ul style="list-style-type: none"> May 2022: Our suppliers-IOI, PVO, FGV and Delima have ceased relationship with JK mill. However, FGV and Delima is ready to provide support to JK mill to become NDPE compliant. July 2022: Our suppliers has responded that JK mill is planning to implement sustainability policy, impose a stop work order at all existing and on-going new developments inclusive PTD 1815, engage independent third party to review all developed areas to identify the liability and will commit to a recovery project. We consider the case is closed as our direct suppliers have ceased purchase from JK mill. 	
49	May 2022	Mighty Earth – Rapid Response 39	Indirect supplier PT Sawit Sukses Sejati through AAA Oils & Fats (AAA),	Alleged deforestation – PT Sawit Sukses Sejati (PT SSS)	<ul style="list-style-type: none"> May 2022: PT SSS is alleged for 340ha deforestation at HCS area. PT SSS is associated with PT Teguhkarsa Wanalestari (PT TKWL), PT Asia Sawit Lestari (PT ASL) and PT Prima Mas Lestari (PT PML). Meanwhile, Sumber Tani Agung (STA) sources from PT SSS. <p>Our suppliers are sourcing indirectly from PT SSS via PT TKWL, PT ASL and STA. PIL approached our supplies AAA, ICOF, MM, MG and Indopalm pertaining to this allegation.</p>	Closed

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			Inter-Continental Oil & Fats (ICOF), Musim Mastika (MM) Mewah Group (MG) and PT. Indopalm		<p>Our supplier has reached out PT TKWL and PT ASL. Both entities have denied relationship and have not sourced from PT SSS.</p> <ul style="list-style-type: none"> • June 2022: STA responded to Indopalm that they have ceased sourcing FFB from PT SSS and are further engaging with PT SSS to seek for clarification regarding the allegation. • July 2022: Our supplier is investigating the ownership of PT SSS and its potential relationship with PT TKWL. • We consider the case is closed as our direct suppliers do not source from PT SSS. 	
50	January 2023	Rainforest Action Network (RAN)	<p>Indirect supplier Global Sawit Semesta (GSS) through AAA Oils & Fats (AAA)</p> <p>Direct supplier PT Runding Putra Persada (PT RPP) through PT. Palmindo</p>	Alleged deforestation - Mr. Mahmudin's illegal plantation located in Rawa Singkil Wildlife reserve.	<ul style="list-style-type: none"> • January 2023: The report from RAN states that GSS sources indirectly from illegal plantation that belongs to Mr. Mahmudin, through a broker CV Natama Prima (CVNP). <p>Mr. Mahmudin also supplies to PT Runding Putra Persada via another broker, CV Buana Indah (CVBI).</p> <p>Indirect Supply: Apical has confirmed that CVNP is a supplier to GSS. GSS in turn is a supplier of Apical.</p> <p>CVNP sources from 3 estates that belongs to Mr. Mahmudin, in which all 3 estates are located at non-forested area (Area Penggunaan Lain, APL). This is verified by overlaying GPS coordinates with Spatial National Map.</p> <p>GSS took decision to cease sourcing from all Mr. Mahmudin's estates.</p> <p>Direct Supply: PT. Palmindo has engaged PT. RPP on their stand regarding this allegation.</p> <ul style="list-style-type: none"> • February 2023: PT. RPP informed PT. Palmindo that they have engaged with PT. Koltiva who will assist them to trace the FFB sources from CVBI. 	Monitoring



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51	January 2023	Environmental Investigation Agency (EIA)	Direct supplier PT Rimba Mujur Mahkota (PT RMM) through PT. Indopalm & PT. Palmindo	Alleged deforestation - PT Sawit Sukses Sejati (PT PSS)	<ul style="list-style-type: none"> January 2023: EIA reported that PT PSS is connected with deforestation in 2021 and 2022. PT PSS supplies to Sikara-kara mill which belongs to PT RMM (Pasifik Agro Sentosa Group). Sikara-kara mill is a direct supplier to PT. Indopalm and PT. Palmindo PT. Indoplam & PT. Palmindo approached PT RMM to seek for clarification. PT RMM have confirmed that their mill, Sikar-kara has ceased sourcing from PT PSS effective January 2022. 	Closed
52	June 2023	Internal satellite monitoring - Maphubs	Indirect supplier Bukit Leelau mill through IOI Group	Alleged deforestation - 28.50 km from Bukit Leelau (BL) mill	<ul style="list-style-type: none"> June 2023: Our consultant alerted us on a deforestation which is 28.50 km away from Bukit Leelau mill, which belongs to IOI. BL enter into PIL's supply chain via our direct supplier IOI. PIL reached out IOI on the above alert allegation to ensure FFB from deforested area/estate does not enter into PIL's supply chain via BL mill. IOI responded by providing satellite imagery that overlays concessions that supplies to BL mill. It is found that none of the concession maps overlaps with the deforested area, proving that BL does not source from the deforested area. 	Closed



Summary of Grievance Cases

Year	Grievance Cases Lodged	Grievance Cases Closed	Cases Engaged & under Monitoring	*Total Non-Compliant Deforestation (Ha)
2018	0	0	0	0
2019	23	22	1	921
2020	10	5	5	1537
2021	7	4	3	0
2022	3	3	0	0
2023	3	2	1	0

*Total Non-Compliant Deforestation (Ha) is calculated based on cases that are verified and entered into PIL Group's supply chain only, following our cut-off date subjected to the period each Sustainable Palm Oil Sourcing Policy established for various entities under PIL Group as follows:

- PIL-December 2018
- Pacoil-August 2020
- Indopalm, Palmindo, Pamin-November 2020
- Oleochem- August 2021



Pacific Inter-Link (PIL) Group – Suspended Suppliers

Compliance to [PIL Group Sustainable Palm Oil Sourcing Policy](#) is crucial to the successful implementation of a transparent, traceable and verified supply chain for PIL Group. Grievances against PIL’s direct and indirect suppliers, brought to our attention about allegations of non-compliance to PIL Group Sustainable Palm Oil Sourcing Policy, are deliberated by PIL’s senior management. Suppliers who do not respond, comply, or compliance cannot be confirmed, with our policy from December 2018, will be suspended from PIL Group’s supply chain as the last resolution.

As for long term monitoring and continuous improvement, PIL Group will engage and assist responsive suppliers, to provide support in terms of advisory and guidance to bring back their operations to compliance within 12 months’ time period. Suppliers who do not respond to any non-compliance upon engagement within 3 months will be subjected to suspension. Suspended/ non-compliant suppliers are required to develop an action plan which includes compensation, conservation or restoration with time bound commitments for all non-compliance (verified cases of deforestation, new development on peatland and/or human rights abuse) after December 2018, to re-enter PIL Group’s supply chain.

The objectives of this list is to inform PIL Groups direct suppliers that products from suspended entities must not enter into PIL Group’s supply chain, and to increase transparency and improve communication to PIL Group’s suppliers and stakeholders. Suppliers that are suspended from PIL Group’s supply chain indicates that they fail to comply with our Sustainable Palm Oil Sourcing Policy, poor sustainability credential and/or failure to respond to our engagement or grievance raised.

No	Company/ Group	Date
1	Duta Palma / Darmex Agro	June 2021

Disclaimer –

The information disclosed is correct and credible, to the best of our knowledge at the time of publication.

PIL is not making any accusations of legal offences.

PIL does not guarantee its accuracy and welcome any corrections from suppliers and stakeholders. Provision of reliable information that enables PIL to review ours and make the necessary corrections is greatly appreciated.