

# Sustainability performance assessment for palm oil producers



Institute for Sustainable Futures  
Prepared for Stewart Investors



## ABOUT THE AUTHORS

The Institute for Sustainable Futures (ISF) is an interdisciplinary research and consulting organisation at the University of Technology Sydney (UTS). ISF has been setting global benchmarks since 1997 in helping governments, organisations, businesses and communities achieve change towards sustainable futures. We utilise a unique combination of skills and perspectives to offer long term sustainable solutions that protect and enhance the environment, human wellbeing and social equity.

ISF acknowledges and respects the Aboriginal and Torres Strait Islander custodians of Australia and the Gadigal peoples upon which the UTS City Campus now stands. We continue to value the generations of knowledge Aboriginal and Torres Strait Islander Peoples embed within our University and we pay our respect to their Elders past, present and emerging.

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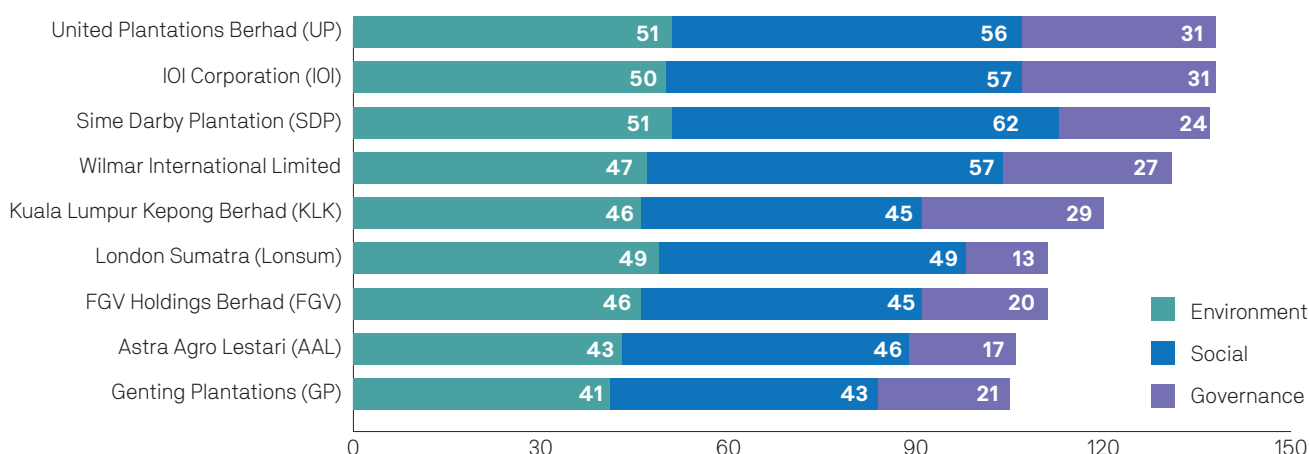
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# Executive Summary

Palm oil is one of the most versatile vegetable oils used in the world today, with applications ranging from food and pharmaceuticals to cosmetics, cleaning products and biofuels. However, palm oil production is a major driver of deforestation and habitat loss in some of the most biodiverse areas in Asia and Africa. There are also concerns regarding the exploitation of workers and the land rights of local communities.

Investors can play a key role in influencing the behaviours of the companies they invest in and their supply chains. For this reason, Stewart Investors commissioned the Institute for Sustainable Futures (ISF) to assess the sustainability performance of nine key palm oil producers and their change over the past ten years:

**Figure 1: Relative ranking of companies for environmental, social & governance sustainability**



United Plantations, IOI Corporation and Sime Darby Plantations (SDP) are the leading companies in terms of overall as well as sectoral performance. Wilmar and Kuala Lumpur Kepong (KLK) follow the industry leaders. London Sumatra (Lonsum), FGV Holdings Berhad, Astra Agri Lestari (AAL), and Genting Plantations (GENP) are the lowest scoring companies. Although these companies have moved beyond compliance-led action, they still need far greater action in all categories to reach the industry's sustainability leaders.

## COMMON AREAS OF STRENGTH INCLUDE:

- Well defined policies on environmental, social and governance aspects of sustainability;
- Low incidence of documented grievances and good management processes in place to resolve grievances;
- Well documented plans and procedures for managing, tracking and reporting on sustainability commitments, especially operations management;
- Active industry engagement and leadership through different alliances and working groups; and
- High levels of support and traceability in their supply chains.

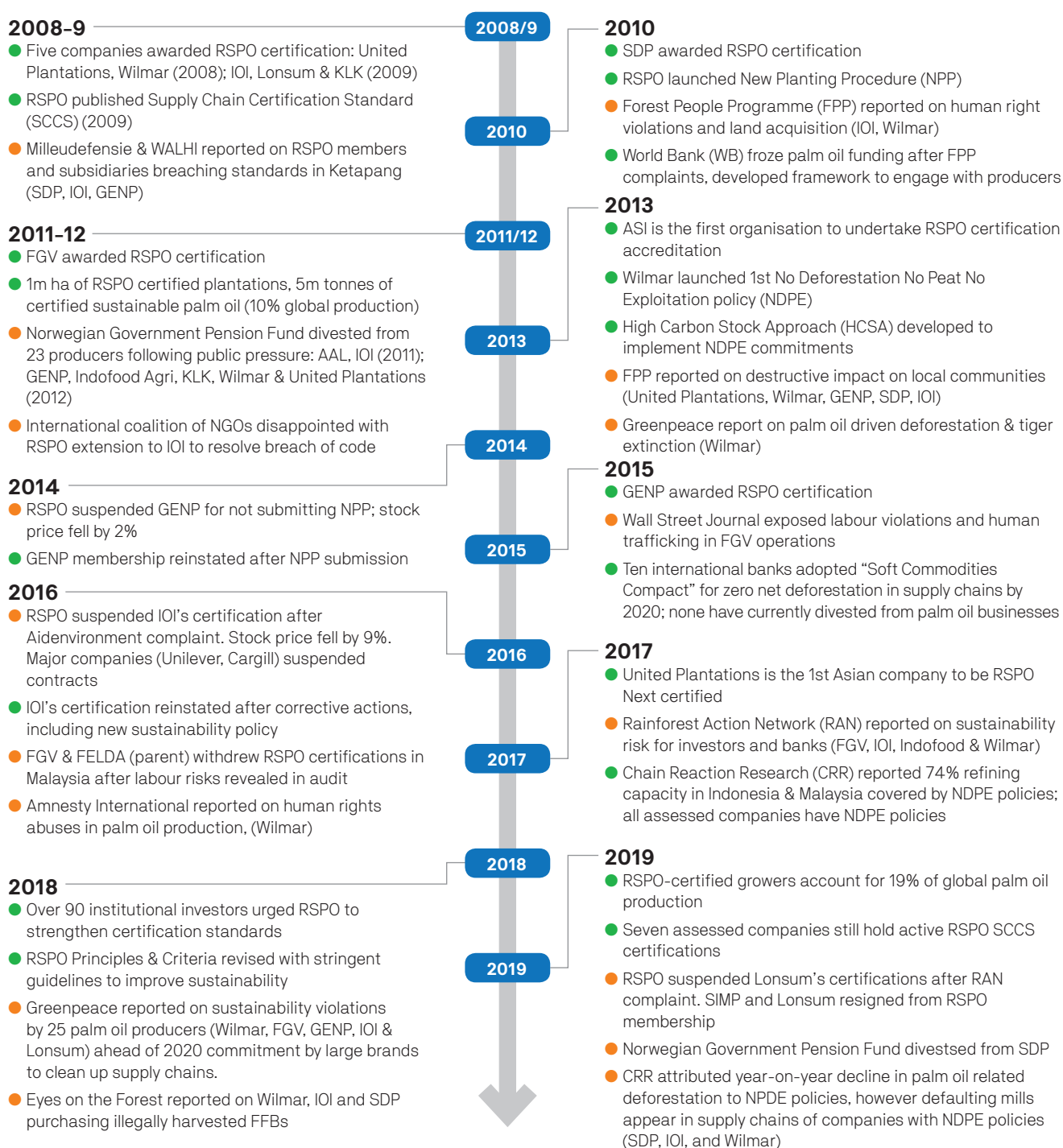
## COMMON AREAS OF WEAKNESS INCLUDE:

- Lack of mechanisms to track progress on public commitments and sustainability policies;
- Absence of reporting on the efficiency of operations management i.e. waste, water, chemical, pest, GHG management;
- Fair/decent work policies not linked to standard procedures and protocols to uphold objectives;
- Some long-term unresolved grievances or lawsuits against the companies and their subsidiaries; and
- Limited support provided to smallholders and independent suppliers.

# Executive Summary continued

Reports from activists and independent researchers have recognised sustainability progress over time, particularly with regard to deforestation in companies' owned operations. Figure 2 below outlines the key sustainability milestones for the assessed companies.

**Figure 2: Key events for the assessed companies and the sector in the last ten years**



<sup>1</sup> (Wilmar (IP, MB,SG), IOI (MB, SG), FGV (MB, SG), UP (IP,MB,SG), KLK (IP, MB,SG), SDP (MB,SG), GP (IP, MB,SG))

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# Acronyms & abbreviations

Acronyms	Full Form
<b>AAL</b>	Astra Agro Lestari
<b>ASEAN</b>	Association of Southeast Asian Nations
<b>ASI</b>	Accreditation Services International
<b>BORA</b>	Borneo Rhino Alliance
<b>BWPT</b>	PT BW Plantation Tbk
<b>CPKO</b>	Crude Palm Kernel Oil
<b>CPO</b>	Crude Palm Oil
<b>CRR</b>	Chain Reaction Research
<b>CSR</b>	Corporate Social Responsibility
<b>FELDA</b>	Federal Land Development Authority, Malaysia
<b>FFB</b>	Fresh Fruit Bunches
<b>FGV</b>	FGV Holdings Berhad
<b>FoB</b>	Friends of Borneo
<b>FoE</b>	Friends of the Earth
<b>FPIC</b>	Free, Prior and Informed Consent
<b>FPP</b>	Forest Peoples Programme
<b>GHG</b>	Greenhouse gases
<b>GENP</b>	Genting Plantations
<b>GRI</b>	Global Reporting Initiative
<b>HCS</b>	High Carbon Stock
<b>HCV</b>	High Carbon Value
<b>ILRF</b>	International Labor Rights Forum
<b>IMU</b>	Investigation & Monitoring Unit
<b>IPM</b>	Integrated Pest Management
<b>IPOP</b>	Indonesia Palm Oil Pledge
<b>ISCC</b>	International Sustainability and Carbon Certification Scheme
<b>ISPO</b>	Indonesian Sustainable Palm Oil
<b>KL</b>	Kuala Lumpur

Acronyms	Full Form
<b>KLK</b>	Kuala Lumpur Kepong
<b>Lonsum</b>	London Sumatra
<b>MSPO</b>	Malaysian Sustainable Palm Oil Standard
<b>NBPOL</b>	New Britain Palm Oil Limited
<b>NDPE</b>	No Deforestation, No Peat, No Exploitation
<b>NGO</b>	Non-Government Organisation
<b>NPP</b>	New Planting Procedure
<b>OCEAN</b>	Oro Community Environmental Action Network
<b>OHS</b>	Occupational Health and Safety
<b>OPPUK</b>	Organisasi Penguatan dan Pengembangan Usaha-usaha Kerakyatan
<b>PNG</b>	Papua New Guinea
<b>PONGO Alliance</b>	Palm Oil & NGO Alliance
<b>PROPER</b>	Programme for Environmental Performance Rating
<b>RAN</b>	Rainforest Action Network
<b>RRDC</b>	Rainforest Resource & Development Centre
<b>RSPO</b>	Roundtable on Sustainable Palm Oil
<b>SSCS</b>	Supply Chain Certification Systems
<b>SDGs</b>	Sustainable Development Goals
<b>SDI</b>	Sustainable Development Institute
<b>SDP</b>	Sime Darby Plantations
<b>SEIA</b>	Social and Environmental Impact Assessment
<b>SOMO</b>	Centre for Research on Multinational Corporations
<b>SPOTT</b>	Sustainability Policy Transparency Toolkit
<b>UNGC FABPs</b>	United Nations Global Compact Food & Agriculture Business Principles
<b>UP</b>	United Plantations
<b>WALHI</b>	Friends of the Earth Indonesia/Wahana Lingkungan Hidup Indonesia
<b>WSJ</b>	Wall Street Journal
<b>WWF</b>	World Wide Fund for Nature
<b>ZSL</b>	Zoological Society of London

# Introduction

## Context

Palm oil, derived from the fruit of oil palms, is one of the most widely consumed vegetable oils in the world, as it is inexpensive and has a wide range of applications<sup>i</sup>. Palm oil is an ingredient of over half of all packaged products including pre-packaged food, cosmetics & personal care items, cleaning products, pharmaceuticals and biofuels<sup>ii</sup>. Cultivation and processing forms a crucial part of the economy and workforce around plantations, particularly in Indonesia and Malaysia who produce 86% of the world's supply<sup>iii</sup>.

However, unsustainable large-scale palm oil production has serious adverse impacts, such as: deforestation leading to habitat loss and fragmentation for endangered species; infringements of the land rights of local populations; air, soil and water pollution; and contribution to climate change.

## Objectives

Stewart Investors commissioned ISF to assess the sustainability performance of nine key palm oil producers and their improvement/change over the past ten years.

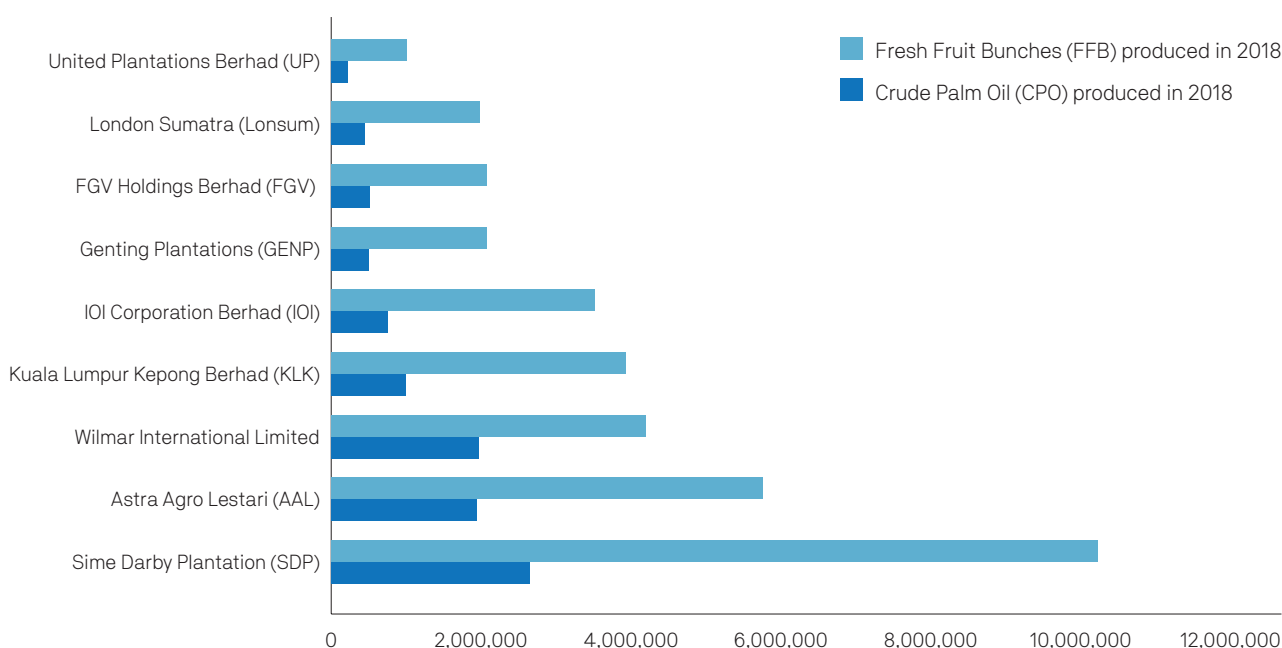
Thus, this research:

- Developed a comprehensive framework to assess sustainability performance of palm oil production;
- Assessed the sustainability performance of selected palm oil companies;
- Evaluated and ranked the selected companies based on their current sustainability performance; and
- Assessed the sustainability progress made by each company over the past 10 years (2009-2019).

## Companies Assessed

Stewart Investors selected the following nine palm oil producers for assessment, which does not include all major global producers. Figure 3 below presents a comparison of the production capacity of the selected producers.

**Figure 3: Production capacity of selected producers in 2018**





**UNITED PLANTATIONS (UP)**

Plantations: 50,000 ha  
 Location: **Malaysia** (80%) and **Indonesia** (20%)  
 Employees: 6,508

**IOI CORPORATION BERHAD (IOI)**

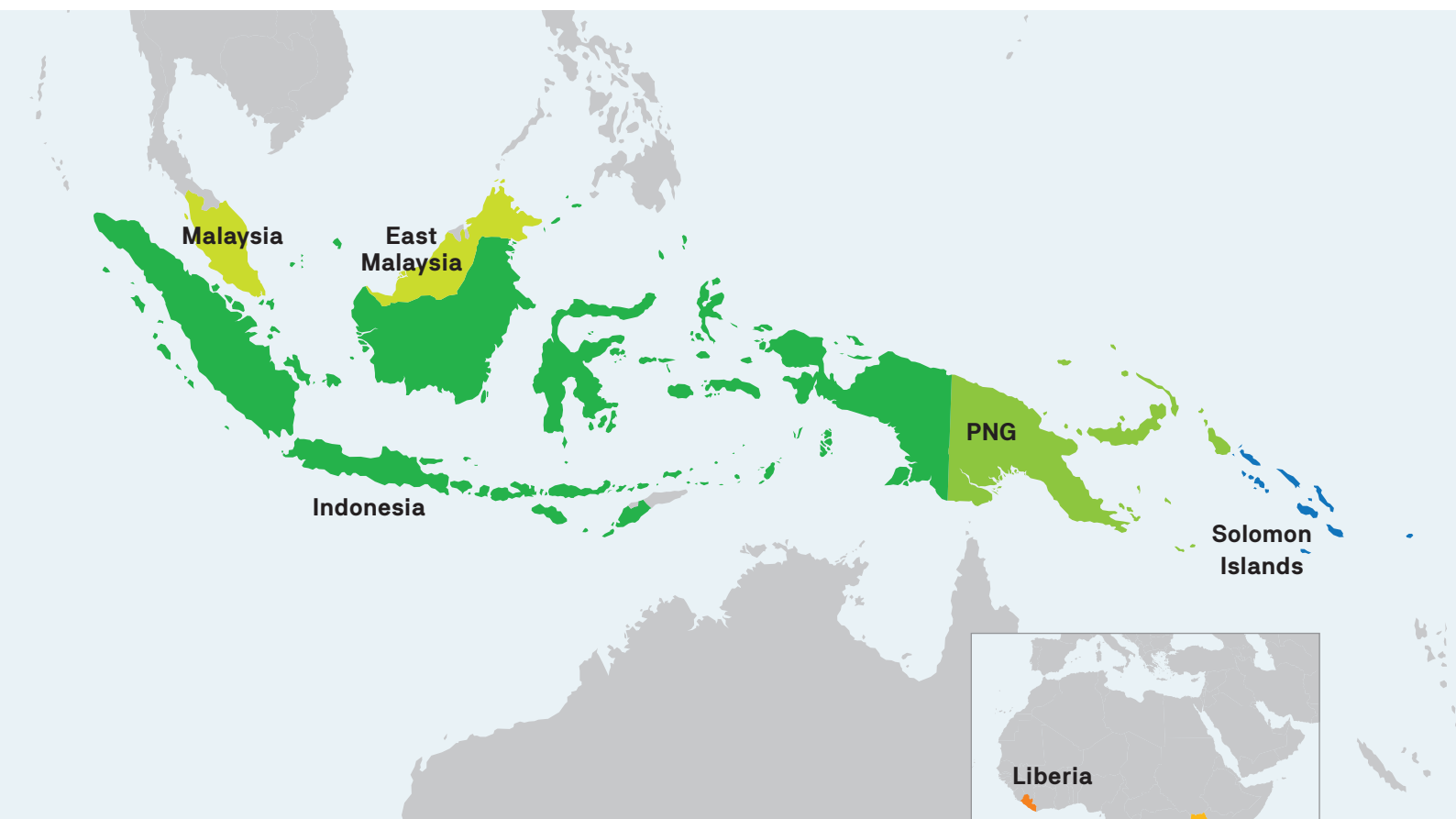
Plantations: 178,047 ha  
 Location: **Malaysia** (95%) and **Indonesia** (5%)  
 Employees: 28,000

**SIME DARBY PLANTATION (SDP)**

Plantations: 630,000 ha  
 Location: **Malaysia** (35%), **Indonesia** (28%), **PNG and Solomon Islands** (15%) and **Liberia** (22%)  
 Employees: 97,000

**KUALA LUMPUR KEPONG BERHAD (KLK)**

Plantations: 210,000 ha  
 Location: **Indonesia** (51%), **Malaysia** (41%) and **Liberia** (8%)  
 Employees: 40,000



**WILMAR INTERNATIONAL LIMITED**

Plantations: 230,409 ha  
 Location: **Indonesia** (67%), **East Malaysia** (25%) and **Africa** (8%).  
 Employees: 90,000

**FGV HOLDINGS BERHAD**

Plantations: 439,725 ha  
 Location: **Malaysia** (95%) and **Indonesia** (5%)  
 Employees: 19,101



**ASTRA AGRO LESTARI (AAL)**

Plantations: 297,011 ha  
 Location: **Indonesia**  
 Employees: 47,218

**LONDON SUMATRA (LONSUM)**

Plantations: 96,000 ha  
 Location: **Indonesia**  
 Employees: 15,303

**GENTING PLANTATIONS (GENP)**

Plantations: 247,400 ha  
 Location: **Indonesia** (74%) and **Malaysia** (26%)  
 Employees: 8,464

# Research approach

## Approach

The research methodology combined a desktop review and qualitative interviews to evaluate the sustainability performance of the companies. The assessment framework was developed across the three themes of environmental, social and governance responsibilities. The detailed research approach is explained in Appendix 1.

### CURRENT STATE ASSESSMENT AND RANKING

ISF developed an assessment framework with 3-4 criteria within each of the themes of environmental, social and governance sustainability for current performance as shown in Figure 4. A total of 37 indicators sit under the criteria that were derived from RSPO, POIG, SPOTT and other certification bodies in the palm oil sector. The complete assessment framework is provided in Appendix 3.

### 10-YEAR PROGRESS REVIEW

A hybrid quantitative and qualitative approach was used to compare the performance of companies over time, since it was not possible to objectively rank each company for each year since 2009. Instead the ten-year review considered: a constructed timeline for each company using media reports and other published information; interview data, particularly from industry experts; and historic SPOTT assessments.

### ABOUT THE RESULTS

This research and report provide a baseline for Stewart Investors on the sustainability performance of palm oil producers included in the assessment. Stewart Investors can use these findings to engage with these companies to improve their sustainability performance.

- The summary results illustrate how individual companies are performing against peers and their progress over time (pages 10 to 14).
- The detailed company assessments show specific areas of weakness and opportunities to improve with individual companies (pages 15 to 33).

**Figure 4: Assessment framework: criteria**



## SUSTAINABILITY PERFORMANCE SPECTRUM

The scores were calculated using a sustainability performance spectrum that assessed the company's level of action against each indicator from 0 (no action) to 5 (systemic action) as seen in Figure 5. The scores of each company against each indicator are represented using a coloured "heat map" approach (e.g. red for no action, to green for systemic action) to highlight specific areas of strength and weakness (Figure 7).

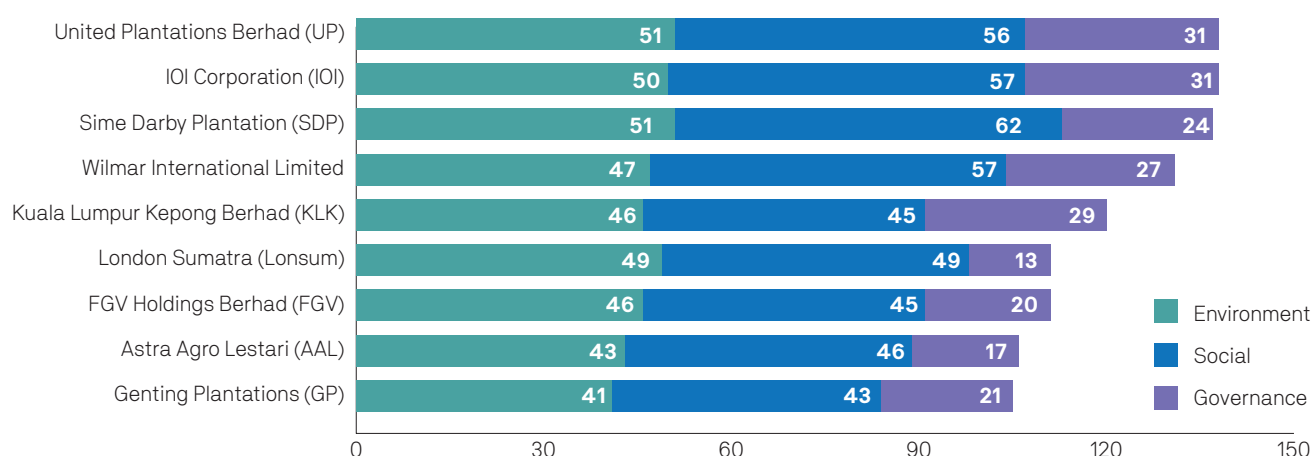
This led to a composite score out of 185, which was aggregated for their environmental, social & governance performance. The total scores were used to deliver a relative ranking of the companies' current sustainability performance (Figure 6).

**Figure 5: Sustainability performance spectrum**



# Results

**Figure 6: Overall ranking of the assessed companies in the three categories of environment, social and governance sustainability**



## Company rankings

The results vary significantly between the highest and lowest performing companies, showing that there is still a wide range of action being taken on sustainability by palm oil producers.

The key points to note are:

- The top three performing companies are United Plantations, IOI and SDP. However, even these best performing companies have not attained best practice sustainability.
- SDP and United Plantations lead in environmental performance, SDP leads in social performance and United Plantations and SPD lead in governance performance.
- Wilmar and KLK closely follow the industry leaders.
- Lonsum, FGV Holdings, Astra Agri Lestari (AAL), and Genting Plantations (GENP) are the lowest scoring companies that, although they have moved beyond compliance-led action, still need far greater action in all categories to reach the industry's sustainability leaders.
- The results are broadly consistent with the most recent SPOTT assessment rankings from November 2018.

### COMMON AREAS OF STRENGTH INCLUDE:

- Well defined policies on environmental, social and governance aspects of sustainability;
- Low incidence of documented grievances and good management processes in place to resolve grievances;
- Well documented plans and procedures for managing, tracking and reporting on sustainability commitments, especially operations management;
- Active industry engagement and leadership through different alliances and working groups; and
- High levels of support and traceability in their supply chains.

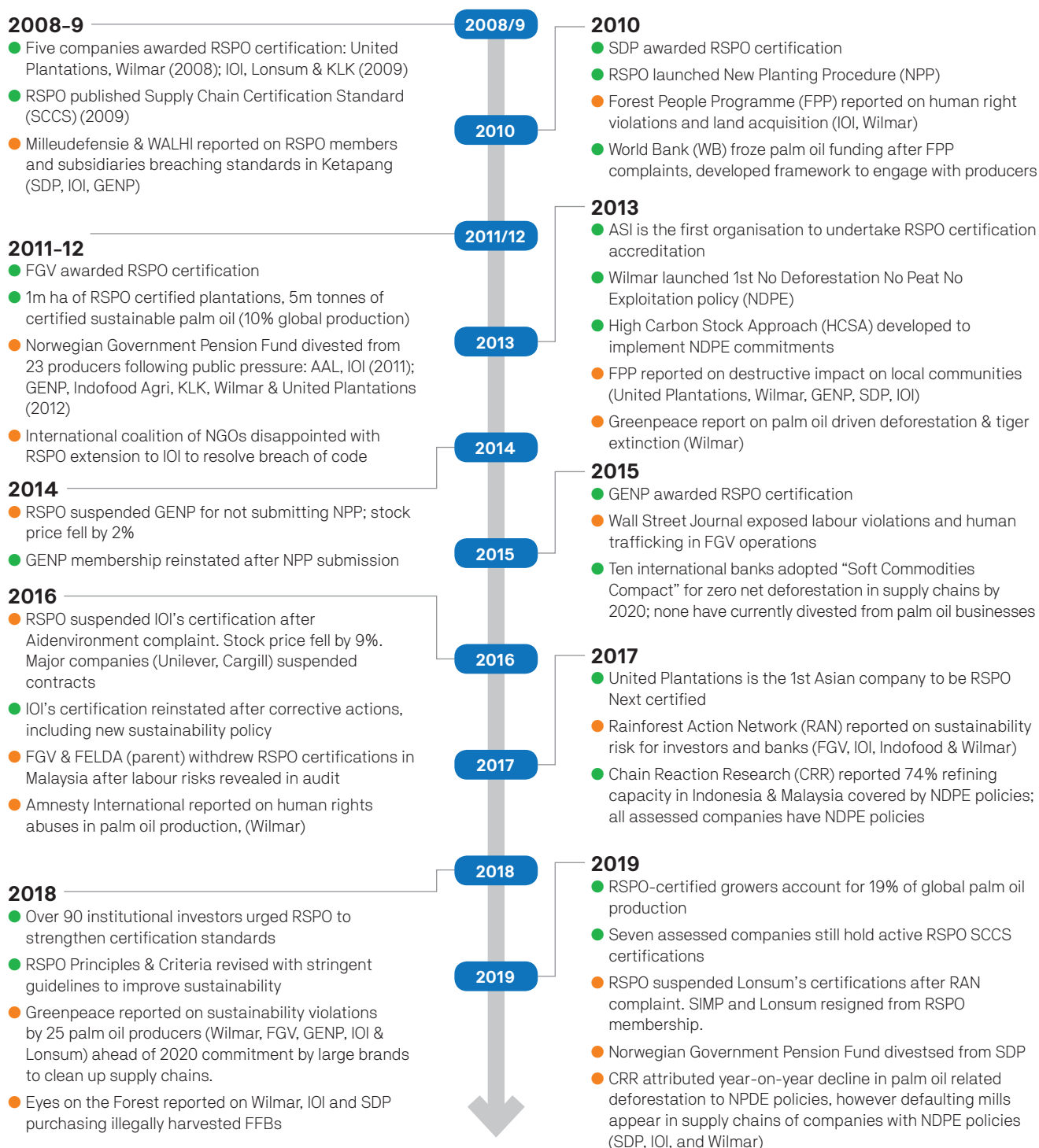
### COMMON AREAS OF WEAKNESS INCLUDE:

- Lack of monitoring and tracking mechanisms to understand progress on public commitments and sustainability policies;
- Absence of reporting on the efficiency of operations management i.e. waste, water, chemical, pest, GHG management;
- Fair/decent work policies not linked to standard procedures and protocols to uphold objectives;
- Some long-term unresolved grievances or lawsuits against the companies and their subsidiaries; and
- Limited support provided to smallholders and independent suppliers.

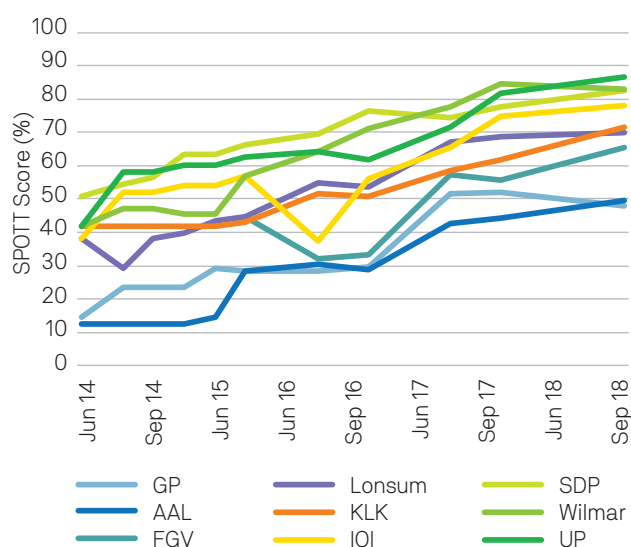


# Results continued

**Figure 8: Key events for the assessed companies and the sector in the last ten years**



<sup>1</sup> (Wilmar (IP, MB,SG), IOI (MB, SG), FGV (MB, SG), UP (IP,MB,SG), KLK (IP, MB,SG), SDP (MB,SG), GP (IP, MB,SG))

**Figure 9: SPOTT assessments over time**

**Disclaimer:** This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.

## 10 YEAR REVIEW: SPOTT SCORES

For the past five years, historic SPOTT assessments offer a more detailed and transparent comparison of the assessed companies (Figure 9).

### Key points to note include:

- As of November 2018, United Plantations, Wilmar and SDP scored highest within the group of assessed companies. Across all 70 palm oil producers SPOTT assesses, United Plantations ranks at 5<sup>th</sup> worldwide and 2<sup>nd</sup> in Asia.
- The two lowest scoring companies from the assessed group, AAL and GENP, rank at 36 and 37 respectively in the overall SPOTT ranking. AAL scores poorly primarily because they are not an RSPO member and therefore cannot be certified under the RSPO scheme.
- When the SPOTT assessments were initiated in 2014, SDP was ranked highest among this cohort, even with a medium transparency score range, followed by United Plantations, Wilmar and KLK.

- Over the last 4 years of assessments, the overall trend of companies has been to improve their transparency scores. Wilmar however reported a 1.5% decline in its transparency score since its last assessment in 2017. IOI also reported a dip in their SPOTT scores in 2016. One of the reasons for IOI could be the temporary suspension of their RSPO certificates, as their scores improved towards the end of the year.
- Lonsum was only assessed as a separate company until 2016, and since then the assessment is for the parent company Indofood Agri Resources. Lonsum's last SPOTT assessment dates to November 2018 and does not account for the suspension of its RSPO certification in 2019.

Most companies show progress in the SPOTT assessments over time as sustainability policies and practices are established. However, a high level of transparency does not necessarily mean that a company is sustainable in terms of implementation. While SPOTT includes some indicators focused on companies self-reporting progress against targets (e.g. water intensity of operations), it is primarily focused on the existence and availability of public policies and commitments.

### About SPOTT

SPOTT – Sustainability Policy Transparency Toolkit – is a free, online platform supporting sustainable commodity production and trade, developed by ZSL (Zoological Society of London). SPOTT assesses 70 palm oil producers and traders on the public disclosure of their policies, operations and commitments to environmental, social and governance (ESG) best practice. Each company receives a percentage score as a measure of its transparency in relation to 119 ESG risk indicators across 10 categories, aligned with corporate reporting initiatives (including the UNGC, RSPO ACOP, CDP and GRI, etc.).

## Results continued

### Key things to note for investors

While there have been steady sustainability improvements in the sector over the last decade, there are a few key caveats for investors to note now and into the future. In order to accurately understand the current situation it is necessary to engage with key stakeholders in the palm oil production chain – workers, smallholders & independent suppliers, and indigenous communities on whose land the plantations are. We also recommend that audits to track progress in the future consult with these stakeholders.

**It is still very difficult to determine whether sustainability policies are being implemented, particularly by smallholders and suppliers.** Most companies, including those assessed in this research, have adopted NDPE sourcing policies. This has led directly to a reduction of deforestation linked to palm oil production. However, many smaller companies in their supply chain are not complying with the NDPE policies. In addition, public monitoring and reporting on compliance is rare with only a few companies launching real-time tracking systems. Regular, transparent and comprehensive reporting against all major elements of sustainability policies must be made standard practice for all palm-oil producers.

**Land acquisition and FPIC processes must be strengthened to protect the rights of indigenous land owners.** RSPO currently seeks to protect indigenous land rights itself by responding to public reports, and by facilitating formal grievances raised from other organisations and communities. However, these conflicts often last years without adequate resolution and some cases are closed due to the death or absence of the complainants. It is not clear whether communities have enough agency and resources to engage in the resolution process, especially when compared to a large company and the drivers for this require further investigation.

**Beyond implementation of existing policies, the perspective of indigenous communities needs to be included while defining commitments.** Besides fulfilling basic food and resource needs and environmental conservation priorities, many indigenous people have a deep emotional and spiritual connection with forests which is often not acknowledged in assessment methodologies, alienating people from their land.

**Risk assessment and management processes must be strengthened to protect the worker rights.** Modern slavery is unfortunately a reality of global palm oil production as highlighted by various civil society reports. While companies have commitments and policies to uphold human rights, there are few mechanisms to understand and assess the risk at different facilities. This lack of definition and monitoring puts workers especially casual or migrant workers at risk. Children and women are other vulnerable groups that should be monitored.

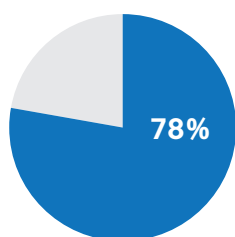




# United Plantations Berhad

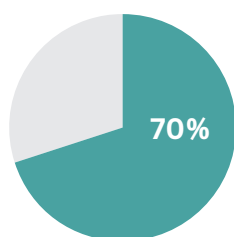
## Current state assessment

United Plantations Berhad is a medium sized plantation group in Malaysia (80%) with a small but growing interest in Indonesia (20%). With a little over 200,000 MT CPO production in 2018, it is the smallest company in this assessment. The plantation group structure is divided by United Plantations Berhad in Malaysia as well as 95% ownership of PT Suriya Sawit Sejati (PT SSS) in Indonesia. Its total cultivated landbank covers approximately 50,000 ha (90% palm oil) supported by 6,508 employees. The Malaysian operation has been fully certified under RSPO since 2008 and MSPO in 2018. Indonesian plantations are still in the process of getting RSPO certified. The first certified palm oil consignment to Europe in 2008 was sourced from United Plantations. United Plantations subsidiaries are engaged in downstream activities such as refining, producing, and packaging oils and fats based on certified palm oil.



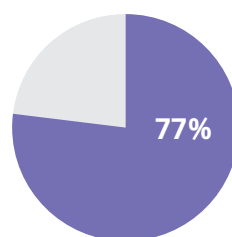
### ENVIRONMENTAL PERFORMANCE

United Plantations has had a strong NDPE policy in place since 2014, with new planting procedures in line with HCV and HCS and strong conservation measures. Management plans are in place with a GIS database and public targets. These policies are applied to suppliers through their self assessment. The company is committed to strong plantation management and pest management practices, however has not published its waste or water management plans. **On average, it demonstrates integrated environmental action.**



### SOCIAL PERFORMANCE

United Plantations' social policies are strong. However, the supporting plans and specific reports are generally not provided, which has held back their overall score. Again, smallholders are not yet fully compliant with policies and certifications, which is targeted for 2021. Currently none of their smallholders are RSPO certified. The company states that it is fully committed to FPIC, through an external consultant LINKS, however there are still some unresolved land disputes in Indonesia. **While there is a spread across all criteria, most activities fall between strategic and integrated action.**



### GOVERNANCE PERFORMANCE

United Plantations shows sustainability leadership, particularly in Malaysia where their plantations were certified by RSPO NEXT in 2017. All of its own production is traceable. However, their Indonesian operations are still lagging, with no national or international certification. This is expected by 2020. Some information is not fully available, including anti-corruption measures, reports of legal compliance and grievances, and smallholder land use maps. **The business appears to be moving from strategic towards integrated action.**

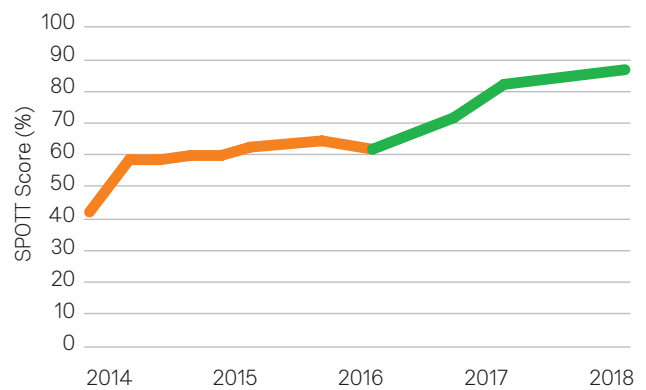
Environment	
Deforestation policy	Green
Deforestation policy/commitment implementation	Light Green
Biodiversity conservation policy	Green
Biodiversity policy/commitment implementation	Light Green
New peatlands	Yellow
Existing peatlands	Light Green
Soil management	Yellow
Burning	Green
Pest management	Light Green
Chemical management	Yellow
Waste management	Orange
Water management	Orange
GHG management	Light Green
Social	
Terms of employment	Yellow
Facilities	Orange
No forced labour	Light Green
Freedom of association	Light Green
Child welfare	Green
Gender equality	Green
Training & support	Yellow
Health & safety	Light Green
Labour rights violations	Light Green
Social impact	Light Green
FPIC processes	Yellow
Land conflict	Yellow
Food security	Yellow
Fair pricing	Yellow
Training & support	Yellow
Participation	Orange
Governance	
Sustainability policy & systems	Green
Memberships	Light Green
Certified supply	Light Green
Traceability	Green
Sustainability reporting	Yellow
Legal action/lawsuits	Yellow
Anti corruption policy & mechanisms	Light Green
Grievance mechanisms	Yellow

# United Plantations Berhad: 10 year assessment

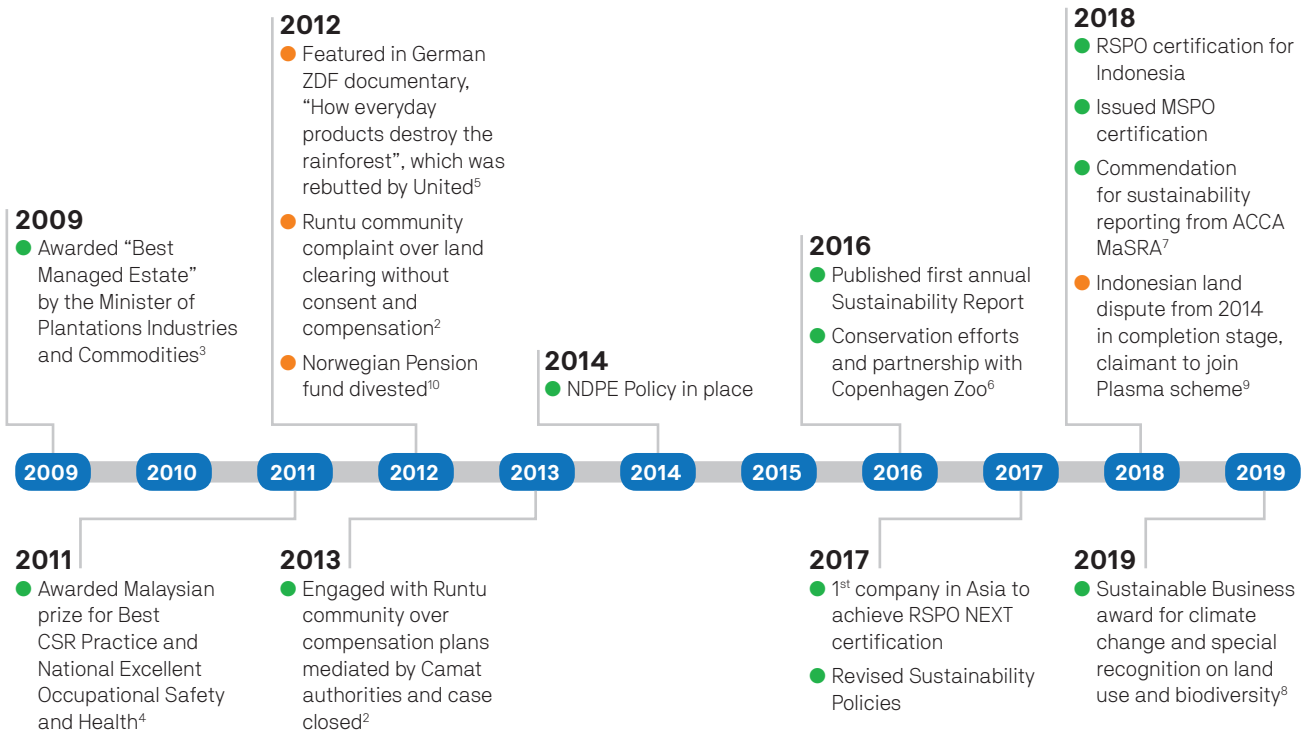
## PROGRESS

In Malaysia, United Plantations has a strong history of sustainability leadership. On 26 August 2008, it became the world's first company to have all Malaysian plantations RSPO certified and deliver the first certified palm oil shipment to Europe. These plantations were recertified in both 2013 and 2017. However, they have faced criticism for continuing with "business as usual" in Indonesia<sup>1</sup>. Certification in Indonesia is still in progress. The company had a zero burning policy and Good Agricultural Practice in place since 1989 and no new development on peat since 2010. There are examples of strong social sustainability over time, with the company being awarded for its OHS standards, corporate social responsibility practice and estate management. The company sees its green credentials as a major competitive advantage. In general, the sustainability performance of United Plantations appears to be on a steady upwards trajectory with near-term targets for further improvements over the coming years.

## SPOTT assessment results over time



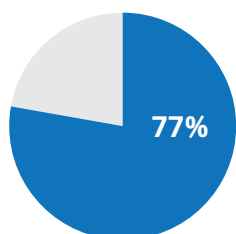
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# IOI Corporation Berhad (IOI)

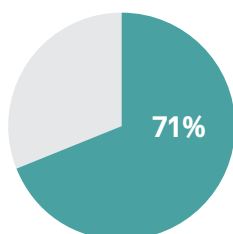
## Current state assessment

IOI's core business is plantations in Malaysia and Indonesia spread across 178,047 ha in 90 estates. Upstream activities include seed breeding, cultivation and crop oil extraction; and downstream resource-based manufacturing activities include palm oil refining, palm kernel extraction, oleochemicals and specialty fats and oils across 15 mills with products exported to more than 60 countries worldwide. Annual production of CPO is in excess of 800,000 tonnes. IOI employs more than 28,000 employees, with 71% male and 29% female employees.



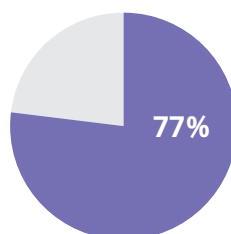
### ENVIRONMENTAL PERFORMANCE

IOI adheres to a NPDE policy and has adopted a HCS/landscape approach to its plantation planning. There are strong measures in place for peatland conservation and restoration in line with RSPO guidelines. Chemical management is quite advanced but waste and water management plans are not very well defined publicly. GHG reporting and monitoring is quite high. **Overall its performance for environmental sustainability is integrated moving towards systemic action.**



### SOCIAL PERFORMANCE

IOI has a strong set of policies to support decent work for employees, both local and migrant. They are developing internal audit processes to address labour rights concerns. Social development programs for children have been especially successful. IOI has strong processes for its social impact assessment and FPIC processes. There is a program in place for training and supporting smallholders, though they do not have many smallholders. Thus there is also limited action on food security and fair pricing initiatives with small holders and local communities. **They demonstrate strategic action with respect to social sustainability.**



### GOVERNANCE PERFORMANCE

IOI has a dedicated Sustainable Palm Oil Policy that is supported by a series of other environment and social policies. It has an efficient multi-channel grievance mechanism that allows for anonymity. There is currently one outstanding grievance that IOI is dealing with through FPIC processes. They regularly report based on the GRI guidelines in line with the SDGs. **IOI's governance performance is integrated, that sets the stage for a strong sustainability practice.**

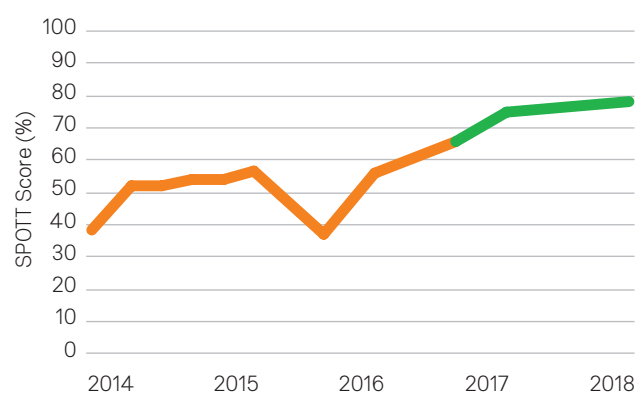
Environment	
Deforestation policy	
Deforestation policy/commitment implementation	
Biodiversity conservation policy	
Biodiversity policy/commitment implementation	
New peatlands	
Existing peatlands	
Soil management	
Burning	
Pest management	
Chemical management	
Waste management	
Water management	
GHG management	
Social	
Terms of employment	
Facilities	
No forced labour	
Freedom of association	
Child welfare	
Gender equality	
Training & support	
Health & safety	
Labour rights violations	
Social impact	
FPIC processes	
Land conflict	
Food security	
Fair pricing	
Training & support	
Participation	
Governance	
Sustainability policy & systems	
Memberships	
Certified supply	
Traceability	
Sustainability reporting	
Legal action/lawsuits	
Anti corruption policy & mechanisms	
Grievance mechanisms	

## IOI Corporation Berhad (IOI): 10 year assessment

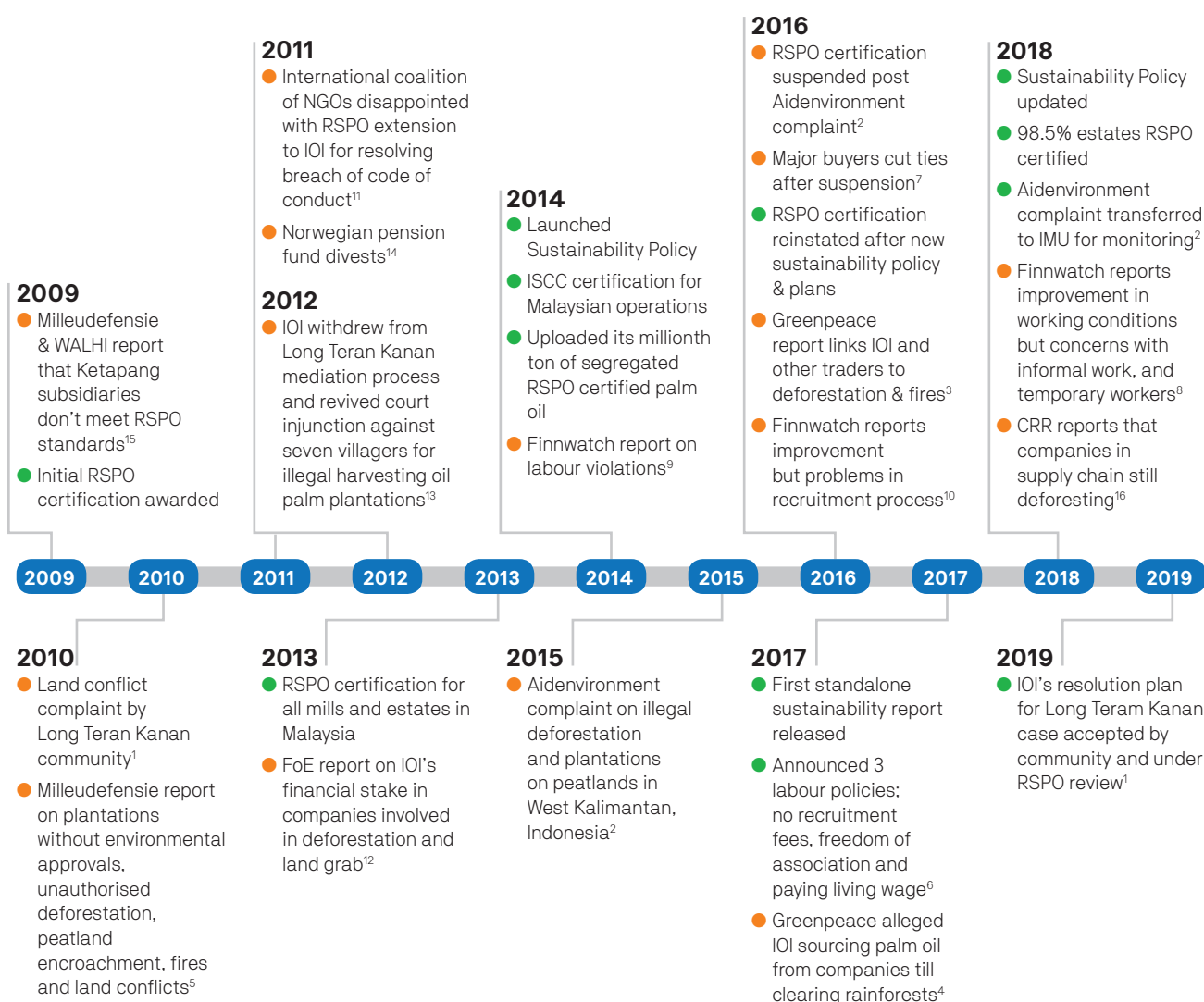
### PROGRESS

Over the last few years, IOI has shown a lot of growth, especially on plantation and conservation related aspects. Following IOI's RSPO certification suspension in 2016, the company refocused its approach to stakeholder engagement and communication. While they did have sustainability policies in place earlier (2014), they have been recently updated (2017-18). Over time there is more visibility of their plans and achievements. From 2017, IOI has been improving its labour practices with its initiation of standalone sustainability reporting. IOI has been working with the community, to resolve a land conflict first reported in 2010, in line with RSPO guidelines employing FPIC processes. RSPO traceability certification started in 2009 with a plan to 100% by 2013 (deferred to 2020). In 2019, 98.5% of the estates were RSPO certified, highlighting their commitment to the cause.

### SPOTT assessment results over time



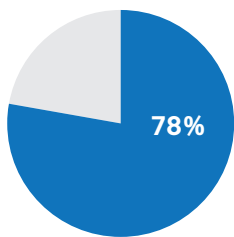
This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.



# Sime Darby Plantation (SDP)

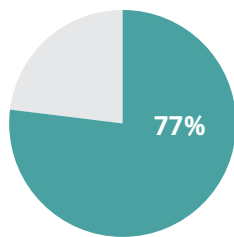
## Current state assessment

Formerly under multinational conglomerate Sime Darby Berhad (SDB), Sime Darby Plantation (SDP) was listed on Bursa Malaysia on 30 November 2017, following a strategic demerger to create a “pure play” entity. As a globally integrated plantation company, SDP is involved in the full spectrum of the palm oil value chain, from upstream to downstream palm oil activities, R&D, renewables and agribusiness. SDP has 630,000 ha oil palm plantations. Upstream operations encompass 250 estates and 73 mills located in Malaysia, Indonesia, PNG, Solomon Islands, and Liberia. Global operations across 17 countries are supported by 97,000 employees. SDP is the world’s largest oil palm plantation company by planted area, accounting for about 4% of total global production of CPO with an annual production of over 2.6m MT(2018) and 20% of the world market share for Certified Sustainable Palm oil (CSPO)<sup>1</sup>.



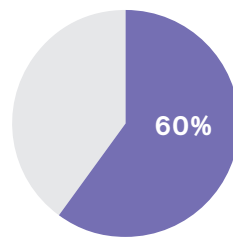
### ENVIRONMENTAL PERFORMANCE

SDP has strong deforestation and biodiversity conservation commitments. They launched an open access online tool to trace palm oil supply to the mill level to create a deforestation free supply chain. Sustainable agricultural, IPM and no burning practices were introduced in 1970-1990. The no peat plantation policy has been in place since 2012. They have a strong waste management program, however there is no publically available waste management plan or targets. **Overall its environmental sustainability performance displays integrated action.**



### SOCIAL PERFORMANCE

SDP has a suite of policies to support their employees – migrant and permanent. SDP directly recruits migrant workers, avoiding agencies and agents. They issue annual disclosures on efforts to address human trafficking in their supply chains. Currently they have two open conflict cases that are under RSPO review. All their smallholders in PNG and Solomon islands are RSPO certified and the company is working with other regions to achieve similar targets. **Overall the social performance also demonstrates integrated action.**



### GOVERNANCE PERFORMANCE

SDP started their biannual standalone sustainability reporting in 2011. Their sustainability policy was established in 2008. The Main Board is accountable for the group’s sustainability commitments and performance through the establishment of a Sustainability Committee. SDP is 97% RSPO certified and 100% MSPO certified. Their grievance register is online with a summary of actions and findings. SDP is also working with other stakeholders. **The governance performance is aligned with integrated action.**

Environment	
Deforestation policy	
Deforestation policy/commitment implementation	
Biodiversity conservation policy	
Biodiversity policy/commitment implementation	
New peatlands	
Existing peatlands	
Soil management	
Burning	
Pest management	
Chemical management	
Waste management	
Water management	
GHG management	
Social	
Terms of employment	
Facilities	
No forced labour	
Freedom of association	
Child welfare	
Gender equality	
Training & support	
Health & safety	
Labour rights violations	
Social impact	
FPIC processes	
Land conflict	
Food security	
Fair pricing	
Training & support	
Participation	
Governance	
Sustainability policy & systems	
Memberships	
Certified supply	
Traceability	
Sustainability reporting	
Legal action/lawsuits	
Anti corruption policy & mechanisms	
Grievance mechanisms	

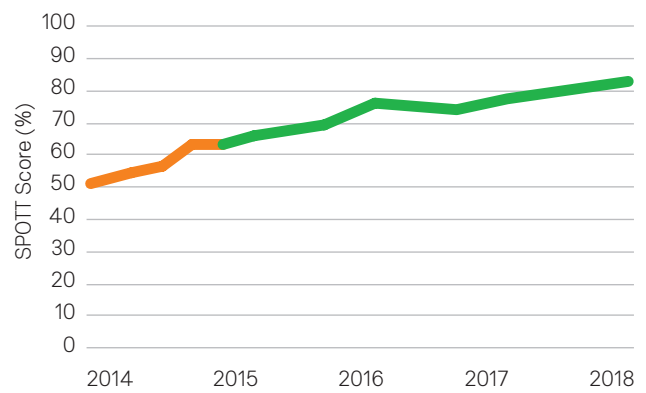
# Sime Darby Plantation (SDP): 10 year assessment

## PROGRESS

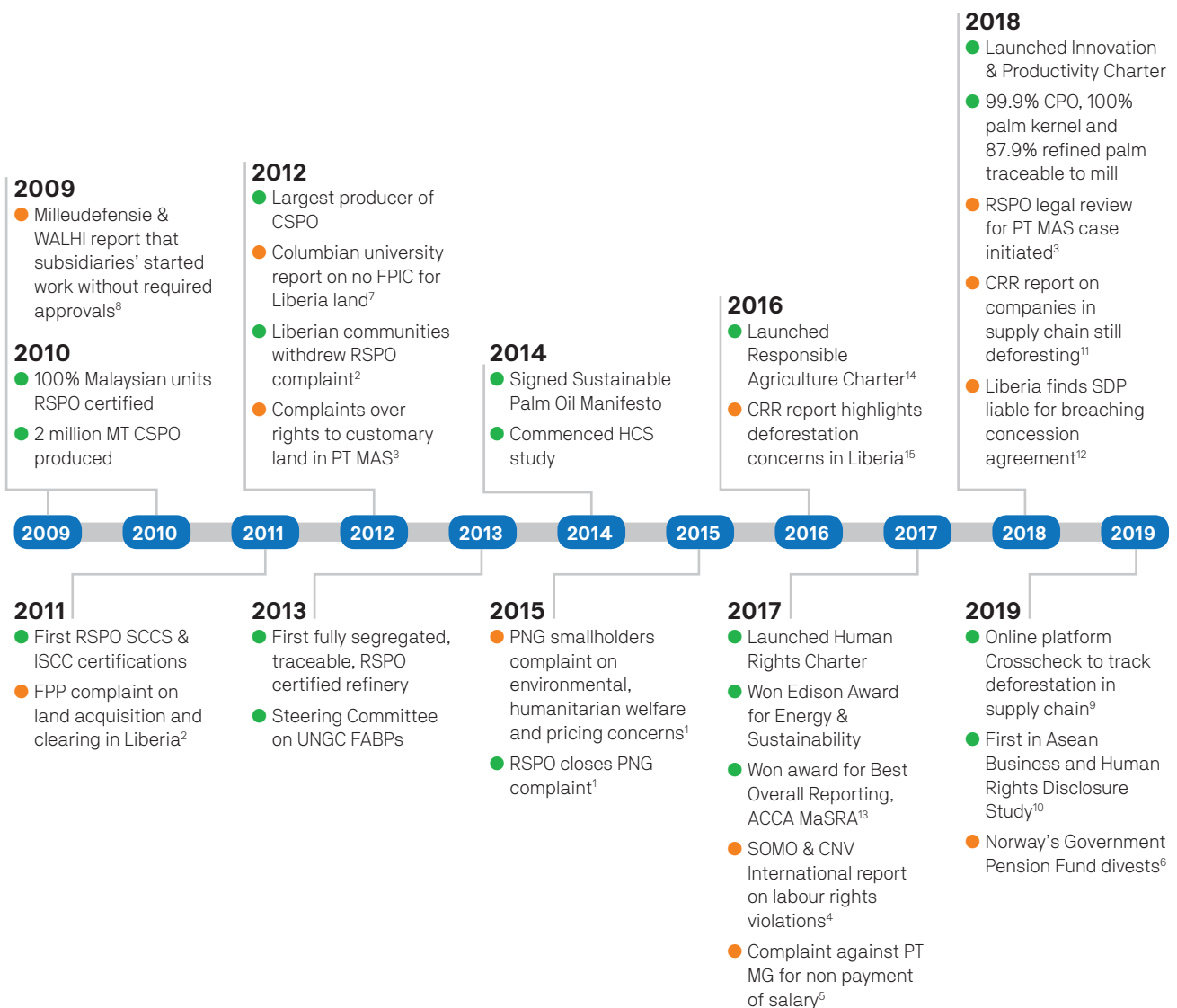
SDP initiated their sustainability practices in the 1970s, and have been leaders in the industry’s sustainability movement. Starting from 2008, they have achieved almost complete RSPO traceability certification to mill. They have also launched various policies and monitoring mechanisms to track environmental and social concerns. Over the years they have dealt with complaints from communities and NGOs on their handling of labour and forest issues, with one legal review active under RSPO. They are currently engaged with the communities in Liberia to resolve land rights issues through dialogue. In general they seem to have been improving their processes and are a front runner in terms of sustainability performance in the sector.

**Note:** There have been allegations against SDP on their rubber plantations.

## SPOTT assessment results over time



This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.

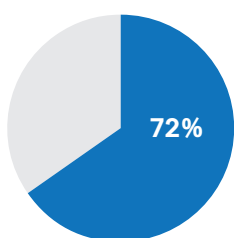




# Wilmar International Limited (Wilmar)

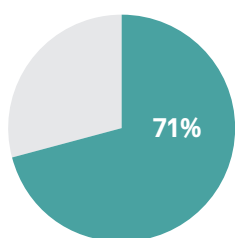
## Current state assessment

Wilmar International Limited one of the world’s largest palm oil plantation owners, with 230,409 ha of plantations in Indonesia (67%), East Malaysia (25%) and Africa (8%). Wilmar owns an additional 46,000ha in Africa through joint ventures, and manages a further 184,000 ha through smallholder schemes. The company as a whole spans 50 countries and regions with a workforce of over 90,000 people across the palm oil supply chain and in other agribusiness sectors. Wilmar centres its sustainability strategy around its NDPE Policy, which has been in place since 2013.



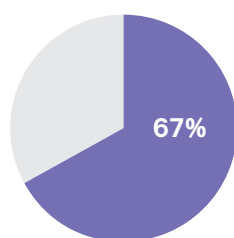
### ENVIRONMENTAL PERFORMANCE

Wilmar’s NDPE policy has been in place since 2013 and HCV assessment since 2008, however the key issue has been compliance by suppliers and smallholders. There have been 38 deforestation grievances filed against the company since 2018. The company has a target of zero deforestation across supply chain 2020 onwards, halting supply from non-compliant suppliers from 2019. **Wilmar has a wide range of scores across the indicators, with the average sitting between strategic and integrated action.**



### SOCIAL PERFORMANCE

Wilmar scores low on its social sustainability metrics, generally in relation to its smallholders and suppliers and how these impact FPIC concerns. We could not see evidence for fair pricing for smallholders or a strong and consistent SEIA. Wilmar’s policies are generally strong however the evidence of actions (e.g. specific reports, plans and targets) that support these are not made public, therefore are not possible to assess across many metrics. **In general, the company is performing at a strategic level for social action.**



### GOVERNANCE PERFORMANCE

Wilmar has been a member of RSPO since 2004 and currently has 76% of its plantations certified (681,000MT). The company has a strong grievance procedure in place, with transparent reporting of those filed against the company. There are still regular allegations raised against Wilmar’s suppliers and smallholders, largely related to deforestation and FPIC violations, and there are currently two RSPO grievances under investigation. **Wilmar is close to integrated action on sustainability governance, which can be achieved if traceability is improved.**

Environment	
Deforestation policy	
Deforestation policy/commitment implementation	
Biodiversity conservation policy	
Biodiversity policy/commitment implementation	
New peatlands	
Existing peatlands	
Soil management	
Burning	
Pest management	
Chemical management	
Waste management	
Water management	
GHG management	
Social	
Terms of employment	
Facilities	
No forced labour	
Freedom of association	
Child welfare	
Gender equality	
Training & support	
Health & safety	
Labour rights violations	
Social impact	
FPIC processes	
Land conflict	
Food security	
Fair pricing	
Training & support	
Participation	
Governance	
Sustainability policy & systems	
Memberships	
Certified supply	
Traceability	
Sustainability reporting	
Legal action/lawsuits	
Anti corruption policy & mechanisms	
Grievance mechanisms	

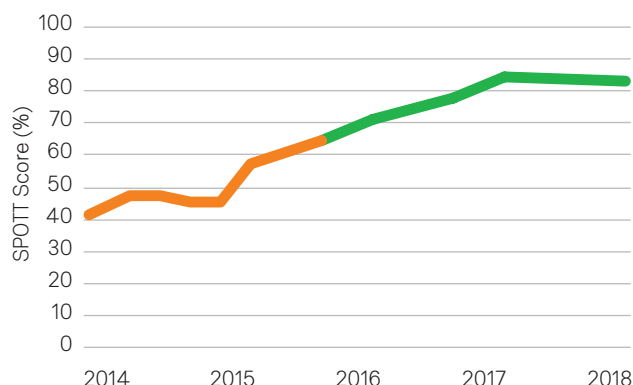


# Wilmar International Limited (Wilmar): 10 year assessment

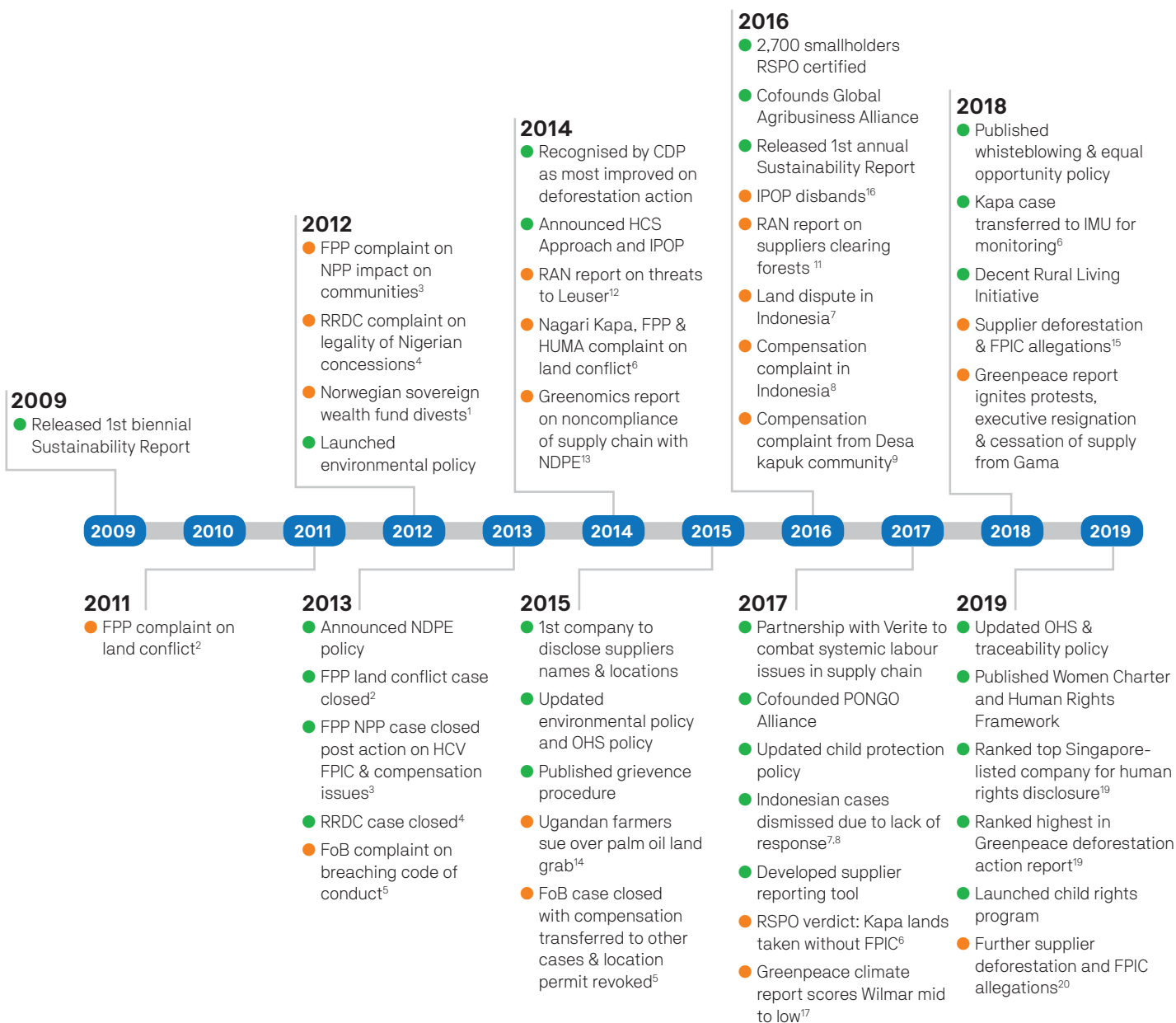
## PROGRESS

As a larger company, there are substantially more sustainability issues raised in the media, both positive and negative. However, over the past 10 years Wilmar has been a sustainability leader in many ways. The critical gap is still whether its suppliers are responsible for ongoing deforestation or abusing human rights with multiple RSPO complaints filed almost annually. In the past five years, Wilmar has been working to improve supplier and smallholder compliance with its policies, and has a target for zero deforestation across the supply chain 2020 onwards. If this is achieved, it will dramatically improve its performance against our framework.

## SPOTT assessment results over time



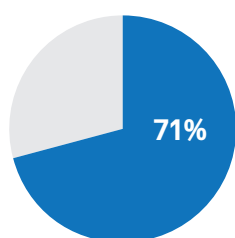
This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.



# Kuala Lumpur Kepong Berhad (KLK)

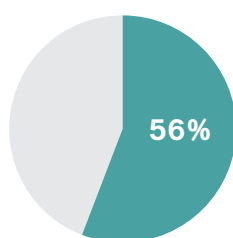
## Current state assessment

KLK is the 3<sup>rd</sup> largest Malaysian palm oil producer with approximately 210,000 ha plantations in Malaysia and Indonesia. KLK produces and processes palm products, natural rubber, and cocoa on its plantations. The Company, through its subsidiaries, mills and refines oil palm products, cultivates ramie, and manufactures oleochemicals, soap, esters, latex gloves, toiletries, and parquet flooring products. KLK employs approximately 40,000 staff.



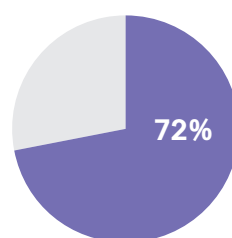
### ENVIRONMENTAL PERFORMANCE

KLK has a public NDPE and no burning policy, with a commitment to support smallholders to zero deforestation. There is reference to a number environmental management plans (waste and water management, conservation approach), which are not made public to evaluate targets and performance. The SPOTT assessment of KLK also notes that there is no public landbank and that there is a 'moving target' for emissions reduction. Agricultural practices are strong. **Most commonly, KLK demonstrates strategic action towards the environment.**



### SOCIAL PERFORMANCE

KLK has a strong set of policies to support decent work for employees. However, there is not a clear breakdown of the workforce including temporary workers and union representation. The SEIA and the number of grievances related to discrimination are also not published. While the OHS plan is strong, there are questions raised around recent fatalities. FPIC policies are in place, however there seem to be regular conflicts. There is no reporting of smallholder compliance with company policy. **In general, KLK is moving from incremental to strategic action.**



### GOVERNANCE PERFORMANCE

Since 2016, KLK has published annual sustainability reports in line with GRI standards. In 2019 RAM Consultancy assigned KLK a gold sustainability rating. KLK has been a member of RSPO since 2004 and has approximately 40% of its supply certified. While the business espouses traceability, there are still significant gaps that will be addressed by Dec 2020. Performance against this target should be reviewed. All published grievances appear to be resolved. **The company demonstrates strategic action towards sustainability governance.**

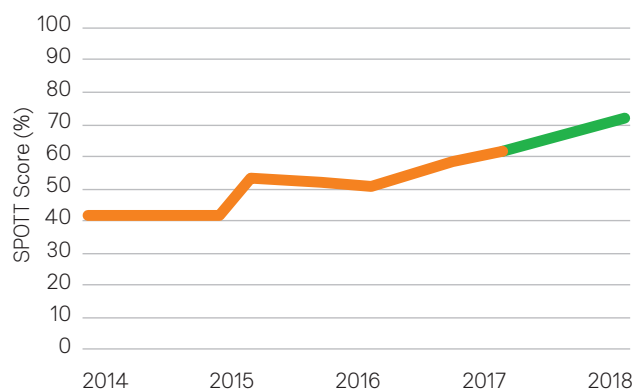
Environment	
Deforestation policy	
Deforestation policy/commitment implementation	
Biodiversity conservation policy	
Biodiversity policy/commitment implementation	
New peatlands	
Existing peatlands	
Soil management	
Burning	
Pest management	
Chemical management	
Waste management	
Water management	
GHG management	
Social	
Terms of employment	
Facilities	
No forced labour	
Freedom of association	
Child welfare	
Gender equality	
Training & support	
Health & safety	
Labour rights violations	
Social impact	
FPIC processes	
Land conflict	
Food security	
Fair pricing	
Training & support	
Participation	
Governance	
Sustainability policy & systems	
Memberships	
Certified supply	
Traceability	
Sustainability reporting	
Legal action/lawsuits	
Anti corruption policy & mechanisms	
Grievance mechanisms	

# Kuala Lumpur Kepong Berhad (KLK): 10 year assessment

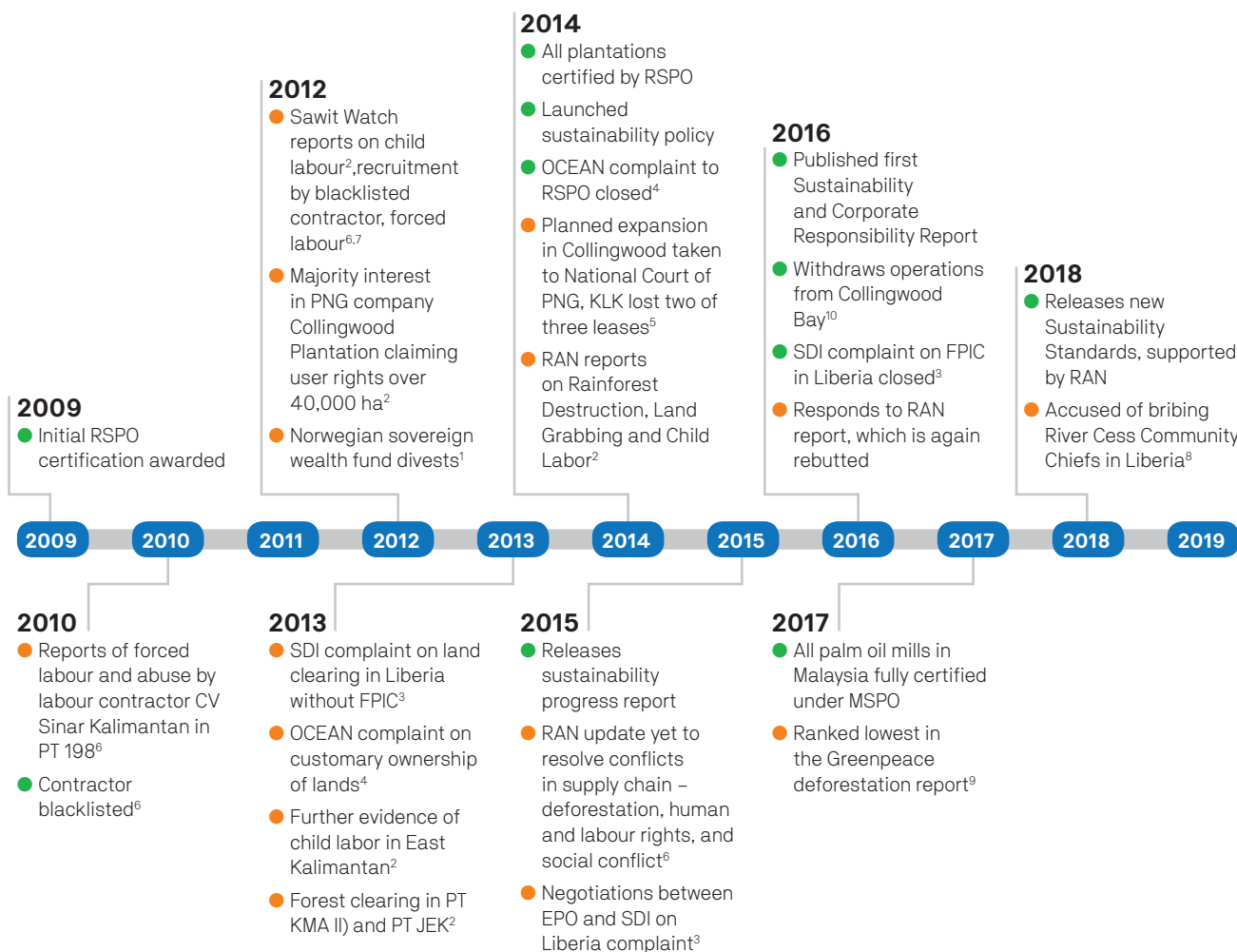
## PROGRESS

KLK has been one of the most highly criticised companies for conflicts with communities in Liberia; threatened social conflict and deforestation in Papua New Guinea; and unresolved labour and deforestation risks in Indonesian and global operations. After facing years of public criticism and campaigning from civil society, KLK has moved to new sustainability standards, pledging its commitment to responsibly produce and source palm oil. But the real test will be in implementation. As mentioned in the current state assessment, the key elements that should be reviewed going forward include: the establishment of a public landbank; shifting GHG emission reduction targets; publishing and performance against social sustainability measures; and the % of certified output.

## SPOTT assessment results over time



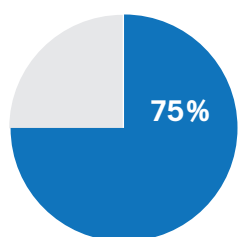
This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.



# London Sumatra (Lonsum)

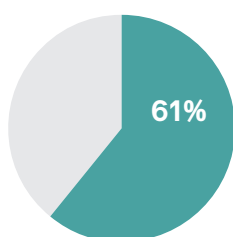
## Current state assessment

Lonsum is a subsidiary of PT Salim Ivomas Pratama Tbk (SIMP), which is a subsidiary of Indofood Agri Resources Ltd, a plantation arm of Indofood Sukses Makmur Tbk which is itself controlled by Anthoni Salim, owner of the Salim group. Lonsum manages 150,000 ha through 38 company-owned and 14 smallholder farmer estates of planted oil palm, rubber, tea and cocoa plantations spread across Indonesia’s four largest islands (Sumatra, Java, Kalimantan and Sulawesi), with palm oil being the company’s primary commodity over 96,000 ha. Lonsum operates 12 palm oil mills in Sumatra and Kalimantan, with a total annual FFB processing capacity of up to 2.6 million tonnes. The group has a total of 15,303 permanent employees.



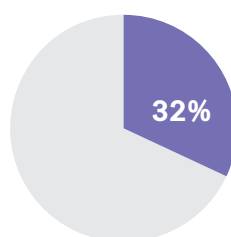
### ENVIRONMENTAL PERFORMANCE

Lonsum has been achieving zero deforestation since the last 2 years and no new peat plantations since 2013. 100% plantations have HCV assessments. There is an opportunity now to plan and implement restoration and conservation strategies. Lonsum also has reported on waste, waste and GHG emissions and the reductions over time. They have adopted integrated pest management practices. However there is no evidence of appropriate management and handling training. **Their sustainability actions are strategic.**



### SOCIAL PERFORMANCE

Lonsum has a set of policies to support decent work for employees. However, there have been various allegations on labour violations and its RSPO certification was suspended due to non-compliance with labour laws. The company reports that processes are in place for SEIA and FPIC however there is limited published information. While the OHS plan is strong, there are questions raised around recent fatalities. There is a programme to help smallholders get ISPO certified (now having left RSPO). **They display incremental actions in this space.**



### GOVERNANCE PERFORMANCE

While Indofood Agri (the parent company) has had a sustainability policy in place since 2013, sustainability does not seem well embedded in governance, which has received negative publicity. Lonsum was a member of RSPO since 2004 but resigned from RSPO membership earlier this year following disagreements with the Complaints Panel on how the labour violations case was handled. Lonsum is in the process of getting 100% ISPO certified by 2019 with 77% already certified. There is no published information on open grievances other than the matter with RSPO. **Thus, their governance actions are also incremental.**

Environment	
Deforestation policy	Green
Deforestation policy/commitment implementation	Yellow
Biodiversity conservation policy	Green
Biodiversity policy/commitment implementation	Yellow
New peatlands	Green
Existing peatlands	Yellow
Soil management	Yellow
Burning	Green
Pest management	Green
Chemical management	Yellow
Waste management	Yellow
Water management	Yellow
GHG management	Green
Social	
Terms of employment	Green
Facilities	Orange
No forced labour	Orange
Freedom of association	Green
Child welfare	Green
Gender equality	Green
Training & support	Yellow
Health & safety	Green
Labour rights violations	Red
Social impact	Yellow
FPIC processes	Yellow
Land conflict	Orange
Food security	Yellow
Fair pricing	Yellow
Training & support	Green
Participation	Orange
Governance	
Sustainability policy & systems	Yellow
Memberships	Orange
Certified supply	Orange
Traceability	Red
Sustainability reporting	Yellow
Legal action/lawsuits	Red
Anti corruption policy & mechanisms	Yellow
Grievance mechanisms	Orange

## London Sumatra (Lonsum): 10 year assessment

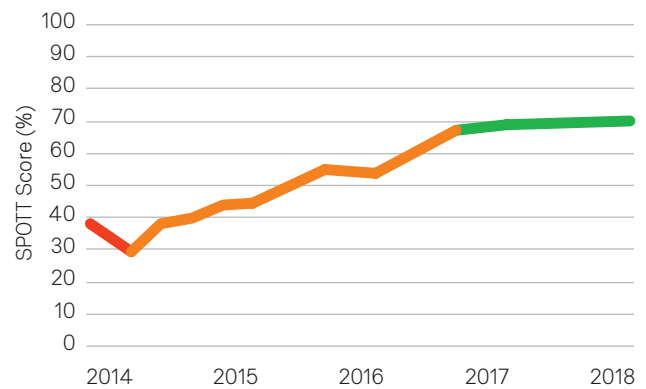
### PROGRESS

Over the last 5 years, Lonsum appears to have made some progress on no deforestation and no peat plantations. The first partial certification from RSPO was received in 2009. There seems to be an upward movement since then with a 100% target for 2016 that moved to 2019. Currently they are pursuing ISPO certification.

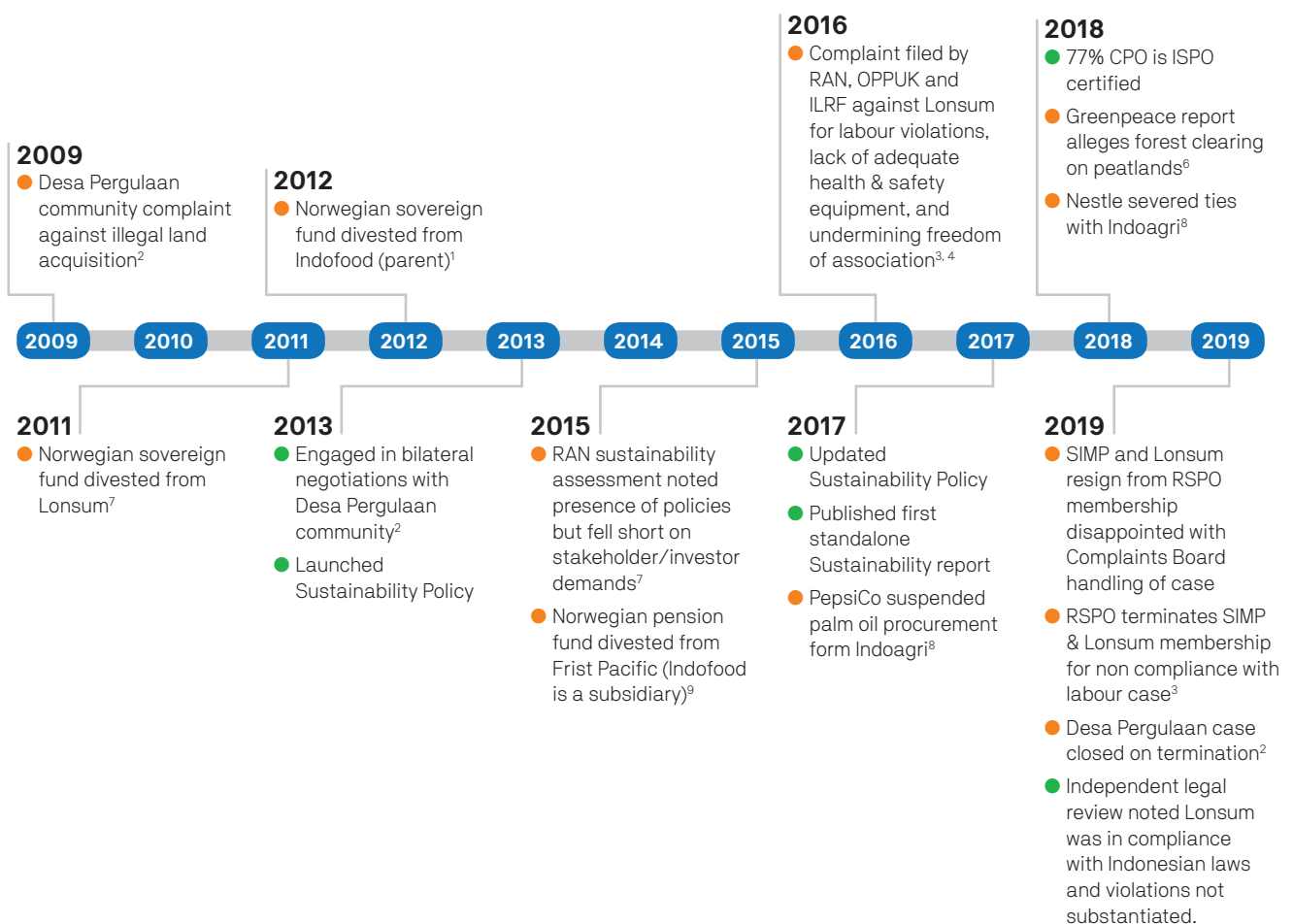
However, in 2016, complaints of over 20 violations of the RSPO's standard and 10 violations of Indonesian labour laws were raised. In early 2019, following an audit, RSPO ordered the suspension of their sustainability certificates. Unhappy with how the audit was handled, SIMP and Lonsum resigned from RSPO membership. Shortly after RSPO issued a notice to terminate their membership.

There is limited historic reporting on social performance. Lonsum currently has community programmes across 100% of its estates. While the annual reports (available since 2009) have some sustainability reporting, the sustainability policy and standalone reporting only began in 2017. Compared to other companies, Lonsum does not have a strong sustainability track record.

### SPOTT assessment results over time



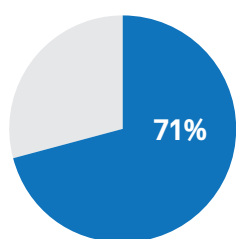
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# FGV Holdings Berhad

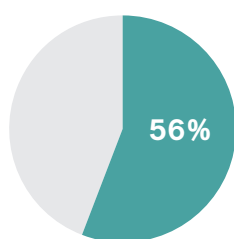
## Current state assessment

Incorporated in 2007 as a private limited company, FGV initially operated as the commercial arm of Federal Land Development Authority (FELDA) prior to its listing on Bursa Malaysia in 2012 as Felda Global Ventures Holdings Berhad. FELDA was set up to provide land for the landless and qualified rural poor and to resettle into areas that were to be developed and productively cultivated to provide income for families. The settlers were resettled in structurally managed schemes. FGV's palm upstream is their largest revenue earner and forms the core of the company, with a total landbank of 439,725 Ha in Malaysia and Indonesia, producing around 3 million tonnes of CPO annually. Downstream activities include refining, processing and marketing activities related to the conversion into value-added products. 30% of the 13 million tonnes FFB comes from FGV plantations and the balance from FELDA settlers and third parties.



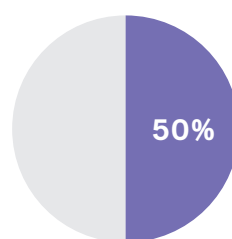
### ENVIRONMENTAL PERFORMANCE

FGV introduced a group sustainability policy in 2017, though it had NDPE commitments in 2015. In spite of these policies, there have been complaints about deforestation. A significant achievement is the 70% reduction in GHG emissions. There is activity in improving operations efficiencies in terms of chemical use, waste and water management. Public management plans were not available. **Overall their environmental performance is aligned with strategic action, with an aim to move towards integrated.**



### SOCIAL PERFORMANCE

FGV has employee policies in place, but has been accusations of labour and human rights violations confirmed through RSPO and internal audits. The updated policy reinforces commitment to labour standards, community rights, non-discrimination, gender equality and livelihood. Social assessment and FPIC processes are followed. Outstanding land conflicts are under FELDA not FGV. They have a smallholder programme in place, but there are reports of unsettlement regarding pricing and support. **FGV's social sustainability performance is approaching strategic action.**



### GOVERNANCE PERFORMANCE

FGV has taken steps in the last two years to strengthen their sustainability policies. This is following the voluntary withdrawal of RSPO certification and the sanctions imposed on certain mills for RSPO standard violations. They have a biannual sustainability reporting system. However, their RSPO traceability certification is still low. The grievance mechanism is embedded in FGV's whistleblowing channel. **FGV's governance sustainability is still only incremental, with its responsible sourcing compliance driven.**

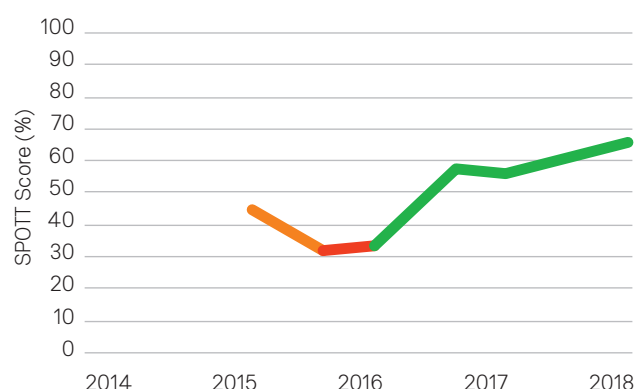
Environment	
Deforestation policy	
Deforestation policy/commitment implementation	
Biodiversity conservation policy	
Biodiversity policy/commitment implementation	
New peatlands	
Existing peatlands	
Soil management	
Burning	
Pest management	
Chemical management	
Waste management	
Water management	
GHG management	
Social	
Terms of employment	
Facilities	
No forced labour	
Freedom of association	
Child welfare	
Gender equality	
Training & support	
Health & safety	
Labour rights violations	
Social impact	
FPIC processes	
Land conflict	
Food security	
Fair pricing	
Training & support	
Participation	
Governance	
Sustainability policy & systems	
Memberships	
Certified supply	
Traceability	
Sustainability reporting	
Legal action/lawsuits	
Anti corruption policy & mechanisms	
Grievance mechanisms	

## FGV Holdings Berhad Holdings: 10 year assessment

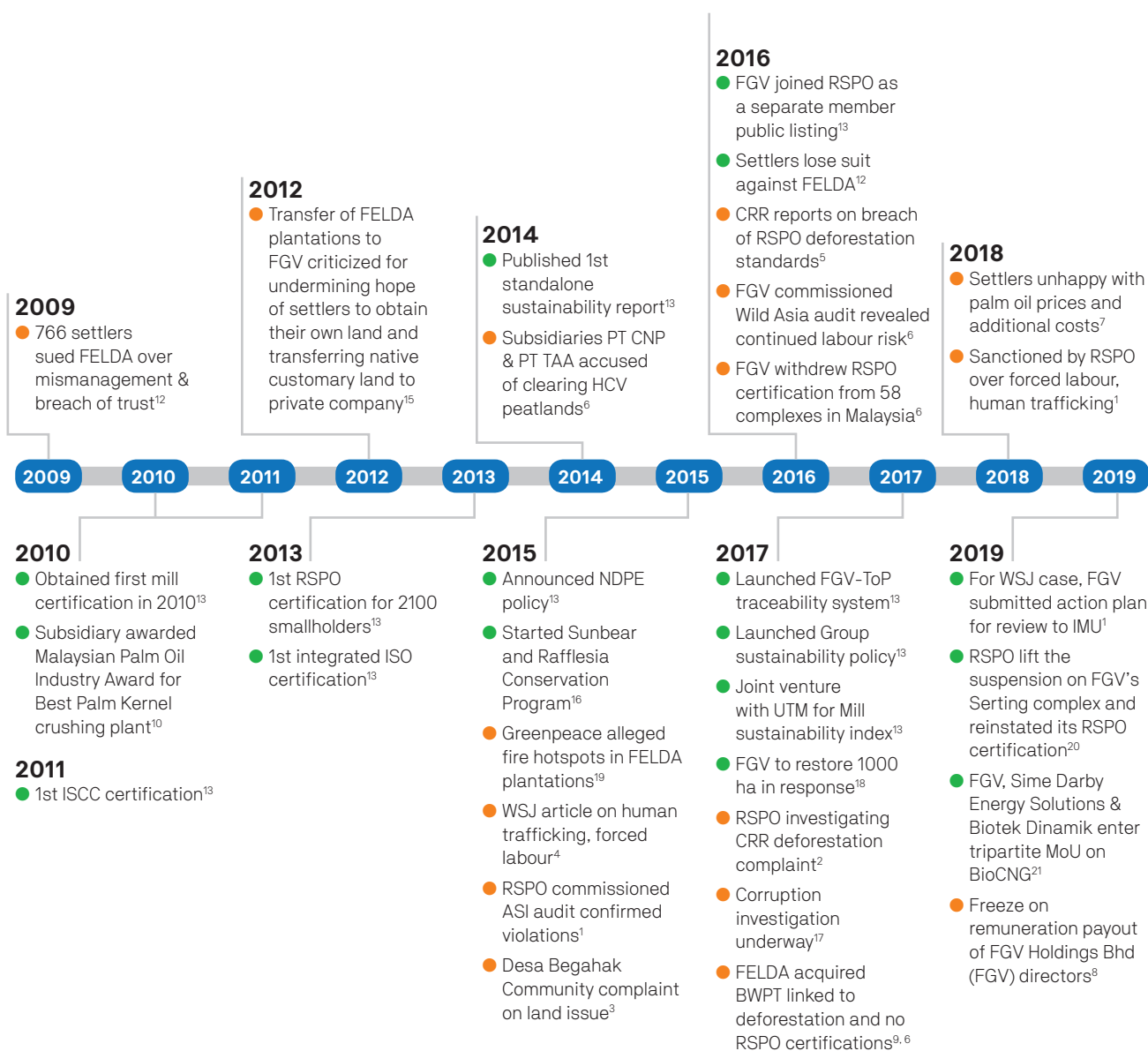
### PROGRESS

Since 2004, FGV's RSPO membership was together with FELDA. Following the public listing of the FGV Group, FGV joined as a separate RSPO member in December 2016. Over the last few years, there have been multiple allegations of environmental and labour violations in spite of their policies. FGV has been under pressure from NGOs, RSPO and communities to resolve these concerns. Some of these are still under investigation. There have also been concerns with FGV's acquisitions and their non conformity to sustainability policies and RSPO standards. While FGV has made slow progress in improving sustainability over the past few years, currently they are under financial stress and it is anticipated that their sustainability performance might suffer.<sup>14</sup>

### SPOTT assessment results over time



This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.

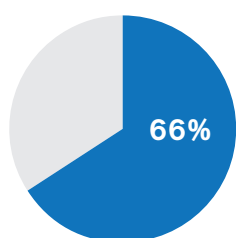




# Astra Agro Lestari (AAL)

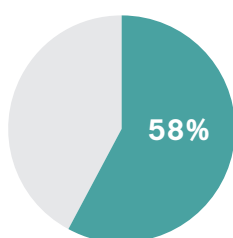
## Current state assessment

Astra Agro Lestari (AAL) is one of the largest palm oil producers in Indonesia. They started the cultivation of oil palm plants in 1984 and have a total management area of 297,011 ha spread across Sumatra, Kalimantan and Sulawesi. As of 2018, AAL has cooperated with 74,860 oil palm farmers who joined in 2,736 farmer groups. To maintain business continuity, in addition to managing oil palm plantation land, the Company also develops related downstream industries. AAL employs 47,218 people.



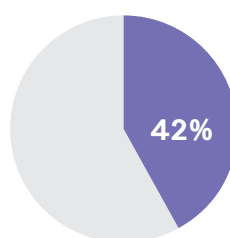
### ENVIRONMENTAL PERFORMANCE

AAL has made a strong environmental commitment through its sustainability policy and sustainability framework. **The policies and monitoring for the deforestation and plantation management aspects showcase an integrated approach to sustainability.** While there appears to be activity and progress on operational efficiencies like waste, water and emissions, it is not obvious if it is backed by a time bound plan with targets and indicators. **These aspects are more in line with a strategic approach to sustainability.**



### SOCIAL PERFORMANCE

AAL has strong reporting on its support programs for smallholders and independent suppliers. They regularly run socialization workshops and partnership programmes to help them. While the need has been identified, this support does not extend to economic aspects. While labour policies are well articulated, the implementation/ monitoring of these policies is not apparent. Similarly with FPIC process, the policy demonstrates its commitment, reporting on progress is not as clear. **Overall, it places AAL on an incremental sustainability level.**



### GOVERNANCE PERFORMANCE

AAL has consciously opted not to be part of the RSPO, instead develop its own sustainability framework based on the aspects identified as material to internal and external stakeholders. The policy seems well integrated within the company with accountability established at different levels of management. AAL is part of the ISPO and PROPER certifications, with 100% traceability to mill established for a majority of its suppliers. **They appear to be moving from a strategic to an integrated level of sustainability governance.**

Environment	
Deforestation policy	
Deforestation policy/commitment implementation	
Biodiversity conservation policy	
Biodiversity policy/commitment implementation	
New peatlands	
Existing peatlands	
Soil management	
Burning	
Pest management	
Chemical management	
Waste management	
Water management	
GHG management	
Social	
Terms of employment	
Facilities	
No forced labour	
Freedom of association	
Child welfare	
Gender equality	
Training & support	
Health & safety	
Labour rights violations	
Social impact	
FPIC processes	
Land conflict	
Food security	
Fair pricing	
Training & support	
Participation	
Governance	
Sustainability policy & systems	
Memberships	
Certified supply	
Traceability	
Sustainability reporting	
Legal action/lawsuits	
Anti corruption policy & mechanisms	
Grievance mechanisms	

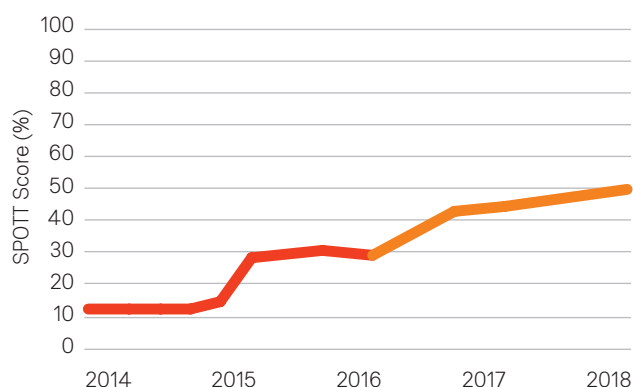


## Astra Agro Lestari (AAL): 10 year assessment

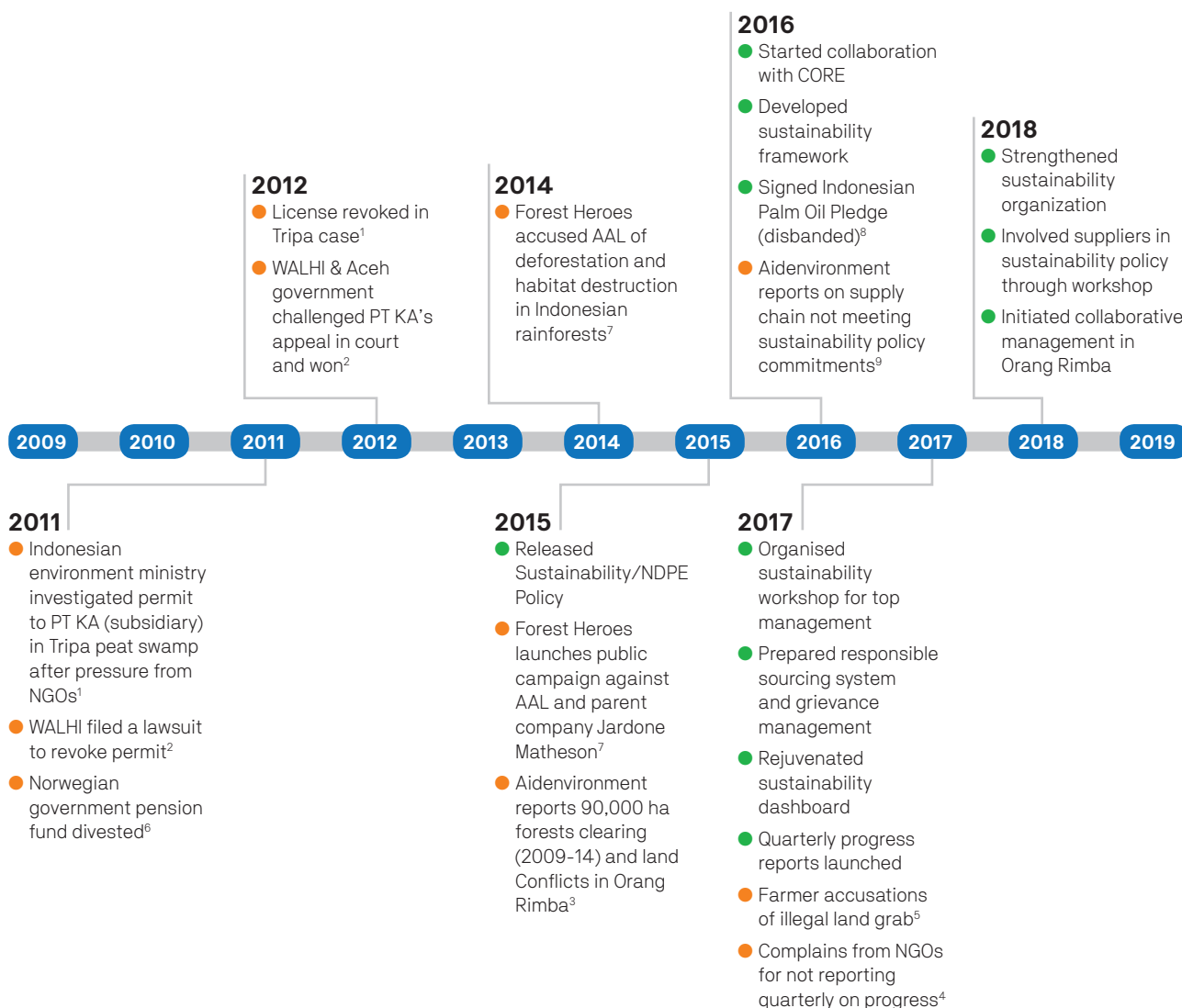
### PROGRESS

AAL has been criticised for not joining the RSPO and for accusations of habitat destruction and deforestation. It is one of the few large producers that are not a RSPO member. Following a public campaign in 2015, they have made great strides, in owning their sustainability policy and initiatives. AAL has been charting its own sustainability course by developing a proprietary framework based on the SDGs and GRI principles. While still not joining the RSPO, they are seeking ISPO certification and working with NGOs and research organisations to establish better management practices. They have started the process to manage the land conflict in Organ Rimba, that has been contested for over 30 years.

### SPOTT assessment results over time



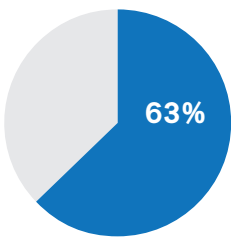
This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.



# Genting Plantations (GENP)

## Current state assessment

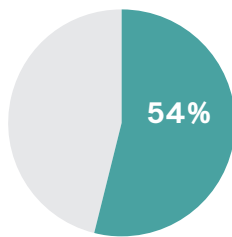
From a modest 13,700 ha in 1980, Genting Plantations' (GENP) landbank has grown to 247,400 ha currently, spread over Peninsular Malaysia, Sabah and Indonesia. As part of its upstream plantation operations, GENP has also invested in 11 oil mills in Malaysia & Indonesia with a combined capacity of 550 metric tonnes per hour. In 2014, GENP embarked on a journey that will see the Company transform into a fully integrated palm oil producer with downstream refineries.



### ENVIRONMENTAL PERFORMANCE

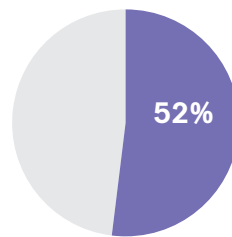
GENP committed to adopting the HCV approach in 2018 and has zero burning commitments since the 1990s. However its no deforestation and peat policies are less defined. GENP has strong waste and water management practices and reporting. There was no evidence of well defined plans for any operational efficiency.

**Overall the environmental sustainability performance displays a transition into the strategic level.**



### SOCIAL PERFORMANCE

GENP has a range of social policies to cover aspects of forced labour, child labour, decent work, human rights, etc. There is evidence of some support for smallholders, however only a small number seem to have progressed on to certification. GENP has made a commitment to following FPIC processes for land acquisition. While there is evidence of policies, reporting on implementation is lacking. **Overall the social performance is in line with compliance led action.**



### GOVERNANCE PERFORMANCE

GENP started their annual standalone sustainability reporting in 2010. However policies on environmental and social sustainability have been added in the last few years. They are included in the 2017 and 2018 report but not as standalone policies. GENP is currently pursuing traceability certification from RSPO, ISPO and MSPO, but have not made huge strides, except for 100% ISCC certification. **The governance performance also is transitioning into strategic action.**

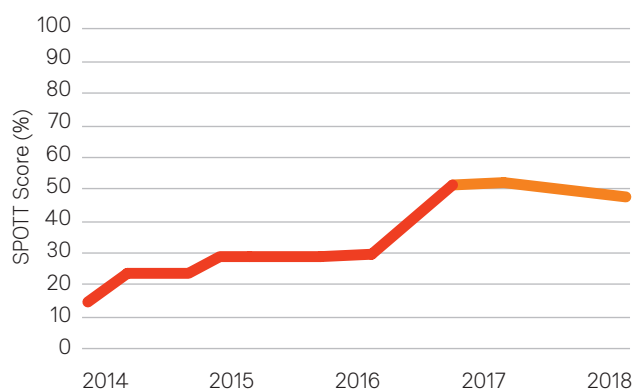
Environment	
Deforestation policy	
Deforestation policy/commitment implementation	
Biodiversity conservation policy	
Biodiversity policy/commitment implementation	
New peatlands	
Existing peatlands	
Soil management	
Burning	
Pest management	
Chemical management	
Waste management	
Water management	
GHG management	
Social	
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Child welfare	
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Health & safety	
Labour rights violations	
Social impact	
FPIC processes	
Land conflict	
Food security	
Fair pricing	
Training & support	
Participation	
Governance	
Sustainability policy & systems	
Memberships	
Certified supply	
Traceability	
Sustainability reporting	
Legal action/lawsuits	
Anti corruption policy & mechanisms	
Grievance mechanisms	

## Genting Plantations (GENP): 10 year assessment

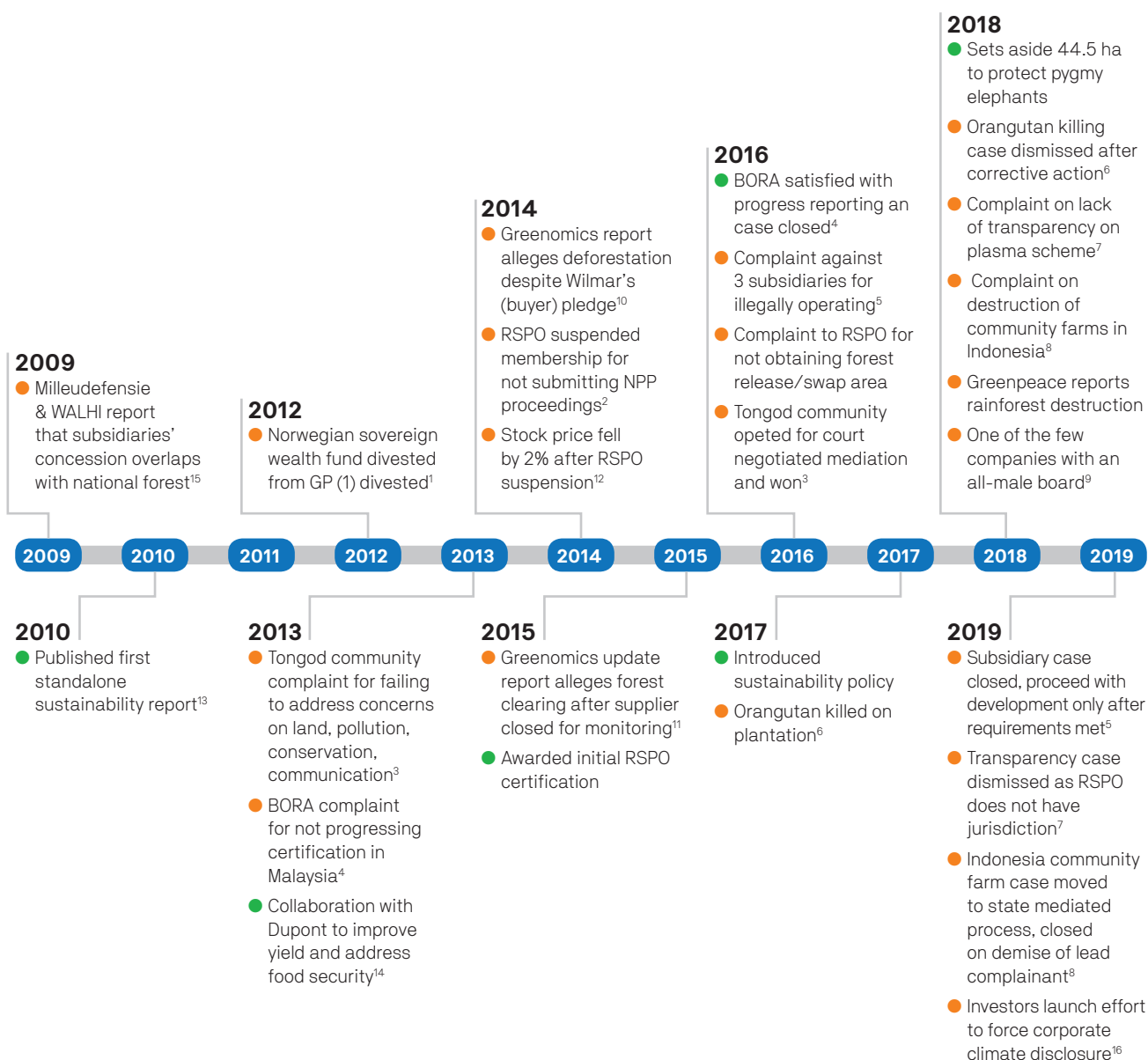
### PROGRESS

GENP is one of the low scorers on this assessment. While they have been publishing standalone sustainability reports over the last 10 years, there continue to be allegations of environmental violations against them. Some of these matter are still under RSPO review. As suppliers to other palm oil companies who conform to NDPE policies, there is pressure exerted from their supply chain as well as environmental groups. While they are formalizing more of their sustainability policies, they appear to have a long way to go.

### SPOTT assessment results over time



This graph has been compiled from data provided by SPOTT ([www.spott.org](http://www.spott.org)), as part of the Zoological Society of London (ZSL) ([www.zsl.org](http://www.zsl.org)). This data was obtained from the SPOTT website on 15<sup>th</sup> June 2019 and we acknowledge that SPOTT may have more up-to-date data available.



# Appendices

## Appendix 1

### RESEARCH METHOD

This section describes the research method and process including the Assessment Framework. The research methodology combined a desktop review and qualitative interviews to evaluate the sustainability performance of the companies.

### DESKTOP REVIEW

The selected companies were assessed and ranked against the framework, based on:

- public information made available by the companies, including websites, dashboards, annual reports and sustainability reports;
- media articles and reports by other NGOs and certification bodies to understand the current implementation status of company policies and to trace progress over the last 10 years;
- SPOTT assessments, initiated in 2014, to compare company progress and performance over time; and
- additional documents, that were not in the public domain, were provided by five companies to provide evidence for achieving levels of action in the framework.

### QUALITATIVE INTERVIEWS

Interviews were undertaken with experts and company representatives at three stages of the research:

- Experts at WWF and SPOTT provided feedback on the draft assessment framework;
- Three companies – Sime Darby Plantations (SDP), IOI and Wilmar – participated in an interview to provide feedback and additional evidence on their draft assessment (GENP and London Sumatra (Lonsum) provided written feedback); and
- Experts at WWF, SPOTT and RSPO provided feedback on the draft findings of the assessment, which was synthesised into this final report.
- Five companies – IOI, Wilmar, FGV, AAL and Lonsum provided feedback on the final report.

**1** ISF developed a framework for assessing the environmental, social and governance sustainability performance of palm oil producers, including a set of 11 criteria and 37 indicators across 5 levels of performance. The framework was based on a literature review of existing sustainability standards and charters. The framework was initially reviewed by sustainability experts at SPOTT. The complete Assessment Framework is provided in Appendix 3.

**2** From the assessment framework, ISF developed a series of questions to be answered from either publicly available data or information provided by companies via interview and/or written responses and documentation.

**3** Stewart Investors selected 10 companies to be included in the study. Two of the companies – London Sumatra (Lonsum) and Salim Ivomas – were subsidiaries of Indofood Agri, therefore only 9 companies were formally assessed.

**4** ISF undertook desktop research using public data and reports on the companies' current sustainability performance and progress over the last 10 years (2009 – 2019). The current performance was quantitatively scored through the framework, which allowed the companies to be ranked. The past performance was quantitatively mapped using historic SPOTT assessments and qualitatively analysed by constructing a timeline for each company using: media reports; other published information; and interview data from both industry experts and the companies themselves.

- 5** All companies were contacted and given the opportunity to be interviewed to provide additional evidence to support their sustainability assessment. SDP was the only company to respond to this initial interview request.
- 6** The draft assessments were reviewed by the research team, Stewart Investors and industry experts – SPOTT, WWF and RSPO. Due to confidentiality constraints, industry experts could not comment on the specific company rankings and scores but instead provided feedback on the application of the framework and directed the researchers to additional public resources to deliver a more comprehensive assessment. The feedback was incorporated to deliver a final draft of the company assessments
- 7** All companies were provided a second opportunity to review and comment on the final draft assessments, provide further information, respond to any follow up questions and correct any inaccuracies. Two companies – IOI and Wilmar – participated in an interview to provide feedback and additional evidence on their draft assessment. Three companies – SDP, GENP and Lonsum – provided written feedback on their draft assessments. Where appropriate, assessments and scores were adjusted to take into account any additional information.
- 8** ISF undertook a final team review, including an independent internal expert review of all assessments to ensure consistency across the different companies. Companies were provided a final opportunity to comment on the assessment. Five companies – IOI, Wilmar, FGV, AAL and Lonsum provided feedback on the final report. The final report was provided to Stewart Investors in October 2019.

## RESEARCH LIMITATIONS

Most companies started publishing standalone sustainability reports in 2016/2017. While there is some reporting on sustainability criteria in previous annual reports, it is hard to trace an evidence-based historic path.

The SPOTT assessments used to trace progress on sustainability only date back to 2014.

Media reports are comprehensively reported by SPOTT from 2014, but were more difficult to source prior to this year. Regional media becomes harder to trace as previous articles become available as websites change. Also issues of sustainability have become more prevalent in the media in recent years.

Not all companies responded to ISF's request for interviews and additional evidence. One company – KLK – actively chose not to participate. Those that did participate all scored higher than their original assessment. Therefore, the overall company rankings may not be fully reflective of the current state.

The companies that did respond provided additional evidence that is not publicly available, including specific implementation plans e.g. water management plans. It will be difficult to track progress against these plans in the future, since these metrics are also not published in sustainability reporting. Experts recommend that this level of detail be made publicly available to better demonstrate on-the-ground implementation.

## Appendices continued

### SUMMARY OF DATA USED TO ASSESS COMPANIES

Company	Company reports & website	SPOTT Assessment & media analysis	Interview	Written response to assessment
United Plantations Berhad	✓	✓	-	-
London Sumatra	✓	✓*	-	✓
FGV Holdings	✓	✓	-	✓
Genting Plantations	✓	✓	-	✓
IOI Corporation Berhad	✓	✓	✓	✓
Kuala Lumpur Kepong Berhad	✓	✓	-	-
Wilmar International Limited	✓	✓	✓	✓
Astra Agro Lestari	✓	✓	-	✓
Sime Darby Plantation	✓	✓	✓	✓

\*Lonsum was only assessed in SPOTT as a separate company till 2016. After 2016, the assessment is for the parent company Indofood Agri Resources.

## Appendix 2

### ASSESSMENT FRAMEWORK: PERFORMANCE SPECTRUM

Levels of performance	No Action	Compliance driven action	Incremental action	Strategic action	Integrated action	Systemic action
Score	0	1	2	3	4	5
<b>Description</b>	No action taken by company to improve sustainability performance	Action to improve sustainability performance based on local laws/regulations	Actions go beyond compliance into operational aspects of the company	Improved sustainability performance leveraged as competitive advantage	Sustainability performance aligned with core values of the company	Sustainability performance is excellent and championed by the company
<b>Nature</b>	BAU	Reactive	Opportunistic	Proactive	Embedded	Transformational
<b>Drivers</b>	None	Regulatory threat Public pressure/ good will	Eco- efficiencies/ Cost saving & revenue growth PR Crisis/ Reputation	Business Opportunities/ Profitability/Risk Management	Long term viability & value creation	Industry leadership Contribution to global sustainability goals
<b>Commitment</b>	None	Informal commitments	Targets & metrics adopted/ part of some certificatio/ reporting mechanism	Sustainability commitments embedded in corporate strategy	Sustainability commitments embedded in corporate strategy, governance and management structures	Commitments are BAU, embedded in all company processes, with regular feedback structures for continuous improvement
<b>Activities</b>	BAU	In compliance with local laws Ad hoc activities	Beyond solely compliance Targets & metrics adopted	Ambitious targets & metrics adopted Good progress achieved Innovation underway	Targets achieved Mostly undertaking industry best practice	Ambitious targets achieved Innovation for continuous improvement
<b>Challenges</b>	Lack of awareness/ intent No time/budget to focus on sustainability	Lack of awareness/ intent No time/budget to focus on sustainability	Knowledge gaps	Technology gaps Resourcing/ reporting constraints	Technology gaps	

Adapted from the Corporate Sustainability Continuum, Sustainability Integration Continuum and the Public Sector Leadership on Sustainable Development Spectrum .

## Appendices continued

### Appendix 3

#### ASSESSMENT FRAMEWORK: CRITERIA & INDICATORS

Criteria	Indicator	Description
<b>ENVIRONMENT</b>		
<b>Deforestation &amp; biodiversity</b>	Deforestation policy	Public commitment/policy on No Deforestation, No Peat, No Exploitation (NDPE) policies
	Deforestation policy implementation	Outstanding/long pending cases on deforestation against the company
	Biodiversity conservation policy	Public commitment/policy on biodiversity assessment & conservation
	Biodiversity policy implementation	Outstanding/long pending cases on biodiversity conservation against the company
<b>Plantation management</b>	New peatlands	No new planting takes place on peat regardless of the depth
	Existing peatlands	All existing peatlands are inventoried, documented and managed responsibly including exploring restoration opportunities
	Soil management	Good agricultural practices to manage/improve soil fertility
	Burning	No use of open burning/fire policy for all new or ongoing operations for land preparation, land management, or waste management
<b>Operations management</b>	Pest management	Systems in place to practice natural weed & pest control
	Chemical management	Pesticides and fertilisers used in ways that do not endanger health of workers, families, communities or the environment
	Waste management	Systems in place to manage waste in an environmentally and socially responsible manner
	Water management	Systems in place to manage the quality and quantity of water
<b>GHG emissions</b>	GHG management	Public reporting on annual GHG emission reduction plans, measures and targets



Criteria	Indicator	Description
<b>SOCIAL</b>		
<b>Decent work policies</b>	Terms of employment	Systems in place to provide all workers fair and decent terms of employment
	Facilities	Adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above
	No forced labour	Systems in place to ensure no forms of forced or trafficked labour are used
	Freedom of association	Systems in place to support workers' rights to collective bargaining and freedom of association
	Child welfare	Systems in place to safeguard and manage child welfare
	Gender equality	Non-discrimination and equal opportunity policy implemented to prevent discrimination based on gender
	Training & support	Programmes in place to support training needs of all staff and workers
	Health & safety	Systems in place to safeguard worker health & safety
	Labour rights violations	Outstanding/long pending cases on labour violations against the company
<b>Community &amp; Land rights</b>	Social impact	Systems in place to assess, manage and monitor social impact of operations on communities
	FPIC processes	Systems in place to obtain comprehensive FPIC with full respect for legal and customary rights
	Land conflict	Outstanding/long pending land disputes against the company
	Food security	Food security concerns of workers, smallholders, and indigenous & local communities affected by existing plantations
<b>Smallholders</b>	Fair pricing	Systems in place to conduct fair and transparent dealings with all smallholders (Independent and Scheme)
	Training & support	Training & support to improve livelihoods of smallholders and their inclusion in sustainable value chains is provided
	Participation	Number of smallholders certified by RSPO

## Appendices continued

Criteria	Indicator	Description
<b>GOVERNANCE</b>		
<b>Leadership</b>	Sustainability policy & systems	Published sustainability commitments and targets, and allocation of resources and responsibility across the organisation
	Memberships	Company is a member of RSPO, POIG and other national schemes
<b>Responsible sourcing</b>	Certified supply	Company output is certified by RSPO or other national schemes
	Traceability	Supply chain is traceable and verifiable e.g, by RSPO SCCS
<b>Reporting &amp; transparency</b>	Sustainability reporting	Published sustainability reports and landbank maps
	Legal action/ lawsuits	Outstanding legal cases against the company
	Anti-corruption policy & mechanisms	Systems in place to monitor compliance and policy implementation, and overall ethical business practice
<b>Conflict resolution &amp; grievance</b>	Grievance mechanisms	Openness and accessibility of grievance mechanisms to stakeholders, with an option for anonymity.

# References

- i WWF, 2018. <https://www.wwf.org.au/what-we-do/food/palm-oil#gs.ro7kfx>
- ii GreenPalm, 2016. <https://greenpalm.org/about-palm-oil/what-is-palm-oil>
- iii WWF, 2018. <https://www.wwf.org.au/what-we-do/food/palm-oil#gs.ro7kfx>
- iv Willard, 2005. "Next Sustainability Wave: Building Boardroom Buy-In". Gabriola Island, BC, Canada: New Society Publishers. [https://books.google.com.au/books?hl=en&lr=&id=CN\\_OAgAAQBAJ&oi=fnd&p-g=PR15&dq=%E2%80%A2Corporate+sustainability+continuum++\(Willard,+2005\)&ots=5R06Gk1V-Ja&sig=hr1noGze9cPPSRUtUkOFdwQzQT0#v=snip-pet&q=continuum&f=false](https://books.google.com.au/books?hl=en&lr=&id=CN_OAgAAQBAJ&oi=fnd&p-g=PR15&dq=%E2%80%A2Corporate+sustainability+continuum++(Willard,+2005)&ots=5R06Gk1V-Ja&sig=hr1noGze9cPPSRUtUkOFdwQzQT0#v=snip-pet&q=continuum&f=false)
- v Strandberg Consulting, 2015. Sustainability Integration Continuum <https://corostrandberg.com/wp-content/uploads/2015/07/sustainability-integration-continuum-2015.pdf>
- vi Forum for the Future, 2010. Public sector leadership on sustainable development spectrum <https://www.criticalcayle.com/inspiring/insights-servfile.cfm?id=2136>

## United Plantations Berhad

1. <http://www.greenpeace.org/archive-belgium/Global/belgium/report/2008/11/rspo-scandal.pdf> ; <http://unitedplantations.com/Files/PDF/Announcements/Unjust%20allegations%20by%20Greenpeace%20on%20United%20Plantations%20Bhd%20and%20the%20RSP0%20Page%201.pdf>
2. <https://askrspo.force.com/Complaint/s/case/50090000029w2ZvAAI/detail>
3. <http://www.unitedplantations.com/Files/PDF/Best%20managed%20estate%20160809.pdf>
4. [http://www.unitedplantations.com/Public/Media\\_room.asp](http://www.unitedplantations.com/Public/Media_room.asp)
5. <http://www.unitedplantations.com/news/rebuttal.asp>
6. <https://scandasia.com/copenhagen-zoo-and-malaysia-strengthens-collaboration-further/>
7. <http://www.unitedplantations.com/Public/doc/ACCA%20MaSRA.pdf> ; <http://www.theedgemarkets.com/article/sime-darby-wins-best-overall-sustainability-reporting-award>
8. <http://www.unitedplantations.com/Public/doc/SBB%20Award%20%20%20Special%20Recognition%20Award.pdf>
9. <http://www.unitedplantations.com/Files/PDF/Announcements/UPAR2018.pdf>
10. <https://redd-monitor.org/2013/03/13/norways-sovereign-wealth-fund-divests-from-23-palm-oil-companies/>

## Other documents referenced

- Sustainability Report 2018
- Annual Report 2018
- Conservation Management Report 2016
- Environment & Biodiversity Policy 2017
- SOPs for New Planting Procedures 2016
- Human Rights Policy 2017
- Guest Workers Policy 2017
- Gender Policy 2015
- Occupational Safety and Health (OSH) policy 2017
- Code of Conduct & Business Rthics 2016
- Whistleblowing Policy 2017
- United Plantation website

## IOI Corporation Berhad (IOI)

1. <https://askrspo.force.com/Complaint/s/case/50090000028ErzqAAC/detail>
2. <https://askrspo.force.com/Complaint/s/case/50090000028Erz8AAC/detail>
3. [https://issuu.com/greenpeaceinternational/docs/deadly-trade-off-ioi-report\\_highres](https://issuu.com/greenpeaceinternational/docs/deadly-trade-off-ioi-report_highres)
4. <https://www.greenpeace.org/archive-international/Global/international/publications/forests/2017/Still-Cooking-the-Climate.pdf>
5. [https://www.foeeurope.org/sites/default/files/publications/foee\\_too\\_green\\_to\\_be\\_true\\_0310.pdf](https://www.foeeurope.org/sites/default/files/publications/foee_too_green_to_be_true_0310.pdf)
6. <https://aliran.com/civil-society-voices/2017-civil-society-voices/major-malaysian-palm-oil-company-announces-groundbreaking-labour-policies/>
7. <http://www.triplepundit.com/story/2016/cargill-suspends-palm-oil-contracts-controversial-producer/24206>
8. <https://finnwatch.org/fi/uutiset/555-nesteen-alihankkijan-tyoelot-kehittyneet-myoes-malesian-sab-ahissa?highlight=WyJpb2kiXQ==>
9. <https://www.finnwatch.org/en/news/213-ioi-group-suspected-of-serious-labour-rights-violations> ; <https://www.finnwatch.org/images/palmoil.pdf>

## References continued

10. [https://www.finnwatch.org/images/pdf/IOI-2016\\_EN.pdf](https://www.finnwatch.org/images/pdf/IOI-2016_EN.pdf)
11. <https://www.malaysiakini.com/letters/165286>
12. [https://1bps6437gg8c169i0y1drtgz-wpengine.netdna-ssl.com/wp-content/uploads/2017/legacy/FOE\\_CommodityCrimes\\_LowRes.pdf](https://1bps6437gg8c169i0y1drtgz-wpengine.netdna-ssl.com/wp-content/uploads/2017/legacy/FOE_CommodityCrimes_LowRes.pdf)
13. <https://zembla.bnnvara.nl/pdf/LettertoRSPOonIOIcomplaint19April2012.pdf>
14. <https://redd-monitor.org/2013/03/13/norways-sovereign-wealth-fund-divests-from-23-palm-oil-companies/>
15. [http://www.aidenvironment.org/media/uploads/documents/A1757\\_Biomassa\\_Failing-governance-avoiding-responsibilities\\_september2009-2.pdf](http://www.aidenvironment.org/media/uploads/documents/A1757_Biomassa_Failing-governance-avoiding-responsibilities_september2009-2.pdf)
16. <https://chainreactionresearch.com/the-chain-continued-uptake-of-ndpe-policies-a-key-factor-in-reducing-deforestation-rates-in-se-asia/>

### Other documents referenced

- Sustainability report 2019
- Sustainability report 2018
- Sustainability report 2017
- Sustainability Progress updates 2017-2019
- Palm Oil Dashboard
- Sustainable Palm Oil Policy 2018
- Peatland Protection & Management Policy 2018
- Zero Burning Policy 2018
- Agrochemical Management Policy 2018
- Minimum Wage & Leave Pay policies in Malaysia 2017
- Foreign Workers Recruitment Guideline & Procedures in Malaysia 2017
- Equal Opportunity Employment & Freedom of Association Policy 2017
- Policy on Harassment at Workplace
- Business Ethics, Compliance, Anti-Corruption, Anti-Money Laundering Policy
- Code of Business Conduct and Ethics
- Code of Ethics for Directors
- Company interview & correspondence
- IOI website

### Sime Darby Plantation (SDP)

1. <https://askrspo.force.com/Complaint/s/case/50090000028Es0xAAC/detail>
2. <https://askrspo.force.com/Complaint/s/case/50090000028Es02AAC/detail>
3. <https://askrspo.force.com/Complaint/s/>

sime-darby-unveils-industry-first-platform-for-palm-oil-transparency/

10. <https://www.theborneopost.com/2019/05/16/sime-darby-plant-ranks-first-in-asean-business-and-human-rights-disclosure-study/>
11. <https://chainreactionresearch.com/the-chain-continued-uptake-of-ndpe-policies-a-key-factor-in-reducing-deforestation-rates-in-se-asia/>
12. <https://frontpageafricaonline.com/news/liberia-house-finds-sime-darby-plantation-liable-for-breaching-concession-agreement/>
13. <https://www.theedgemarkets.com/article/sime-darby-wins-best-overall-sustainability-reporting-award>
14. <http://gnnliberia.com/2016/09/21/sime-darby-plantation-launches-responsible-agriculture-charter/>
15. <https://chainreactionresearch.com/report/sime-darby-liberian-crossroads/>

### Other documents referenced

- Annual Report 2018
  - Supplementary Progress Report on Sustainability 2018
  - NBPOL Sustainability Report 2016/17
  - Responsible Agriculture Charter
  - Environment & Biodiversity Policy
  - Environmental Management Policy
  - Saving The Orang Utan Policy
  - Slope & River Protection Policy
  - Carbon Policy
  - Social Policy
  - Social & Humanity Management Policy
  - Child Protection Policy
  - Gender Policy
  - Occupational, Safety & Health Policy
  - Corporate Policy Statement
- Sime Darby Plantations website

### Wilmar International Limited (Wilmar)

1. <https://redd-monitor.org/2013/03/13/norways-sovereign-wealth-fund-divests-from-23-palm-oil-companies/>
2. <https://askrspo.force.com/Complaint/s/case/50090000028ErzyAAC/detail>
3. <https://askrspo.force.com/Complaint/s/case/50090000028ErzRAAS/detail>
4. <https://askrspo.force.com/Complaint/s/case/50090000028Es0LAAS/detail>
5. <https://askrspo.force.com/Complaint/s/case/50090000028Es0LAAS/detail>

6. <https://askrspo.force.com/Complaint/s/case/50090000028Erz4AAC/detail>
7. <https://askrspo.force.com/Complaint/s/case/50090000028Es0VAAS/detail>
8. <https://askrspo.force.com/Complaint/s/case/50090000029w2raAAA/detail>
9. <https://askrspo.force.com/Complaint/s/case/50090000028Es0SAAS/detail>
10. [https://d3n8a8pro7vhmx.cloudfront.net/rainforestactionnetwork/pages/17068/attachments/original/1478544586/2\\_RAN\\_Protecting\\_The\\_Leuser\\_2016\\_\(2\).pdf?1478544586](https://d3n8a8pro7vhmx.cloudfront.net/rainforestactionnetwork/pages/17068/attachments/original/1478544586/2_RAN_Protecting_The_Leuser_2016_(2).pdf?1478544586)
11. [https://www.wilmar-international.com/sustainability/wp-content/uploads/2018/06/18614\\_Grievance-update.pdf](https://www.wilmar-international.com/sustainability/wp-content/uploads/2018/06/18614_Grievance-update.pdf)
12. [https://d3n8a8pro7vhmx.cloudfront.net/rainforestactionnetwork/pages/2729/attachments/original/1415727943/Last\\_Place\\_On\\_Earth\\_Report\\_Nov2014.pdf?1415727943](https://d3n8a8pro7vhmx.cloudfront.net/rainforestactionnetwork/pages/2729/attachments/original/1415727943/Last_Place_On_Earth_Report_Nov2014.pdf?1415727943)
13. [http://www.greenomics.org/docs/Findings\\_Wilmar's-No-Deforestation-Policy\\_\(LowRes\).pdf](http://www.greenomics.org/docs/Findings_Wilmar's-No-Deforestation-Policy_(LowRes).pdf)
14. <https://foe.org/2015-02-foe-uganda-files-a-lawsuit-over-palm-oil-landgrab/>
15. <http://www.greenpeace.nl/Global/nederland/report/2016/bossen/Deadly-Trade-off-IOI-Report.pdf>  
<http://www.mightyearth.org/BurningParadise/>
16. <https://www.eco-business.com/news/indonesian-palm-oil-pledge-disbands/>
17. <https://www.greenpeace.org/archive-seasia/Global/international/publications/forests/2017/Still-Cooking-the-Climate.pdf>
18. <https://www.businesstimes.com.sg/companies-markets/wilmar-tops-singapore-companies-for-human-rights-disclosure-second-in-asean-study>
19. [https://storage.googleapis.com/planet4-international-stateless/2019/09/98db6c73-gp\\_cte\\_report\\_lowres.pdf](https://storage.googleapis.com/planet4-international-stateless/2019/09/98db6c73-gp_cte_report_lowres.pdf)
20. <https://www.wilmar-international.com/sustainability/grievance-procedure/>

#### Other documents referenced

- Sustainability Report 2018
- NDPE Policy 2013
- Environmental Policy 2015
- Human Rights Policy 2018
- Human Rights Framework
- UK Modern Slavery Act Transparency Statement Wilmar International

- Child Protection Policy 2018
- Equal Opportunity Policy 2018
- Health & Safety Policy 2019
- Sustainability and Traceability Policy for Palm Oil Production 2019
- Whistleblowing Policy 2016
- Wilmar website

#### Kuala Lumpur Kepong Berhad (KLK)

1. <https://redd-monitor.org/2013/03/13/norways-sovereign-wealth-fund-divests-from-23-palm-oil-companies/>
2. [https://www.ran.org/wp-content/uploads/2018/06/klk\\_case\\_study\\_2014\\_low.pdf](https://www.ran.org/wp-content/uploads/2018/06/klk_case_study_2014_low.pdf)
3. <https://askrspo.force.com/Complaint/s/case/50090000028Es00AAS/detail>
4. <https://askrspo.force.com/Complaint/s/case/50090000028ErzvAAC/detail>
5. <https://www.ran.org/press-releases/contested-klk-palm-oil-leases-declared-illegal-papua-new-guinea-court/>
6. [https://www.ran.org/press-releases/palm\\_oil\\_giant\\_kuala\\_lumpur\\_kepong\\_berhad\\_klk\\_plagued\\_by\\_ongoing\\_conflict\\_and\\_exploitation\\_new\\_progress\\_report\\_finds/](https://www.ran.org/press-releases/palm_oil_giant_kuala_lumpur_kepong_berhad_klk_plagued_by_ongoing_conflict_and_exploitation_new_progress_report_finds/)
7. <https://www.schusterinstituteinvestigations.org/slavery-palm-oil-plantations-indonesia>
8. <https://frontpageafricaonline.com/county-news/liberia-river-cess-community-rejecting-oil-palm-plantation/>
9. <https://www.greenpeace.org/archive-international/Global/international/publications/forests/2017/Still-Cooking-the-Climate.pdf>
10. <https://www.valuewalk.com/2016/11/klk-withdraws/>

#### Other documents referenced

- Sustainability Report 2018
- Sustainability Report 2017
- Sustainability Policy 2018
- Environmental Policy
- Group Employee Grievance Redressal Policy
- Group Whistleblowing Policy 2017/19
- KLK website

#### London Sumatra (Lonsum)

1. <https://redd-monitor.org/2013/03/13/norways-sovereign-wealth-fund-divests-from-23-palm-oil-companies/>
2. <https://askrspo.force.com/Complaint/s/case/50090000028Es03AAC/detail>
3. <https://askrspo.force.com/Complaint/s/case/50090000028ErzBAAS/detail>

## References continued

4. [https://www.ran.org/wp-content/uploads/rainforestactionnetwork/pages/15889/attachments/original/1467043668/The\\_Human\\_Cost\\_of\\_Conflict\\_Palm\\_Oil\\_RAN.pdf?1467043668](https://www.ran.org/wp-content/uploads/rainforestactionnetwork/pages/15889/attachments/original/1467043668/The_Human_Cost_of_Conflict_Palm_Oil_RAN.pdf?1467043668)
5. <https://askrspo.force.com/Complaint/s/case/50090000028ErzkAAC/detail>
6. <https://www.greenpeace.org/international/publication/18455/the-final-countdown-forests-indonesia-palm-oil/>
7. [https://d3n8a8pro7vhmx.cloudfront.net/rainforestactionnetwork/pages/14786/attachments/original/1442856231/Full\\_Report\\_Palm\\_Oil\\_Sustainability\\_Assessment\\_of\\_Indofood\\_Agri\\_Resources.pdf?1442856231](https://d3n8a8pro7vhmx.cloudfront.net/rainforestactionnetwork/pages/14786/attachments/original/1442856231/Full_Report_Palm_Oil_Sustainability_Assessment_of_Indofood_Agri_Resources.pdf?1442856231)
8. <https://www.bakeryandsnacks.com/Article/2018/10/05/PepsiCo-and-Nestle-sever-ties-with-Indonesia-s-largest-palm-oil-supplier-in-wake-of-alleged-human-rights-abuses>
9. <https://www.regnskog.no/en/news/worlds-largest-sovereign-wealth-fund-continues-to-drop-companies-over-deforestation>
10. [https://www.banktrack.org/download/maybank\\_the\\_single\\_largest\\_palm\\_oil\\_financier/maybankreportenglish210218.pdf](https://www.banktrack.org/download/maybank_the_single_largest_palm_oil_financier/maybankreportenglish210218.pdf)
11. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
12. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
13. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
14. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
15. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
16. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
17. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
18. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
19. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
20. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
21. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
22. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
23. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
24. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
25. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
26. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
27. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
28. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
29. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
30. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
31. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
32. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
33. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
34. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
35. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
36. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
37. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
38. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
39. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
40. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
41. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
42. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
43. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
44. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
45. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
46. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
47. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
48. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
49. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
50. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
51. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
52. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
53. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
54. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
55. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
56. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
57. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
58. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
59. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
60. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
61. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
62. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
63. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
64. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
65. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
66. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
67. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
68. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
69. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
70. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
71. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
72. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
73. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
74. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
75. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
76. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
77. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
78. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
79. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
80. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
81. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
82. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
83. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
84. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
85. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
86. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
87. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
88. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
89. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
90. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
91. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
92. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
93. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
94. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
95. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
96. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
97. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
98. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
99. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
100. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)

### Other documents referenced

- Lonsum Sustainability Report 2018
- Indoagri Sustainability Report 2018
- Lonsum Annual Report 2018
- Indoagri Sustainable Palm Oil Policy 2017
- Indoagri Code of Conduct
- Lonsum website
- Indofood Agri website

### Felda Global Ventures Holdings (FGV)

1. <https://askrspo.force.com/Complaint/s/case/50090000028Es0aAAC/detail> ; <https://www.reuters.com/article/us-malaysia-palmoil-fgvholdings/palm-oil-body-says-it-finds-exploitative-labor-practices-at-malysias-fgv-idUSKCN1NZ18J>
2. <https://askrspo.force.com/Complaint/s/case/50090000028ErzMAAS/detail>
3. <https://askrspo.force.com/Complaint/s/case/50090000028Es14AAC/detail>
4. <https://www.wsj.com/articles/palm-oil-migrant-workers-tell-of-abuses-on-malaysian-plantations-1437933321>
5. <https://chainreactionresearch.com/the-chain-felda-global-ventures-asian-plantations-deforestation-contrary-to-company-wide-policy-group-takes-corrective-action/>
6. [http://forestsandfinance.org/wp-content/uploads/2017/04/RAN\\_Every-Investor-Has-a-Responsibility\\_2017.pdf](http://forestsandfinance.org/wp-content/uploads/2017/04/RAN_Every-Investor-Has-a-Responsibility_2017.pdf)
7. <https://www.theedgemarkets.com/article/settlers-bearing-brunt-cashflow-issues-felda>
8. <https://www.thestar.com.my/business/business-news/2019/06/29/unmasking-the-fgv-remuneration-saga/>
9. <https://www.valuewalk.com/2017/01/chain-felda/>
10. <https://www.theedgemarkets.com/article/felda-global%E2%80%99s-subsidiary-gets-malaysian-palm-oil-industry-award>
11. Khor, Y., "FELDA Settlers & The Felda Global IPO – a socio-political perspective", Khor Reports, 22 May 2012.
- 25 Razak, A. "FGV listing: Status of Malay reserve land questioned", Malaysiakini, 6 June 2012 ( <http://www.malaysiakini.com/news/200055>), viewed June 2012.
12. <https://www.theedgemarkets.com/article/fgv-cleared-alleged-fraud-manipulation-oer>
13. [http://www.fgvholdings.com/wp-content/uploads/2018/06/FGV-Sustainability-Report-2016\\_2017.pdf](http://www.fgvholdings.com/wp-content/uploads/2018/06/FGV-Sustainability-Report-2016_2017.pdf)
14. <https://chainreactionresearch.com/the-chain-financial-troubles-at-felda-may-impede-fgvs-sustainability-efforts/>
15. [https://www.bothends.org/uploaded\\_files/inlineitem/2Felda\\_Global\\_Ventures\\_Profundo\\_120613.pdf](https://www.bothends.org/uploaded_files/inlineitem/2Felda_Global_Ventures_Profundo_120613.pdf)
16. <http://www.fgvholdings.com/media-release-fgv-champions-conservation-of-the-worlds-largest-flower-rafflesia-and-worlds-smallest-bears-species-the-sun-bear-with-frim-and-perhilitan/>
17. <https://www.reuters.com/article/us-fgv-management/malaysian-corruption-investigators-search-felda-globals-head-office-idUSKBN18Z0FA>
18. <http://www.fgvholdings.com/wp-content/uploads/2018/01/FGV-RSPO-Certification-Initiative-and-FGV-Kalimantan-Peat-Restoration-Master-Plan-12-January-2018.pdf>
19. <https://www.rnz.co.nz/news/regional/289457/nz-linked-to-destruction-in-se-asia,-greenpeace-says>

20. <http://www.fgvholdings.com/lifting-of-certification-suspension-for-fgvs-serting-complex/>
21. <http://www.fgvholdings.com/fgv-palm-industries-sime-darby-energy-solutions-and-biotek-dinamik-enter-tripartite-mou-on-biocng/>

#### Other documents referenced

- Annual Report 2018
- Sustainability Report 2016-17
- Group Sustainability Policy 2019
- Grievance Policy
- Supplier Code of Conduct (SCOC)
- Code of Ethics & Conduct
- Code of Business Practice
- FGV Whistleblowing Policy
- FGV website

#### Astra Agro Lestari (AAL)

3. [http://www.aidenvironment.org/media/uploads/documents/Astra\\_Agro\\_Lestari\\_report\\_ENG\\_Final-2.pdf](http://www.aidenvironment.org/media/uploads/documents/Astra_Agro_Lestari_report_ENG_Final-2.pdf)
4. <http://www.mightyearth.org/indonesias-second-largest-palm-oil-producer-fails-to-deliver-on-its-sustainability-policy/>
5. <https://news.mongabay.com/2018/06/when-palm-oil-meets-politics-indonesian-farmers-pay-the-price/>
6. <https://redd-monitor.org/2013/03/13/norways-sovereign-wealth-fund-divests-from-23-palm-oil-companies/>
7. <http://www.forestheroes.org/mandarin-oriental-were-not-fans-of-your-rainforest-destruction/> ; <https://d3n8a8pro7vhmx.cloudfront.net/forestheroes/pages/131/attachments/original/1412255345/9546Koptimized.pdf?1412255345>
8. <http://www.forestheroes.org/astra-agro-lestari-joins-ipop/>
9. <https://d5i6is0eze552.cloudfront.net/documents/Publikasjoner/Andre-rapporter/Update-on-Astra-Agro-Lestaris-sustainability-policy-implementation-ID-31605.pdf?mtime=20160927135648>

#### Other documents referenced

- Sustainability Report 2018
- Sustainability Report 2016
- Progress report on Sustainability - Q1 2019
- Annual Report 2018
- Sustainability Policy
- AAL website

#### Genting Plantations (GENP)

1. <https://redd-monitor.org/2013/03/13/norways-sovereign-wealth-fund-divests-from-23-palm-oil-companies/>
2. <https://www.theedgemarkets.com/article/genting-plantations%E2%80%99-rspo-membership-suspended>
3. <https://askrspo.force.com/Complaint/s/case/50090000028Es0FAAS/detail>
4. <https://askrspo.force.com/Complaint/s/case/50090000028ErzYAAS/detail>
5. <https://askrspo.force.com/Complaint/s/case/50090000028Es0ZAAS/detail>
6. <https://askrspo.force.com/Complaint/s/case/50090000028Es0zAAC/detail>
7. <https://askrspo.force.com/Complaint/s/case/50090000028EoXjAAK/detail>
8. <https://askrspo.force.com/Complaint/s/case/50090000028CD8InAAD/detail>
9. <https://www.malaymail.com/news/malaysia/2018/01/21/all-male-board-only-in-seven-top-firms-sc-says-as-women-power-up-in-2018/1558955>
10. [http://www.greenomics.org/docs/Wilmar's-suppliers-deforestation\\_\(LowRes\).pdf](http://www.greenomics.org/docs/Wilmar's-suppliers-deforestation_(LowRes).pdf)
11. [http://www.greenomics.org/docs/IPOP\\_Implementation\\_Report-09\\_Greenomics.pdf](http://www.greenomics.org/docs/IPOP_Implementation_Report-09_Greenomics.pdf)
12. <https://news.mongabay.com/2014/05/malaysian-palm-oil-company-stock-drops-after-environmental-complaint/>
13. <http://www.gentingplantations.com/wp-content/uploads/2017/04/2010.pdf>
14. [http://www.acgt.com/press/pdf/DuPont\\_Genting\\_Plantations\\_Joint\\_Press\\_Release\\_3\\_Dec\\_2012.pdf](http://www.acgt.com/press/pdf/DuPont_Genting_Plantations_Joint_Press_Release_3_Dec_2012.pdf)
15. [http://www.aidenvironment.org/media/uploads/documents/A1757\\_Biomassa\\_Failing-governance-avoiding-responsibilities\\_september2009-2.pdf](http://www.aidenvironment.org/media/uploads/documents/A1757_Biomassa_Failing-governance-avoiding-responsibilities_september2009-2.pdf)
16. <https://www.businessgreen.com/bg/news-analysis/3077444/investors-launch-co-ordinated-effort-to-force-corporate-climate-disclosure>

#### Other documents referenced

- London Sustainability Report 2018
- Sustainability Report 2017
- Annual Report 2018
- Code of Conduct and Ethics
- Whistleblower Policy
- Genting Plantations website



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