



PACIFIC INTER-LINK SDN BHD GRIEVANCE TRACKER

(UPDATED 31 DECEMBER 2020)

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. Palmindo, PT. Indopalm, AAA Oils & Fats (AAA) and Inter-Continental Oils (ICOF)	Alleged deforestation – PT Kahayan Agro Plantation (PT KAP)	<ul style="list-style-type: none"> June 2019: PIL reached out to direct suppliers, PT. Palmindo, 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. 	Engaged



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2	12 June 2019	Mighty Earth – Rapid Response 15	Indirect supplier – Genting Plantation through Intercontinental Specialty Fats	Alleged deforestation – PT Citra Sawit Cemerlang	<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	<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, 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 1,14,15, 18, 19, 20, 23, 24 & 25	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	<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 	Closed

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					<p>(Sabah & Sarawak) Sdn Bhd (THLSS) in turn wholly owned by Lembaga Tabung Haji (LTH).</p> <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> <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	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. 	Closed



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			Oils & Fats (AAA)		<ul style="list-style-type: none"> August 2019: AAA provided clarification received from KAL that the alleged land clearing is located outside of PT ASL'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>	
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)	<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

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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
11	18 July 2019	Mighty Earth – Rapid Response 17	Indirect supplier –PT. Asianagro Lestari (PTAL), (RGE Group) through AAA Oils & Fats ((AAA)	Alleged peat forest development and clearance prep / stacking line – PT. Usaha Sawit Unggul (PT USU)	<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	Alleged deforestation of PT Kurun Sumber Rezeki (PTKS) a joint venture with 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. 	Closed

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			Pte. Ltd. (ICOF)	Kumpulan Kris Jati Sdn. Bhd (KJSB), owned through joint-venture relationship with CB Industrial Product Holdings (CBIP)	<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 KKJSB and SGSB 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 . 	
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)	<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 Megatara 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 vise-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

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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 [“KLHH”] (attached letter) as Community Forest Plantation [Hutan Tanaman Rakyat (“HTR”)] area. <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>	Closed
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)	<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. 	Closed



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					<ul style="list-style-type: none"> 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 . 	



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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)	<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	<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)	<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. 	Closed

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					<p>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.</p> <p>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.</p> <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)	<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. 	Engaged

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					<ul style="list-style-type: none"> 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>	
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)	<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> <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

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22	8 January 2020	Mighty Earth – Rapid Response 23	Direct supplier – Inter-Continental Oils (ICOF)	Alleged deforestation – PT Andalan Sukses Makmur (PT ASM)	<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	<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 – present: 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. (Please refer to RSPO Website) 	Monitoring

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				members between May 2009 and August 2014.		
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 Palmindo Industri	Violation of the RSPO Code of Conduct because of PIL's alleged involvement in the control/ownership and operational development of four palm oil plantation companies in Papua. The allegation states PT Megakarya Jaya Raya, controlled by the HSA Group, has cleared an estimated 4,000 ha of forest for oil palm	<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. September 2020: Complainants offered an undertaking of confidentiality which was communicated to PIL. 	Engaged



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				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 KCP), Fofi/Jair Districts, Boven Digoel, Papua, Indonesia - PT Energi Samudera Kencana (PT ESK),	<ul style="list-style-type: none"> November 2020: After due consideration, PIL found the undertaking of confidentiality not adequate and communicated the same to the Complaints Panel. Refer to RSPO Complaints Portal .	

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				Mandobo/Fofi/Jair Districts, Boven Digoel, Papua, Indonesia - PT Graha Kencana Mulia (PT GKM), Fofi/Jair Districts, Boven Digoel, Papua, Indonesia		
26	March 2020	Chain Reaction Ref - April 9 2020	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. <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. 	Monitoring

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					<ul style="list-style-type: none"> 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. PIL will continue monitor the progress of the conservation project and engaged with PG if necessary. 	
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 - 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: <ol style="list-style-type: none"> LTH issued moratorium to cease all deforestation activities by DSSB with effect from October 2020. THP revised Sustainability Policy incorporated with NDPE Commitment in November 2020. Full termination of management services is expected by end of Year 2020. 	
28	October 2019	Mighty Earth – Rapid Response 20	Direct supplier - AAA Oils and Fats Pte Ltd	Alleged deforestation – PT Makmur Bersama Asia (PT MBA), 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	Alleged deforestation - PT Citra Niaga Perkasa (PT CNP), 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 	Closed

NO.	GRIEVANCE LOGGED DATE	STAKEHOLDER / GRIEVANCE RAISER	LINKED SUPPLIER / PIL'S SUPPLY BASE	GRIEVANCE ALLEGATION	ACTION TAKEN	STATUS
			Sdn Bhd (IOI), Inter-Continental Oils & Fats Pte Ltd (ICOF) and Mewah Oils Pte Ltd (MG)		2019 and FGV had reiterate stop work order since May 2017. Kindly refer the clarification from FGV.	
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)	<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 present some possible conservation and rehabilitation project to ASPA and positive outcome has been achieved. Next, GEC will organized a site visit with ASPA. (Please refer to BLC's grievance tracker for ASPA policy)</p>	Engaged

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31	August 2020	Mighty Earth – Rapid Response 30	Indirect Supplier YP Plantation Sdn Bhd (YPP) through Pacific Oils & Fats (PACOIL) Industries Sdn Bhd (PACOIL), Mewah Group (MG) and IOI Group (IOI)	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. • 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 at Bukit Belata (North Selangor). 	Engaged
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 Kirstal (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>	Closed

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					<ul style="list-style-type: none"> November 2020: MG decided to suspend AK and exclude them from their supply chain. 	
33	August 2020	Mighty Earth – Rapid Response 30	Indirect supplier – Perbadanan Kemajuan Pertanian Negeri Pahang through Bunge Loders Crocklaan (BLC), Mewah Group (MG), Keck Seng (M) Berhad (KS) and IOI Group (IOI)	Alleged deforestation - PKPP Plantation Sdn Bhd (PKPPSB)	<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. 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. 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. September 2020: A milestone has set for PKPP to adopt a group level NDPE policy, 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 	Engaged

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					<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. 	
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) 	Monitoring
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	<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: 	Engaged



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					<ul style="list-style-type: none"> a. Issue stop work order in their oil palm concession. (PIL has requested for a copy) b. Commit to conduct HCV – HCSA assessment before land development c. Agree to conduct social impact assessment d. In progress of drafting sustainability policy 	