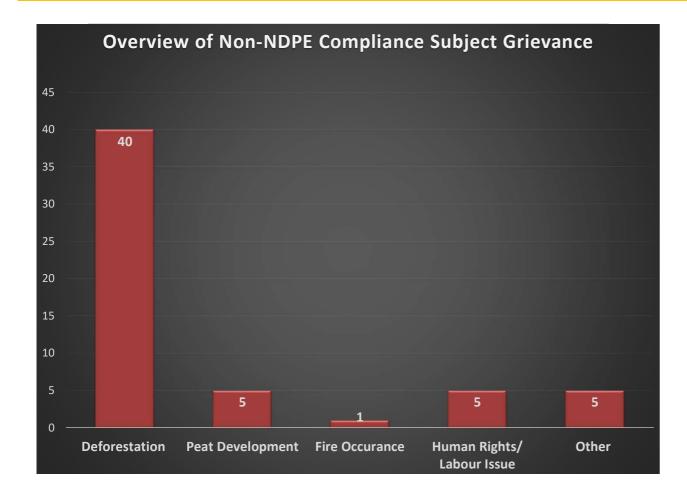
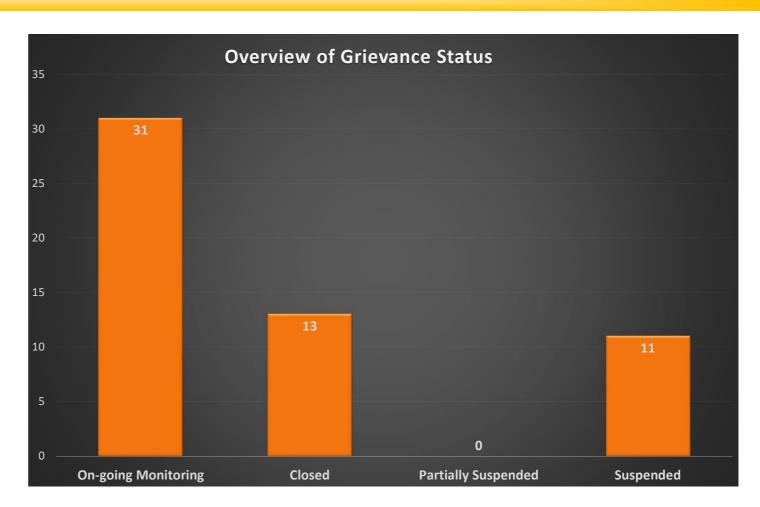
## Mewah Group Sustainability Grievance Log (Update as at Jun 2022)





Target of Grievance/	Potential link	in supply chain	Data La	Source of Col	Cubicat Crime		Charles
No. Company	Direct	Indirect	Date Logged	Source of Grievance	Subject Grievance	To-date action taken by Mewah	Status
1 PT Teguhkarsa Wanalestari	Y	N	09-Jun-22	Mighty Earth #39	Approximate 340ha (indicative HCS) was cleared in PT Sawit Sukses Sejati (affiliate relationship to PT Teguhkarsa Wanalestari).	<ol> <li>Investigation is currently on-going:         <ul> <li>a.) To verify group-level ownership of PT Sawit Sukses Sejati</li> <li>b.) To verify the "affliate releationship" between PT Sawit Sukses Sejati and PT Teguhkarsa Wanalestari.</li> <li>c.) To seek PT Teguhkarsa Wanalestari to issue immeadiate stop-work-order on the clearance location: 1.037677, 99.036329, at Mandailing Natal Regency, North Sumatra.</li> </ul> </li> </ol>	On-going verification/ monitoring
2 Jernih Kemboja POM	Ν	У	16-Feb-22	Mighty Earth #38	A total of 25ha in Plot 1815 and Plot 1814 (2090 ha) deforestation by AA Sawit as operator in the degazetted HSK Jemaluang, in the district of Mersing.	<ol> <li>Mr Chow Chuin Hai owns 49% of AA Sawit, and 100% of Jernih Kemboja Palm Oil Mill. AA Sawit is the operator to deforest and develop the land in PTD 1814 and PTD 1815.</li> <li>Mewahoelo Industried Sdn Bhd (a subsidiary of Mewah) sourced CPO INDIRECTLY, through string contract from third-party supplier in year 2021.</li> <li>On 17 Feb-22 - Mewah initiated engagement with AA Sawit and Jernih Kemboja POM pertaining the allegations.</li> <li>On 10 Jun-22 - Jernih Kemboja responded to Mewah on its progress:         <ul> <li>a.) Implementation &amp; enforcement of Jernih Kemboja's Group Sustainability Policy</li> <li>b.) A management commitment letter that addressed (i.) implementation of stop-work-order; (ii.) Seek reveiw from independent third-parties on all new development areas to asertain potential liability; (iii.)</li> </ul> </li> <li>Commitment to support on suitable recovery project guided by recommendation from independent third-parties.</li> <li>c.) Implementation &amp; enforcement of Mados's Sustainability Policy</li> <li>6. To-date, a trade suspension is still imposing on Jernih Kemboja Palm Oil Mill to facilitate investigation and support in meeting Mewah's supply chain re-entry criteria.</li> </ol>	On-going verification/ monitoring/Suspended
3 Sg Terah Palm Oil Mill	Ν	Y	21-Dec-21	Starling & Satelligence's Supply Chain Report	A total of 97.2ha of deforestation occurred on the western border of the Lebir Estate concession.	<ol> <li>Sg. Terah Palm Oil Mill is a private entity register under Agropalm Sdn Bhd.</li> <li>Mewah-Oils Sdn Bhd sourced CKPO indirectly from Kilang Sawit Sungai Terah Jan-Jun'21 through SHH Oil Mill Sdn Bhd. We also sourced CPO directly in 2020 from Kilang Sawit Sungai Terah.</li> <li>Based on the engagement with Estate Manager of JFL Holdings (Parent company of Lebir estate):         <ul> <li>(A). The deforestation detected is not within the concession areas of Lebir estate and they have no plan to further expand their current operation.</li> <li>(B). The Lebir Estate is a MSPO certified estate since the year of 2019, where their planting was completed in the year of 2015.</li> <li>(C). Since March 2019, a total of 93ha of logging licensed under Komplek Perkayuan Kelantan Sdn Bhd was permitted. Kompleks Perkayuan Kelantan Sdn Bhd is a subsidiary company registered under state owned Kelantan State Economic Development Corporation.</li> </ul> </li> <li>Based on our investigation, the deforestation occurred is for logging purpose and it falls beyond the scope of our present Sustainable Palm Oil policy/grievance mechanism.</li> </ol>	Closed
4 Syarikat Cahaya Muda Perak Sdn Bhd	Y	N	16-Dec-21	Earthqualizer	4ha of deforestation between 16 to 31 May 2021, and 6ha of deforestaion between Jan to 30 Sep 2021		Closed
5 Sabah Land Development Board	Y	N	20-Sep-21	Earthqualizer	Deforestation in Kawayoi Plantation: 3ha between 1st - 31st Aug'21 & Improper reimbursement to communities	<ol> <li>Since Dec'20 to Aug'21, Mewah sourced CPO directly from Pandewan Palm Oil Mill for our refinery, Mewah Datu Sdn Bhd.</li> <li>The engagement between Mewah and the Pandewan Palm Oil initiated on 21-Sept. The responses as below:         <ul> <li>(A.) 3 ha deforestation in Kawayoi Plantation in Augsut 2021             <ul></ul></li></ul></li></ol>	On-going Monitoring
	Y	N	21-Jul-21	Global Witness	Deforestation & Environmental Harms, Deforestation, Police violence, Worker health & Safety at PNG	<ol> <li>In year 2020, Mewah imported CPKO from Gilford Limited, which is a subsidary under Rimbunan Hijau (RH).</li> <li>The engagement between Mewah and RH was initiated in late July-21. RH has been very cooperative and transparent during the engagement.</li> <li>Notwithstanding the above, all trading activities with RH has been suspended until and unless the Company is able to provide tangible evidence to support their claims.</li> </ol>	Suspended
6 Rimbunan Hijau	N	Y	01-Jul-21	Mighty Earth (RRR# 34)	614 ha Clearance prep/Stacking lines at LPF 0026 (Sarawak) in the period of Jun 20 - Apr 21	<ol> <li>In year 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO).</li> <li>Reference to Wilmar's sustainability dashboard, Rimbunan Hijau, entered Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils.</li> <li>The engagement between Mewah and RH was initiated in early July-21.</li> <li>On 12 Aug 21, RH responded that the area demarcated by NGO is not planted with oil palm instead the area has been earmarked by State Forestry for forest replanting.</li> <li>The alleged area was approved by State Forestry for salvage logging and there after has been replanted with bamboo and <i>Eucalyptus pellita</i> in compliance with directive from State Forestry.</li> </ol>	Closed

7 East New Britain Resources Group	Y	N	21-Jul-21	Global Witness	Deforestation, Corruption, Lack of free, prior, informed and consent (FPIC), Child Labor, Tax 2.) The en Evasion at PNG	ear 2020, Mewah imported CPKO from Tzen Plantation Limited, which is a subsidary under East New Britain (ENB). engagement between Mewah and ENB was initiated in late July-21. ENB has been very cooperative and transparent during the engagement. withstanding the above, all trading activities with ENB has been suspended until and unless the Company is able to provide tangible evidence to support their claims.	Suspended
8 WTK Holdings	Ν	Y	06-Jul-21	Earthqualizer's Supply Chain Report	12ha deforestation at Medan Mestika Sdn Bhd 2.) Refer in the period of Jan-Apr'21.	ear 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO). erence to Wilmar's sustainability dashboard, WTK Palm Oll Mill entered Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils. ed on our investigation outcome, Medan Mestika Sdn Bhd is not legal owned by and related to WTK.	Closed
9 Pure Green Development 9 Sdn Bhd	N	Y	14-Jul-21	Earthqualizer's Supply Chain Report	58ha deforestation at Marang, Terengganu in the period of Jan-May'21 3.) Based	ear 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO). erence to Wilmar's sustainability dashboard, Tetangga Akrab POM 1 & 2, that owned by Datuk Tan Thian Siang, entered Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils. ed on our investigation, there is sufficient proof to show the relationshio/ ownership between Datuk Tan Thian Siang with Tetangga Akrab POM 1&2 and Pure Green Development. However, the alleged deforested nich was formerly a forest reserve was later turned into state own land, which is now own by the Royal Family of Terengganu state.	On-going monitoring/ verification
10 Harn Len Corporation Berhad	N	Y	06-Jul-21	Earthqualizer's Supply Chain	16 ha deforestation at Harn Len Realty (Serian) 2.) Based 5dn Bhd (Serian, Sarawak) in the period of May'21	ear 2020, Mewah recieved CPKO supply from Wilmar's Bintulu Edible Oils (BEO). ed on our traceability record, we do not source CPO from Harn Len in the past 2 years and hence there is no linkage between Mewah Group and Harn Len. Our last purchase from Harn Len's Lian Hup POM was in y 2020. Thereafter, the mill switched its ownership to Far East Holdings and renamed as Cenderawasih POM. his, we have sought Wilmar's confirmation if BEO is still sourcing PK from Masranti Plantation POM in the year 2021. At time, we had engaged with Wilmar's Sustainability Team to seek investigation to this ce.	On-going monitoring/ verification

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11	. Tamaco Grou	up	Ą	Ν	06-Jul-21	Earthqualizer's Supply Chain Report	A total of 327ha deforestation detected in Semai Mekar Sdn Bhd, Bintulu in the period of 2016-April 2021 i. 322ha (2016-2020) ii. Sha (April 2021)	<ol> <li>1.) Tamaco oil mill is a regular supplier to Mewah Datu Sdn Bhd.</li> <li>2.) The engagement was initiated with Tamaco team in early Jun-21.         <ul> <li>a.) In early July-21, Tamaco provided a chronology of de-forestation grievance record of the subject grievance.</li> <li>b.) In this chronology, Tamaco declared a recovery plan has been established and submitted to Wilmar for verification on 11 Jan-20. Nevertheless, all the approved assessors with ALS license unable conduct HCV-HCS assessment for the area to determine the liability amid COVID-19.</li> <li>c.) Since 31 Oct-19, Tamaco has commited to No New Planting and No New Development in Semai Mekar Sdn Bhd.</li> </ul> </li> <li>3.) Base on ground checking on 12 June 2021, the Sha "Earthqualizer-detected" deforested area has been cleared by the owner / native for their own purpose inside their NCR land.         <ul> <li>a.) Letter from Tuai Rumah – dated 12 Jun-21; that the Owner of this piece of native customary rights (NCR) Land admitted deforestation of 5 ha land for timber purpose due to poverty as he lost his income due to COVID-19. The Owner perceived that since he is the rightful owner of the NCR land and hence, he has the rights to claim his assets.             <ul> <li>b.) Letter from Rumah Panjang – dated 25 April-20; that the Owner acknowledged clearance of 19 ha took place in its NCR land for the purpose of timber to build long house for its families.</li> </ul> </li> <li>4.) Tamaco As further elaborated in the chronology of order that the 300+ ha deforestation detected in the period of 2016 – 2019 has been committed for a recovery plan under the guidance of Wilmar's sustainability department.</li> <li>6.) Mewah will continue engaging Tamaco on the progress of recovery plan.</li> </ul></li></ol>	On-going monitoring/ verification
12	Innoprise Planta	ations	Ν	¥	14-Jul-21	Earthqualizer's Supply Chain Report	Deforestation: a.) 17ha deforestation at Maliau Estate in the period of 2016 till Apr-21 b.) 12ha deforestation at Lokan Estate in the period of May-21 c.) 8 ha deforestation at Labau Estatee in the period of May-21 d.) 18 ha deforestation at Gunung Rara Estate in the period of May-21	<ul> <li>(i.) On 7 Jul, IPB responded that the logged area at Lokan, Labau and Gunung Rara estate are non-forested areas and was previously heavily logged area that had turned into a degraded area today.</li> <li>(ii.) The purpose of land clearing is not for oil palm planting, it is for Laran trees planting ("softwood timber"). The project is listed in the Malaysian Green Agenda 2020/21 *100million tree-planting campaign.</li> <li>(iii.) We have further wrote to Innoprise to request for photographs as to substantiate the area is a degraded area and a non-forest area.</li> <li>In August -21, Mewah engaged with IPB through Tier 1 supplier- Wilmar for the subject grievance. Through documentation review and ground verification, Wilmar concluded that the clearing is not for oil palm</li> </ul>	Closed
13	KPN Corp (KP	PN)	Y	N	04-Jun-21	Community grievances to RSPO & POIG members by NGO, lemBAH	Agrarian problems and other unsustainable practices at PT Putra Lirik Domas (PT PLD)	<ol> <li>KPN Plantation is a regular CPO supplier to Mewah Group. Our last purchase was in Year 2020. Upon receiving the grievance, we approached KPN's sustainability team to seek clarification.</li> <li>On 10-Jun-21, KPN issued an initial response of PT PLD regarding the subject grievance, the reference document may be found here: http://kpnplantation.com/assets/gama-files/pressrelease/Initial_Response-Rev.pdf</li> <li>Mewah commits to continue working closely with KPN in addressing the subject grievance.</li> </ol>	On-going monitoring/ verification
14	Perbadanan Kerr Pertanian Selango	- 1	Y	N	21-May-21	Chain Reaction Reserch'Apr21	Clearing peat swamp forest in Sabak Bernam District	<ol> <li>Cahaya Muda Oil Mill is a long-term CPO supplier to Mewah Group. The subject grievance demonstrates supply chain link between Cahaya Muda Oil Mill and PKPS where Cahaya Muda source FFB from PKPS via I, L.C. Hing Enterprise Sdn Bhd (a FFB Dealer).</li> <li>Mewah work together with Cahaya Muda and L.C. Hing in engaging with key management representative in PKPS through online virtual meeting and email exchange. In a meeting with PKPS on 3 June-21:         <ul> <li>a.) PKPS assured its commitment towards NDPE policy and reinstated there is no violation in its NDPE commitment.</li> <li>b.) PKPS stressed that the "Selangor Smart Agro Park project" is only at launching status and no development has been recorded. There was no plan to build a palm oil mill within the concession as alleged in CRR report. PKPS assured no oil palm plantation is to be developed in the "Selangor Smart Agro Park project" and emphasized the said project has been called to stop on 8 April 2021, pending evaluation outcome by Department of Environmental (Putrajaya).</li> </ul> </li> </ol>	On-going monitoring/ verification
15	Astra Internation	nal Tbk	Ŷ	N	03-May-21	Mighty Earth Report #33	100ha deforestation within Martabe Mine area of PT Agincourt Resources Tbk	<ol> <li>Mewah sourced 11,700.05MT CPO from PT Astra Agro Lestari - PT Letawa in 2019.</li> <li>The Martabe Mine is a "Gold Mine Project" in South Tapanuli; covers 479 hectares with a operating capacity exceeding 6 million tonnes of ore per year.</li> <li>This grievance case will be treated as ineligible as it is irrelevant to the core business of Mewah.</li> <li>In Aug 2021, Mewah wrote to United Tractors (PT Agincourt Resources) to seek confirmation if the Company is signing a MOU with IUCN to conduct a research study on Orang Utan, and commited to monitorium on new land development.</li> </ol>	Closed/ Irrelevant

16 <sup>E</sup>	oustead Plantation Sdn. Bhd.	Y N	18-Feb-21	Starling & Satelligence's Supply Chain Report	51.6 hectares of land clearance is detected in Boustead Ladang G&G in Q3 2020	<ol> <li>Boustead Plantation is a regular CPO supplier to Mewah Group.</li> <li>Mewah received deforestation alerts from a buyer, who is a subscriber to Starling and Satelligence. We reached out Boustead Plantation's Sustainability Team to seek clarification.</li> <li>Boustead Plantation initiated investigation to the alleged deforestation concession at G&amp;G Estate (Coordinates: 5.08'22"N, 117.43'48.8"E)</li> <li>The following are the findings from investigation:         <ol> <li>In alleged deforestation area located outside the boundaries of G&amp;G Estate, that is close to the security gate to the estate.</li> <li>In the detected deforestation concession is Ladang Irat, that is owned by Perbadanan Kemajuan Pertanian Selangor (PKPS). Ladang Irat is an oil palm plantation that is currently undergoing replanting work.</li> <li>The work of felling and chipping the old palm has been taking place since year 2020.</li> <li>Boustead Plantation confirms that there is no encroachment within G&amp;G Estate and/or at boundaries of G&amp;G Estate, which is close to Malua Forest Reserve.</li> </ol> </li> <li>After evaluating all available evidences, we decided to close the grievance case.</li> </ol>	Closed
17 (J	ʻfayasan Pelajaran Johor ohor State Government) - YPJ Plantations Sdn Bhd	NY	26-Jan-21	Mighty Earth (RRR# 32)	78 hectares of forest were cleared in the YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara) concession between 26 Oct 17 to Oct 20.	<ol> <li>Alaf Palm Oil Mill is the subsidiary of YPJ Plantations Sdn Bhd (refer to MSPO certificate of Alaf Palm Oil Mill). Meanwhile, YPJ Plantations Sdn Bhd is a government-linked company to Yayasan Pelajaran Johor (YPJ).</li> <li>In year 2020, our refinery, Mewaholeo Industries Pasir Gudang sourced 240MT CPO from Alaf Palm Oil Mill via a string contract from a third-party supplier.</li> <li>Base on preliminary investigation (updated 27 Jan 2021):         <ul> <li>a.) Ladang SSI Sg Ara (GPS coordinate: 2.024186, 103.865301) was acquired by YPJ Plantations Sdn Bhd (YPJP) from Johor State Secretary Incorporated (SSI) in March 2016.</li> <li>b.) The land was initially awarded by the Johor State Government to SSI and it was gazetted as 'Lot Pertanian Kelapa Sawit' (agricultural land for oil palm) back in year 2012.</li> <li>c.) YPJP is a government-linked company (GLC) to the Johor State Government. YPJP started the development of the cultivation of oil palm trees in 2018 and completed in early 2019.</li> </ul> </li> <li>Due to restricted movement control order in the country, Mewah will continue work with YPJ Plantations to identify potential land clearing/ NDPE violation in Ldg. SSI Sg. Ara.</li> </ol>	On-going monitoring/ verification
	(Ladang SSI Sg Ara)		18-Feb-21	Earthqualizer's Supply Chain Report	area of 12 ha on 2017 and 48 ha on 2018 at Ladang SSI Sg Ara concession (GPS:	<ol> <li>According to YPJ Plantation, the alleged land was leased from Johor State Government on 30th Aug 2017 for a period of 25 years.</li> <li>After completion of acquisition, the YPJ management team visited the land in Nov 2017 to assess geographical and biodiversity features on the land. During the visitation, the team noted signs of logging and land clearing done by the surrounding locals.</li> <li>YPJ further clarified that the land clearing is not on the peat area as evidenced in the Soil Suitability Report by Department of Agriculture Malaysia. On top of this, YPJ Plantations has conducted internal assessment related to environmental impact prior to carrying out new land development.</li> <li>In Jan 2021, YPJ Plantation announced adherence to the NDPE criteria as described in their Sustainability Policy.</li> </ol>	venitation

18 Bunga Group	N	Y	26-Jan-21	Mighty Earth (RRR# 32)	<ul> <li>1. Value Greenworld Sdn Bhd is part of the Bunga Realty Sdn Bhd (Bunga Group). Bunga Group owns Sayong Plantation Sdn Bhd and Sungai Kahang Palm Oil Sdn Bhd.</li> <li>2. Sungai Kahang Palm Oil Mill is not a direct and/or indirect CPO supplier to Mewah.</li> <li>3. Sungai Kahang Palm Oil Mill appears in the CPKO supply base of Hok Huat POM, Jin Lee Oil Mill and PGEO Oil Mill.</li> <li>4. In this matter, we engaged directly with a Senior Management in Bunga Group on early Feb-21. Here's the gist of our engagement:         <ul> <li>a) Bunga Group has been notified of the same grievance in early Nov-20.</li> <li>b) Bunga Group has been working with the Sustainability Department of Bunge Loders since then; a NDPE policy has been adopted by the Group starting from 25 Jan-21 including an immediate moratorium to set conditions on any future oil palm plantation development.</li> <li>c) According to the PIC of Bunga Group, it has no prior knowledge of the deforestation activity carried out at Value Greenworld Sdn Bhd. The land was categorized as "shrubs and suitable for immediate planting" when enters into a sales and purchase agreement of this land. The PIC confirmed there was no clearing of primary or secondary forest in Value Greenworld.</li> <li>As of July 2021, Bunga Group has made a commitment to the development of a Recovery Plan at group level, for activity that has taken place from January 2016 onwards.</li> <li>Mewah will continue to assess the sustainability progress of the company closely.</li> </ul></li></ul>	On-going monitoring/ verification it
19 Perbadanan Kemajuan Negeri Pahang (PKNP)	N	N	26-Jan-21	Mighty Earth (RRR# 31)	93ha deforestation at PKNP Tembeling concession in the period of Jun-19 to Oct-20.       1.) The "Ladang Hulu Tembeling concession" is owned and operated by PKNP Agro-Tech Sdn Bhd. (a). PKNP Agro-Tech is the subsidiary of PKNP. PKNP is a state-owned company of Pahang.         93ha deforestation at PKNP Tembeling concession in the period of Jun-19 to Oct-20.       2.) PKNP Agro ownes 2 oil palm plantation companies under Pahang State Government to implement individual NDPE policy. We also expect the Pahang's state-owned companies to adhere to national agenda i.e. MSPO.         4.) After checking with all CPO suppliers base in Pahang state, we can confirm that non of our CPO suppliers are sourcing/ receiving FFB from PKNP.         5.) On Feb'22, (a). Both PKPP Plantation Sdn Bhd (PKPP) and PKNP are indeed separated entities, despite both are established by the Government of Pahang. (b). These two entities are managed by independently and formed for different purposes. Hence, based on the definition of group ownership from RSPO, PKNP is not related at Group level to Mewah.         6.) After evaluating all available evidence, we decided to close the grievance case.	Closed

Perbadanan Kemajuan D Pertaninan Negeri Pahang (PKPP Plantation)	Y N	20-Apr-21 05-Nov-20 09-Sep-20	Earthqualizer's Supply Chain Report <u>Mighty Earth (RRR# 31)</u> Mighty Earth (RRR# 30)	2ha deforestation at Ladang Cherating (Pahang) in the period of Jan-21 22ha deforestation at Ladang Cherating (Pahang) in the period of Mar-19 to Oct-20. 101ha deforestation at Sg. Charu (Pahang) in the period of Feb-19 to May-20.	1.) In the recent engagement with PKPP, the authority assured that:         a.) The Group and its subsidiaries are commited to a "stop work order" that issued on 25 Jan-21.         b.) All on-going oil pain plantation development works have since halted under the "suspension" of work order in compliance to its NDPE policy.         c.) The PKPP's "stop-work-order" letter is available at this website: URL link : https://ndpe.pkpp.gov.my/bulletin.html         2.) In Feb 2021, Mewah decided to cease sourcing from Dominion Square Palm Oil Mill and LCSB Lepar Palm Oil Mill, until and unless the group has demonstrated significant sustainability progress and committed on a irrevocable recovery plan.         3.) In Oct 21, PKPP has       a.) published a NDPE policy on it website https://ndpe.pkpp.gov.my/index.html         b.) proposed two recovery projects in Merapoh Kuala Lipis with a total area of 202ha to conserve the remaining forest areas and and in Bebar Pekan with a total of 103ha of peatland to conserve the remain in its natural state.         1.) Dominion Square POM and LCSB Lepar POM are regular active suppliers to Mewah Group.         2.) The engagement was initiated with the Plantation Director of PKPP Agro in early Nov-20.         a) PKPP management has set aside two land banks located at Lipis, Phang (426 ha) and Pekan, Pahang (130 ha) for its recovery plan.         c.) A group-wide NDPE policy is in the pipeline, pending for withing encoression of PKPP.         d.) A full implementation of NDPE policy is expected to be done latest by 1 Jan-21.         3.) In Jan 2021, PKPP has         a) In Jan 2021, PKPP Plaunched a sustainability da	On-going monitoring/ verification
1 Yayasan Pahang	Y N	09-Sep-20	Mighty Earth (RRR# 30)	1,807ha of new oil palm development on peatland and clearance preparation/ stacking line of 1,216ha in concession YP Plantation Sdn. Bhd., Pahang in the period of Jan-19 to Jun-20.	<ul> <li>a) published a NDPE policy on it website https://ndpe.pkpp.gov.my/index.html</li> <li>b) proposed two recovery projects in Merapoh Kuala Lipis (with a total area of 202ha) to conserve the remaining forest areas and and in Bebar Pekan (with a total of 103ha of peatland) to conserve the remain in its natural state.</li> <li>1.) Reference made to our engagement with Far East Holdings Bhd, IKHASAS Group, Yuwang Group, and Sime Darby, the responses are summarized as follows: <ul> <li>a. The Board of YP Plantation has approved the implementation of NDPE policy in all plantation owned by YP Plantation Sdn Bhd. The official Sustainable Palm Oil Policy (in Bahasa Malaysia) dated 18 August 2020 from YP Plantation Bhd was provided and Mewah has already shared the policy to Mighty Earth.</li> <li>b. YP Plantation explained its dictision to develop the oil palm plantation was basis approval from the local authorities and it adheres to the state regulations. A full EIA assessment has been condected and approved by the Department of further explained that the Board of YP Plantation Sdn Bhd has issued a stop work order on the development on peat in the Gugusan Bebar concession in Pekan Pahang of 4,093.95 hectare on 17 August 2020. A stop work order heas been issued on the remaining 800Ha unplanted area of the new development namely Ladang Pekan Timur and Ladang Pekan Barat.</li> <li>d. YP Plantation is engaged in discussions with a consultant - Dr. Faizal Parish, Director of the Global Environment Centre (GEC) to study potential remedial actions.</li> <li>2.) On January 2021, YP Plantation has formally appointed Global Environment Centre (GEC) to facilitate an initial three-years of the Recovery Project.</li> <li>b. The recovery plan is developed, a Global Environment Centre (GEC) to facilitate an initial three-years of the Recovery Project.</li> <li>b. The recovery plan is developed, a Global Environment Centre (GEC) to facilitate an initial three-years of the Recovery Project.</li> <li>b. The recovery plan is develo</li></ul></li></ul>	On-going monitoring/ verification

2 Amanah Saham Pahar	g	Y	N	09-Sep-20	Mighty Earth (RRR# 30)	Deforestation avitivies detected at 3 concessions: 33ha Mentiga Corporation Bhd (area A), 58 ha Mentiga Corporation Bhd (area B) and 156 ha Berabong Estate; during period of Apr-18 to July-20.	<ol> <li>Reference made to our engagement with Far East Holding Bhd, Chin Teck and Yuwang Group, the responses are summarized as follows:         <ul> <li>(a). Since July 20, ASPA is adopting to a new comprehensive set of NDPE policy and pledges with immediate moratorium on new land development.</li></ul></li></ol>	On-going monitoring/ verification
3 Permata Hijau Group		Y	N	25-Aug-20	Rainforest Action Network (RAN)'s report titled." Permata Hijau exposed again for sourcing conflict palm oil. "	Presence of PT. Surya Panen Subur (SPS) in Permata Hijau's supply chain	<ol> <li>In the period of Jan – Jun 20, Mewah-Oils (Port Klang) sourced 3,000MT CPKO directly from Permata Hijau Group.</li> <li>On 30 Jun-20, RAN released a report "Permata Hijau exposed again for sourcing conflict palm oil". The report reveals that Permata Hijau Group was sourcing palm oil from PT. Surya Panen Subur II (PT SPS II). This is despite PT SPS II has been confirmed as a non-NDPE compliance party and it was listed in "No Buy" list by many major brands. PT SPS II was found to have destructed Leuser Ecosystem's Tripa peatland forest, that were once home to the highest density population of Sumatran orangutans in the world.</li> <li>During recent engagement in Aug-20, Permata Hijau confirmed that it had suspended all CPO purchase from PT SPS II.</li> </ol>	Closed
4 Instant Star Holdings Sdn Bhd		N	Y	12-Aug-20	Forest Clearance for Oil Palm	Deforestation of 1,300 ha land between 2016 and 2019 at Aspirasi Kristal Sdn. Bhd (area A). Further deforestation analysis detected 102 ha of forest was cleared in area A since January 31, 2019 and July 19, 2020.	<ol> <li>In Jan - Jun'20, Mewah source CPKO from Wilmar Sandakan Edible Oils. UM - Sabang 1 POM and Sabang 2 POM are the PK suppliers to Wilmar Sandakan Edible Oils.</li> <li>In our engagement with Wilmar, it is understood that:         <ul> <li>a. UM has already engaged with Aspirasi Kristal and Satria Eramaju, where both their FFB suppliers are required to adhere to the NDPE policy.</li> <li>b. Aspirasi Kristal has stopped their land clearing activities in July 2020, while Satria Eramaju do not have any active clearing activities.</li> <li>c. Engagement with these companies are still ongoing, updates will be made available when there is new development to the case.</li> <li>d. Further update on 10 Sept 20: According to the management of Aspirasi Kristal, the areas as indicated were cleared last year. However, the recent activities involve construction of terraces and road development of the cleared areas.</li> <li>e. Notwithstanding the above, UM has already suspended the FFB supply from Aspirasi Kristal until they are able to provide supporting evidence to their claims.</li> </ul> </li> </ol>	Suspended

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25	Sime Darby Plantation Bhd	Y	Y	14-Jul-20	Liberty Shared	Forced labor and child labour issue within SDP's operation	gaged with Sime Darby immediately to seek for clarification on the alleged deforestation. An internal investigation has been conducted through desktop analysis and ground truthing. Reference made to Sime ntation's response as follows: ant to the report, our desktop verification on the coordinates (3.353, 113.39) showed that it falls outside of SDP's operational area; approximately 100 meters away from our Rajawali Estate boundary. This was by an on- site verification which further confirmed that the deforested area mentioned in the report directed to a neighbouring third party local agricultural company. ress statement response as follow ww.simedarbyplantation.com/media/pressreleases/statement-response-rapid-response-palm-oilreport-19-mighty-earth December 2019, RSPO has published the boundaries of Sime Darby's concessions in Sarawak, which includes Derawan SOU 33 area. Following further engagement between Sime Darby and Mighty Earth the issue of the concession boundary, this matter has been resolved to Mighty Earth's satisfaction.	
						Deforestation at Derawan (SOU 33) concession in Sarawak during Feb - Aug 2019	<ol> <li>In Jan – Jun'19, Mewah sourced CPO and CPKO directly from Sime Darby palm oil mills and kernel crushing plant to our refineries.</li> <li>We engaged with Sime Darby immediately to seek for clarification on the alleged deforestation. An internal investigation has been conducted through desktop analysis and ground truthing. Reference made to Sime Darby Plantation's response as follows:         <ul> <li>(a.) Pursuant to the report, our desktop verification on the coordinates (3.353, 113.39) showed that it falls outside of SDP's operational area; approximately 100 meters away from our Rajawali Estate boundary. This was followed by an on- site verification which further confirmed that the deforested area mentioned in the report directed to a neighbouring third party local agricultural company.</li> <li>(b.) Full press statement response as follow http://www.simedarbyplantation.com/media/pressreleases/statement-response-rapid-response-palm-oilreport-19-mighty-earth</li> <li>(a.) On 23 December 2019, RSPO has published the boundaries of Sime Darby's concessions in Sarawak, which includes Derawan SOU 33 area. Following further engagement between Sime Darby and Mighty Earth's satisfaction.</li> </ul> </li> </ol>	Closed
26	Shin Yang Group/ Sarawak Oil Palm	Y	Ν	21-Apr-20	Mighty Earth (RRR# 13 and 25)	I.) Linau Mewah - Linau Sinar Oil Palm Estate: 10 ha peat development & 9 ha deforestation in 2019.	<ol> <li>In 2019, Mewah sourced CPO and CPKO from 6 palm oil mills of SOPB.</li> <li>SOPB rolled-out a well-defined No Deforestation, No Peat, No Exploitation (NDPE) policy on January 2019. However, there is a gap as the common industry's NDPE policy is generally committed on a cut-off date of 31 Dec 2015.</li> <li>Mewah first initiated sustainability engagement with SOPB on May 2019. SOPB insisted that, "SOP and SY are separate legal entities. The policies of SOPB are set by a diverse and independent board representing various investors such as the State Government of Sarawak amongst others. No single investor is in a position to dictate over the decisions made for to be made by the Board. In short, we wish to assure you that all major corporate decisions are deliberated by our Board and subsequently adopted by SOP Management including the Group Executive Chairman Tan Sti Datuk Ling Chairing Ho, ontrary to any other held views on SOP's decision making process or assumptions that SOP and SY are materially linked by virtue of a common chairmanship. The Chairman is without doubt guided by the policies established by the Board and SY is only to be treated like any other investor who may remain vested or exit based on return on investment."</li> <li>In a nutshell,</li> <li>SOP Bhas its rown board of directors and it claims to operate independently of Shin Yang Group.</li> <li>SOP Bhas its rown board of directors and it claims to operate independently of Shin Yang is a supplier to Sarawak Oil Palms (SOP)." As such, Mewah has reached out SOPB to verify if the alleged concession, Lina USIP Palme State is in the supply chain. Further information will be updated once credible evidence is presented.</li> <li>Mewah will continue assess the situation more closely. The engagement with the supplier will continue.</li> <li>Our last purchase from SOPB is in Dec'2019.</li> </ol>	On-going monitoring/ verification

27	QL Resources Bhd	Y	N	21-Apr-20	Mighty Earth (RRR# 21)	50 ha deforestation at PT Pipit Mutiara Indah (PT PMI) a subsidiary of QL Resources Bhd, located in North Kalimantan in the period of Jan -Oct-19.	<ol> <li>In Jan - Dec'19, Mewah sourced CPO from 2 palm oil mills of QL Resources Bhd.</li> <li>The alleged deforestation concession reported in RRR #21 was referring to PT Pipit Mutiara Indah ("PT PMI"). PT PMI is a subsidiary of QL Resources Bhd, located at N</li> <li>Mewah initiated sustainability engagement with QL Resources Bhd and PT PMI. The company acknowledged that land clearance activity at "regeneration scrubs" are of PT PMI, the company was was having a misunderstanding towards the definition nof No-Deforestation and it wasn't aware that "regeneration-scrub areas" is also clas concession has been felled in several years ago and it was being cleared again for oil palm planting purpose. The HCS/HCV assessments was never carried out prior to lar immediately. The company has promised to conduct integrated HCV-HCSA Assessments and to follow the HCVRN's ALS quality assurance process prior to all future new limmediately. The company has promised to conduct integrated HCV-HCSA Assessments and to follow the HCVRN's ALS quality assurance process prior to all future new limmediately. On top of the moratorium, QL affirmed its commitment towards NDPE compliance and it commits to stay align with the present industry's expectation.</li> <li>Mewah will continue to assess the sustainability progress of the company closely.</li> </ol>
				09-Apr-20	Chain Reaction Report, entitled "Tabung Haji Plantations to Develop New Oil Palm Concession, Once Again Breaching Buyers' NDPE Commitments "	New land development in concession Deru Semangat Sdn. Bhd., at Pahang, Malaysia without HCS assessment.	<ol> <li>TH Plantation Bhd ("THP") has been a long-term CPO supplier to Mewah Group.</li> <li>Reference is made to our engagement with THP, the alleged concession, Deru Semangat Sdn. Bhd. ("DSSB"), is a joint venture company between Lembaga Tabung Ha entered into a Management Agreement with DSSB to manage their oil palm plantation of approximately 30,000 acres in Jerantut, Pahang.</li> <li>The Environment Impact Assessment (EIA) of DSSB concession has been approved for 10,000 acres. As to-date, total 9,407 acres have been cleared for development.</li> <li>The new top management of THP which took over the realm of THP Group in year 2019, was aware of the non-compliance of DSSB Project against NDPE commitmen Management Agreement with DSSB in year 2019. Finalized agreement and hand-over process will be executed in end of Aug 2020.</li> <li>THP's management has stated their commitments towards NDPE in THP Sustainability Policy, with effective date on 27 Feb 2019. http://www.thplantations.my/doc/</li> <li>Mewah will continue assess the situation more closely and changes so as to constantly assessing potential sustainability risk level in THP.</li> <li>On 8 Oct 2020, Mewah's representatives met with the Senior Management representatives of TH Plantation. The key outcomes from this meeting are summarized as a. On 2 Oct-20, Lembaga Tabung Haji (LTH) has declared a moratorium on new land development in DSSB Ladang Tembeling.</li> <li>THP is finalising the termination of Management Agreement with DSSB.</li> <li>THP assure that it will unconditionally assist LTH to unwind its shareholdings in DSSB to permanently cut off THP's link from DSSB.</li> <li>THP is considering potential recovery plan in collaboration with a suitable NGO/ consultant.</li> <li>On 2 Aug 2021, TH Plantation agreed to a 7 years recovery plan, to rehabitate degraded forest area in Nenasi, Pahang with Global Environment Centre.</li> </ol>
28	TH Plantation Bhd	Y	N	24-May-18	Mighty Earth	Deforestation at its PT Persada Kencana Prima (North Kalimantan), Hydroflow Sdn Bhd plantations in Sarawak and Ladang Tabung Ha in Sarawak.	<ol> <li>Mewah receives CPO supply from Tabung Haji's palm oil mills base in Peninsular Malaysia i.e., Bukit Lawiang Palm Oil Mill and Kota Bahagia Palm Oil Mill.</li> <li>Mewah has completed supply chain assessment to Bukit Lawiang Palm Oil Mill including, FFB traceability assessment, and social-environmental impact assessment. T</li> <li>It is confirmed that CPO supplied from Tabung Haji has its FFB supplied from Malaysian-base plantations. The CPO originated from Tabung Haji's Indonesian mills do r</li> <li>Through an email between Mewah and TH Plantations on 29th Mar 2019, TH Plantations has completely ceased all deveopment in PT Persada Kencana Prima (PT PK planting on the cleared land have been carried out since then.</li> <li>Any sign of land clearing in PT PKP are the work of IPK permit holders who continue logging actitivies at TH Plantations concession. There are few IPK concessionaire: government, before TH Plantations acquired the HGU for the land. Hence, TH Plantations is in the process of engaging with the local authorities and IPK permit holders the foll basen issued since September 2018. No heavy machineries have been placed within the estates and no funds have been channelled to Hytorflow Sdn. Bdh., TH Plantations to seek for explanation for the allegation on Ladang Tabung Haji. The satellite image and land use maps are of which were estates under the stable of Ladang Sawit Bintulu Sdn. Bhd., a joint venture company between its parent, Lembaga Tabung Haji and a local based company estates, however Tabung Haji had disposed the said estates to a third party in 2002.</li> <li>As at date of publication of this report, no further evidence is presented to support this allegation.</li> </ol>

ated at North Kalimantan. rubs" area was untentionally. As illustrated by the spokperson also classified as High Carbon Stock (HCS) area. The rior to land clearance. es in the non-compliant development sites have been halted ure new land development.	On-going monitoring/ verification
abung Haji and the Pahang Royal Family. In 2015, THP had opment. nmitments. THP has decided to terminate in totality the .my/doc/THP_Sustainability%20Policy_Final_v1.pdf narized as follows:	On-going monitoring/ verification
ssment. The outcome was satisfactory. mills do not take place in Mewah's supply chain. na (PT PKP) since mid-2018. No land clearing activities and no ssionaires who were given the license to log by local holders to cease the logging activities. o neighbouring estate. A stop work order on Hydroflow Sdn. Bhd. for any further development. maps are those of Ladang Sebauh and Ladang Semilajau, both company. TH Plantations was the managing agent for these	On-going verification/ monitoring

					Coalition against Land Grabbing (CALG),	Land grabbing & land conflict, precarious workers' conditions, environmental impacts of	1.) In Jan - Dec'19, Mewah sourced CPO from Agumil Plantation Inc (API) at one of our refinery, Mewah Datu Sdn. Bhd. 2.) On 28 Feb, two social NGOs i.e. CALG Palawan, Forest People Programme raised a sustainability grievance on API through writing to Mewah.	
29	Agusan Plantations Inc	Y	N	04-Mar-20	Forest People Programme (FPP)	expansion as well as disputed land tenure of indigenous people & local communities financing of operations.	<ul> <li>3.) On early March, Mewah reached out to API to seek immediate clarification on the allegation. Concurrently, Mewah announced suspension on all procurement activity from API until and unless the supplier is capable to address the grievance appropriately.</li> <li>4.) As at date of publication of this grievance log, we are still engaging with API for a constructive response.</li> </ul>	Suspended
30	Pinehill Pacific Bhd	Y	N	04-Mar-20	Mighty Earth (RRR# 18)		<ol> <li>In Jan – Dec'19, Mewah sourced CPO directly and CPKO indirectly from Pinehill Pacific, located in Teluk Intan, Perak, via Mewah-Oils Sdn. Bhd.</li> <li>The alleged deforestation concession reported in RRR18 is located at West Kalimantan, known as PT Makmur Jaya Malindo ("PT MJM"), which was a subsidiary of Pinehill Pacific Bhd. Based on our conversation with Pinehill Pacific Bhd has divested their Indonesia operations and it had no longer management control over PT MJM.</li> <li>As at date of publication of this report @ 23 Mar 2020, no positive response from Pinehill Pacific Bhd. At the same time, Mewah announced suspension on all procurement activity from Pinehill Pacific Bhd until and unless positive progress is demonstrated by the supplier.</li> </ol>	Suspended
31	NPC Resources	Ν	Y	08-Jan-20	Mighty Earth (RRR# 23)	Deforestation and/or peat development of 1,047 ha at PT Sumber Alam Selaras concession during the period of Sept-Nov 2019.	<ol> <li>In Jan – Dec'2019, Mewah sourced CPKO indirectly from NPC Resources from IOI Edible Oils (Sandakan).</li> <li>Mewah immediately reached out IOI to seek for clarification on the alleged deforestation at PT Sumber Alam Selaras (PT SAS).</li> <li>Reference is made to IOI's response on 20th Jan 2020:         <ul> <li>Due to the forest fires happened in Sept' 2019 in Indonesia, it destroyed over 400 ha of their older planted palms inside PT SAS's concession, in addition to some of the conservation areas.</li> <li>It was confirmed by Aldenvironment that, it was the fire that caused the land use change and not "deforestation".</li> <li>According to PT SAS, the root cause of the fire took place in their concession is yet to be confirmed. It could be due to strong wind conditions which spread ash and amber inwards or possibly trespassers smoking and disposing cigarette butts indiscriminately.</li> <li>Prior to dry season, PT SAS had conducted sharing session with the villages to prevent open burning used for land clearance, especially during extreme weather conditions.</li> <li>NPC resources and PT SAS adopted a no open burning policy and commit to commence further intensive programs with the local authorities and villagers on fire preventions and firefighting.</li> </ul> </li> <li>Having said that, the land use change is caused by fire spread from outside concession boundaries and is not land clearance for palm cultivation. It shall not be deemed as "deforestation".</li> <li>As at date of publication of this report, no further evidence is presented to support this allegation.</li> </ol>	On-going monitoring/ verification
32	Borneo Pacific Group	Y	N	08-Jan-20	Mighty Earth (RRR# 23)	70ha deforestation at PT Arjuna Utama Sawit concession in the period of Sept-Dec 2019.	<ol> <li>In Jan - Dec'19, Mewah sourced CPO directly from Golden Elate Palm Oil Mill, a subsidiary of Borneo Pacific Group at one of our refinery, Mewah Datu Sdn. Bhd.</li> <li>Mewah has reached out Borneo Pacific Group immediately since 15th Jan 2020.</li> <li>Through our engagement with Borneo Pacific Group, the Group responded that the alleged concession PT Arjuana Utama Sawit is neither a related compnay/subsidiaries of Golden Elate nor Borneo Pacific Group.</li> <li>As at date of publication of this log, there is no further evidence presented to support this allegation.</li> </ol>	Closed

:	333	Goodhope Holding		Y	Ν	06-Dec-19	Mighty Earth (RRR# 22)	39 ha deforestation at PT Rim Capital, a subsidiary of Goodhope during the period 11th September - 2nd November 2019.	<ol> <li>In Jan – Jun'19, Mewah sourced CPKO directly from one of the subsidiaries under Goodhope in Peninsular Malaysia, namely Premium Vegetable Oils.</li> <li>I'hrough our engagement with Goodhope since 6th Dec 2019, we understand that the supplier has taken the allegation seriously and verification process was carried out immediately after we reached out to them. The response from Goodhope is as follows:         <ul> <li>a) Map analysis confirmed that one of the land clearance areas (-2.661, 112.231) is located outside of the concession.</li> <li>b) The other location is within the concession area of PT RIM Capital. However, the company has no intention or plan to acquire the land for two reasons. Firstly, the land owners are not interested to relinquish the land. Secondly, the company is not going to develop these particular the lands due to peat soil. Good hope has committed to NDPE policy since May 2017.</li> <li>c) PT RIM Capital has not conducted any land clearance since 2012. There is no plan for new plantings at PT RIM Capital.</li> <li>a) IPR RIM Capital deployed a team together with village heads and community representatives from Benua Usang village and Tanjung Hanau village to conduct ground verification on Wednesday, 6th December 2019.</li> <li>Based on observations, the team found out that the alleged and clearing locations were areas burnt by landfres in September 2019. Goodhope has made and submitted a report to local authorities on the land fires that occurred in the vicinity of PT RIM Capital from Somet and or fires Report). The report highlighted the chronology of fire incidents occurring on 20th September 2019. It clearly stated that the fires were not commutely the company. If ine incidents or ginemate from burnt land or forests belong to local authority acknowledged the report and recognized the company's efforts to take immediate measures to extinguish and contain the fires.</li> <li>b) On 6 Mar 2020, Goodhope</li></ul></li></ol>	On-going monitoring/ verification
:	34 G	obal Enterprise Sdn Bhd	3	N	Y	09-Nov-19	Mighty Earth (RRR# 21)	17 ha deforestation and/or peat development at PT Bulungan Surya Mas Pratama - during Jan-Oct 19	<ol> <li>In Jan – Jun'19, Mewah sourced CPKO directly from IOI Edible Oils Sandakan (kernel crushing plant) to our refineries.</li> <li>We engaged with IOI to seek for clarification on the alleged deforestation. An internal investigation has been conducted through desktop analysis and ground truthing.</li> <li>Respond from our direct supplier, "Global has replied that this land clearance mentioned in Mighty Earth 21 is outside the concession boundaries of PT Bulungan Surya Mas Pratama and they are not involved with the clearance."</li> <li>Global Enterprise Sdn Bhd has checked on the ground and shared corrected information to update the situation.</li> <li>The land clearing observed is due to illegal encroachment by third party mining for gold. These third parties have also vandalised and destroyed property and palm planted by PT BSMP.</li> </ol>	On-going verification/ monitoring
	35	Tradewinds Plantation Berhad		Y	Ν	09-Dec-19	Mighty Earth (RRR# 17)	during Feb - July 2019 (**Remarks: According to Mighty Earth RRR17, Tradewinds is linked to CBIP via 2 JV companies namely Solar Green Sdn Bhd (where Tradewinds is reported to own 50% shares) and Kris Jati Sdn Bhd (where	<ol> <li>In RRR17, it was reported that PT Kurun Sumber Rezeki is a joint-venture between PT Jhonlin Agro Mandiri, Jhonlin Group (80%) and CB Industrial Product Holding Bhd, CBIP Group (20%).</li> <li>CBIP was reportedly owns 2 JV with Tradewinds i.e., Solar Green Sdn Bhd and Kris Jati Sdn Bhd.</li> <li>In Jan-Jun'19, Mewah sourced CPO from three Tradewinds' palm oil mills located in Peninsular Malaysia and Sabah.</li> <li>The respond from Tradewind to Mewah on 2 Aug-19, confirming that, " <i>Although CBIP holds 30% share in Kumpulan Kris Jati (KKJ), CBIP do not have management control over the operations of KKJ. At the same time, the company group that has management control of KKJ has no shareholdings in any of CBIP's oil palm operations under CBIP's management control. KKJ and CBIP does not share the same parent company, and therefore KKKJ is not part of the same group as CBIP."</i></li> <li>No further evidence is presented to substantiate the linkage between Tradewinds or Kumpulan Kris Jati with PT Kurun Sumber Rezeki.</li> </ol>	On-going verification/ monitoring
						12-Aug-19	Mighty Earth (RRR# 18)	Deforestation at Trans Kenyaland Sdn. Bhd. concession in Sarawak since Nov 2018 - July 2019	<ol> <li>In RRR18, it highlighted that Trans Kenyaland Sdn. Bhd. is a subsidiary (85%) of Amalan Penaga (M) Sdn. Bhd., which is wholly owned by Tradewinds Plantations Bhd.</li> <li>Trans Kenyaland Sdn. Bhd. is alleged for deforestation of 94 ha peat forest since Nov'18 to Jul'19 (GPS Coordinate: 1.361, 111.465).</li> <li>In Jan-Jun'19, Mewah sourced CPO from three Tradewinds' palm oil mills located in Peninsular Malaysia and Sabah.</li> <li>With reference to Tradewinds' response, based on a Land Use Change Analysis (LUCA), the alleged land clearance activities do not fall in Trans Kenyaland's boundary.</li> </ol>	On-going verification/ monitoring

36 Genting Plantation Bhd	Y	Ν	12-Apr-19	Mighty Earth (RRR # 14 & 15)	1.) Genting's Ayer Itam Palm Oil Mill is one of CPO suppliers to Mewah Group.         2.) A detailed supplier verification assessment has been completed at Genting Ayer Itam Palm Oil Mill including FFB traceability assessment, social-environmental impact assessment. The assessment outcome was satisfactory.         3.) CPO produced in PT Citra Sawit Cemeriang (PT CSC) & PT Permata Sawit Mandiri (PT PSM) DO NOT TAKE PLACE in Mewah's supply chain.         4.) Mewah reached out to Genting Plantations on or around mid April 19. On 25th Apr'19, Genting Plantation issued an assurance statement that PT CSC is in compliance with the RSPO requirement of New Planting Procedures since it commenced plantation development in 2014.         5.) On 29 Apr'19, Genting further confirmed that the HCS assessment PT CSC is being finalized by Aidenvironment. HCS assessment report will be submitted for peer review once completed. Meanwhile, a stop work ord on new land clearing has been put in place.         6.) According to Genting's letter dated 2 Jun 19 in respond to the allegations, - For PT CSM, "A stop work order on new land clearing have been put in place on 1st May 19" For PT PSM, "It has been disposed in 2017".         7.) Reference is made to Genting's letter dated on 6th Sept 19, the HCS report for PT CSC has beensubmitted for quality review by HCSA. Upon approval of this report then any further development on non-HCS will commence. Currently PT CSC is observing the Stop Work Order for any new development/land clearing.         8.) No further update from Genting Plantation since Sept'2019.	r Ongoing verification/ monitoring.
37 Kwantas	Y	Y	13-Apr-19	Mighty Earth (RRR # 14)	Deforestation at Kwantas Pelita Plantation (Balingan) Sdn Bhd concession in Sarawak in Feb-Mar'19.       1.) In year 2018, Mewah sourced CPO from three Kwantas's palm oil mills, i.e., Haranky Palm Oil Mill, Mewah Palm Oil Mill and Pintasan Palm Oil Mill, that located in Sabah.         2.) Through email conversation between Mewah and Kwantas on 8th May 2019: a) The land is located within the parameter of Kwantas Pelita Plantation (Balingan) Sdn Bhd (KPPSB) concession; b) However, it has never been surrendered to KPPSB through their Native Customary Right (NCR) Land Acquisition project. KPPSB has cross checked this with their NCR record and verified on this matter; c) As of yet, the land area belongs to two owners Akas Ak. Ngelambau and Beribun Ak. Baring; d) KPPSB has never involved on the activities conducted on the land.         3.) As at date of publication of this log, there is no further evidence presented to support this allegation.	On-going verification/ monitoring.
38 Double Dynasty - Radiant Lagoon Sdn. Bhd.	Ν	Y	11-Mar-19	Mighty Earth (RRR# 13); Bruno Manser Fund	<ol> <li>In year 2018, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils through Socship and Fimachem bulking installation.</li> <li>Reference to Wilmar's sustainability dashboard, DD Palm Oil Mill came into Mewah's supply chain throug palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils.</li> <li>Mewah has immediately reached out to our direct contractual supplier for supply chain verification. The engagement with our direct supplier is still in progress.</li> <li>Prior to the publication of Mighty Earth Rapid Respont 13 in Mar 19, Wilmar has initiated engagement with DD Palm Oil Mill since Feb'19. The first meeting was conducted on 11 Mar 19, where Wilmar has sought clarification and documentation evidence of Radiant Lagoon's operation.</li> <li>Through an email dated 25 Mar 19, Wilmar is in the pipeline of investigating the allegation of <i>'land conflict and deforestation at Radian Lagoon</i> " and confirming whether the moratorium of land clearing is in place. 18 - Jan 19.</li> <li>Jan 19.</li> <li>Jan 19.</li> <li>Jan 19.</li> <li>Jan 19.</li> <li>Jan 19.</li> <li>Jan 19.</li> </ol>	

39	FGV Y	γ	28-Nov-18	Coalition of NGOs (Rainforest Action Network ("RAN"), International Labor Rights Forum, SumOfUs);	1.) Suspension of RSPO P&C certificate for Serting Palm Oil Mill on 28th Nov 2018, due to allegation of the use of forced labour and poor- working conditions in FGV-owned plantations as well as unfair wages.	<ul> <li>1. In Year 2018, Mevah resched CPD sopply fem 18 FOY's paim of mills. Setting PAIm OI Mill is one of the supplied FOY's paim of mills. Mevah OIs (Pert Rand).</li> <li>2. On XDN Key 2008, CPV has made a public statement in respect of the finding of the XPD Completion barrel (C).</li> <li>3. On XDN Key 2008, CPV has made a public statement in respect of the finding of the XPD Completion barrel (C).</li> <li>3. On XDN Key 2008, CPV has made a public statement in respect of the finding of the XPD Completion barrel (C).</li> <li>3. On XDN Key 2008, CPV has made a public statement in respect of the finding organization statement in the State and the statement in the State and the statement in the Statement i</li></ul>	Ongoing verification/ monitoring.
						https://www.fgvholdings.com/wp-content/uploads/2020/10/Updates-on-the-CBP-WRO.pdf 20.) At present, all refineries under Mewah Group are adopting to a stringent raw material segregation plan in palm oil production production. A standard operating procedure (SOP) has been established and enforced in	

40 FGV	Υ	Y	11-Oct-17	Mighty Earth; Greenpeace	<ul> <li>A. PT Citra Niaga Perkasa, Landak Regency, West Kalimantan Province, Indonesia i.) FGV bought the Company in year 2012 for USD 10.60 million.         ii.) The Company is RSPO certified since year 2012.         iii.) Allegation on Deforestation &amp; Peatland development – the Company is alleged to clear a 240 hectares HCV forest on deep peatland that greater than 3 metres (&gt; 3m). B. PT Temila Agro Abadi, District of Landak and Village of Kuala Mandor, West Kalimantan Province, Indonesia. i.) FGV bought the Company in year 2013 for USD 4.2 million. ii.) The Company is RSPO certified since year 2014. iii.) Allegation on Deforestation &amp; Peatland development – the Company is alleged to clear a total 1,888 hectares of HCV forest and neatland     </li> </ul>	<ol> <li>It is pertinent to take notice that all FGV palm oil mills that make supply to Mewah are located in Peninsular Malaysia. We do not purchase any CPO or CPKO from FGV's subsidiaries in Indonesia since year 2014 when we first commenced CPD traceability exercise. Having said that, the CPO and CPKO produce in FGV's indonesian-based palm oil mills have no place in Mewah's supply chain.</li> <li>On 15 May 2017, Mewah has reached out to FGV on allegations of HCV clearance in their indonesian subsidiary, PTTAA. Felda is appointing a third-party assessor to verify the allegations.</li> <li>On 13 May 2017, FGV made public statement to restore more than 1,000 ha of peat forest in West Kalimantan after coming under pressure for its unsustainable deforestation.</li> <li>On 21 Angust 2017, FGV has updated on their "Kalimantan Peat Restoration Master Plan". FCV has enhanced their Sustainability Policy to reflect. "No Peat" development for all new planting irregardless of depth and when land was acquired. FGV has also committed to rehabilitating the peat lands that were previously cleared in PT TAA.</li> <li>S) FGV is engaging various tabeholders as part of preparing its action plan to address these issues. FGV will share their action plan with Mewah following which time-bound milestones will be developed. Mewah will monitor FGV's implementation of the action plan to address these issues. FGV will share their action plan with Mewah following which time-bound milestones will be developed. Mewah will monitor FGV's implementation of the action plan to source any palm oil from FGV's indonesian-base subsidiaries/plantations as a result of deforestation and peatland development.</li> <li>A) the present time, Mewah set the record straight that we will not source any palm oil from FGV's indonesian-base subsidiaries/plantations as a result of deforestation and peatland development.</li> <li>N) f10 to clober 2019. Mighty Earth highlighted FGV'S PT CNP in the Rapid Response Report 20.</li> <li>B) R</li></ol>	Ongoing verification/ monitoring.
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	11 Dir	bunan Hijau/Jaya Tiasa	N	N Y -	24-Sep-18	Greenpeace (Final Countdown report page 135/194)	Potential peatland clearance and forest clearance for oil palm development in Eastern Eden Estate (EEE), Sarawak and Gilford LTD, PNG.	<ol> <li>1.) Eastern Eden Estate (EEE) is an oil palm plantation that owned and operated by Jaya Tiasa, a subsidiary company of Rimbunan Hijau Group.</li> <li>2.) In the period of Jan-Jun 2018, Mewah-Oils (Port Klang) received about 200mt Crude Palm Kernel Oil (CPKO) from Wilmar's Bintulu Edible Oils as the raw material for our refinery. The receiving quantity stands at approximate 0.4% of our total sourcing quantity at the period.</li> <li>3.) On Jan-2019, Jaya Tiasa commits to implement NDPE policy in its operation. With reference to Wilmar's Sustainability Dashboard, it reports that Jaya Tiasa has confirmed there is no new land development on EEE and the land clearance reported in Greenpeace's Final Countdown report was not occured within EEE's concession. Jaya Tiasa has shared their groupwide concession map with Wilmar for on-going monitoring.</li> </ol>	On-going verification/ monitoring
	+1 KIII	uunan mijau Jaya nasa	N		10-Aug-20	Mighty Earth (RRR# 12)	Deforestation of 85 ha at LPF/0024 in Belaga Regency, Sarawak during period of Nov 2018 - Jan 2019.	<ol> <li>In the period of Jan-Jun 2020, Mewah-Oils (Port Klang) sourced CPKO indirectly from Rimbunan Hijau Group via Wilmar's Bintulu Edible Oils to our refinery.</li> <li>With reference to Wilmar's Grievance List, it reports that the land clearing is not related to oil palm development.</li> <li>As at date of publication of this report, no further evidence is presented to support this allegation.</li> </ol>	Closed
4	12	Goodhope Holding	Y	N	17-Aug-18	Greenpeace (Final Countdown report)	to comply to proper FPIC process at its	<ol> <li>1.) RSPO has registered an official complaint against PT Nabire Baru in December 2016 after received the complaint from Yayasan PUSAKA. On 5th May 2017, Goodhope published its first sustainability policy. In the interim, the Company has taken initiative to progressively updates their sustainability policy implementation plan.</li> <li>2.) In Apr 2018, Mewah received RSPO certified CPKO from Goodhope's Malaysia-based subsidiary, Premium Vegetable Oils Sdn. Bhd. Goodhope assured that PT NAbire Baru does not take place in PVO's supply chain.</li> </ol>	Closed
	13	BLD Plantation Bhd	N	Y	14-Jul-18	Mighty Earth (RRR# 4,5,6,7 & 11)	Deforestation at BLD Plantation Bhd concession in Sarawak since Mar - Dec 2018.	<ol> <li>In July 2018, Mewah received CPKO supply from BLD Plantations - Kirana Palm Oil Refinery Sdn Bhd, Sarawak through Butterworth bulking installation.</li> <li>Mewah has immediately reached out to our direct contractual supplier for supply chain verification. The engagement with our direct supplier is still in progress.</li> <li>Mewah decided to temporarily stop sourcing from the supplier until and unless the company shows positive progress to resolve the ambiguity.</li> <li>As of May'19, BLD Plantations announce engagement plan with Earthworm Foundation and publicly announced commitment on a Sustainable Palm Oil Policy with NDPE compliance.</li> <li>Since May 2019, BLD Plantations demonstrates significant progress, where the Company publish their sustainability commitments such as NDPE Policy, Sustainability Implementation Plan (Yr2019 - Yr2023), Traceability and more at http://dashboard.bldpb.com.my/.</li> <li>Mewah will continue to assess the sustainability progress of the company closely.</li> </ol>	On-going verification/ monitoring/ Suspended

44 Tee's Family / Prosper Group	Y N	11-Apr-18	Greenpeace; Chain Reaction	Tee Family Summary Report - Deforestation/ social exploitation in Bewani Oil Palm Plantation (PNG)	<ol> <li>Judsenvironemit engaged with Mewah about Tee Family report on 12 April 2018. We had reached out to Senior Management of Prosper Group, to convey our concern and provide recommendation/act augestrate by Audeminformation.</li> <li>Jin year 2018, we received CPD fors 8 Prosper's mills that base in Peninsular Malaysia. We completed supply chain verification program including PFB traceability and social-impact-assessment (SAI) at P Konfarm POM, Wung Management JPM. And feadur VDM. The assessment contractions:</li> <li>Prosper Group explained there is no direct linkage between Bewani PRQ and Prosper Malaysia, stating that Bewani is an investment by its minority shareholder with no commercial links to the Group.</li> <li>Prosper Group explained there is no direct linkage between Bewani PRQ and Prosper Malaysia, stating that Bewani is an investment by its minority shareholder with no commercial links to the Group.</li> <li>In broin 2013, Mewah decided to stop surgice PRO from Prosper due to the fact that the supplich has demostrated and thready and the all Prosper's mills in Proving and Malaysia. It is a forthely the released and an uncertain take place in Mewah</li> <li>In how 2013, Mewah decided to stop surgice PRO from Prosper due to the fact that the supplich has demostrated and link surgices.</li> <li>In In how 2013, Mewah decided to stop surgice PRO from Prosper due to the fact that the supplich has demostrated and links. The purchase of pain products from Prosper from poly compares are no longer be as PRO Group and the that all and uncertain and uncertain frame family from Bewani Of Tain Prosper Kampaement. The letter assured Prosper Group of Companies are no longer be as PRO Group and 19 and plantation investment, admit consequences and commit to undertake liability.</li> <li>In boos 2014, Prosper tast free that the supplementation plant States and plantation investment, farthworm will be supporting its NDPE polong implementation plantation investment admit consequences</li></ol>

concern and provide recommendation/action plan (that	
y and social-impact-assessment (SIA) at Prosper POM,	
with no commercial links to the Group.	
ng that all Prosper's mills in Peninsular Malaysia have its lew Guinea does not take place in Mewah's supply chain.	
uts from Prosper. The business relationship between	
Group of Companies are no longer be associated with any	
mmit to undertake liability.	On-going verification/ monitoring ( progess and development of recovery plan)
NDPE policy implementation and developing a more	
rosper Group since April-19.	
ade by Prosper Group since year 2019.	

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		21-Mar-18		-		
		21-Mar-18	Greenpeace; Mighty Earth (RRR #18, 27)	2.) Deforestation in Kalimantan - PT Tunas Borneo Plantations (PT TBP) in North Kalimantan, 2,867ha forest was cleared within concession between 2015 and 2017. Further deforestation is detected in PT Tunas Borneo Plantation in May 2019 - Apr 2020.	1.) Glenealy Plantations Malaysia-based subsidiaries - Timora Palm Oil Mill is a regular CPO supplier to Mewah.	
		21-Mar-18	Greenpeace	3.) Use of fire - apparent use of fire in land clearing process in Ome-Ome project in PNG.	<ul> <li>2.) In 2019, we carried out supply chain verification exercise i.e., FFB traceability audit and social-impact-assessment (SIA) to Timora Palm Oil Mill. The outcome was satisfactory. The factory is running on tightship with firmness that is proven through proper traceability documentation filed.</li> <li>3.) In May 2018, Glenealy Plantations (Glenealy) announced a moratorium on land clearing for oil palm planting in their Indonesia, Myanmar and Malaysia operations. In addition, Samling has divested from its PNG operations.</li> <li>5.) On 2 April 2019, Mewah reached out to Glenealy to seek clarification on deforestation allegation in Marudi &amp; Batu Belah.</li> </ul>	
Y	N	31-Dec-18	Mighty Earth (RRR #11, 15)	4.) Deforestation of 104ha in LPF /0006 Lana in Sept - Nov 2018.	with jungle trees as per the licence's condition which is aligned with the Sarawak State Government's pledged to plant 1 million hectare by 2025. Marudi LPF is certified under Malaysian Timber Certification Scheme (MTCS) and the operation is comply with Malaysian Criteria & Indicators of the MTCS.	Ongoing Monitoring/ Suspended
		31-May-19	Mighty Earth (RRR #15, 16, 18 19, 20, 21, 27)	<sup>5,</sup> 5.) Deforestation and clearance preparation in LPF /0007 Jelalong in Apr 2019 - Apr 2020.	regardless of depth with immediate effect. 9.)In Aug 2020, Glenealy rolled out corporate website to engage further with its stakeholders. http://glenealyplantations.com.my/ as one of the milestone under Glenealy Plantations' NDPE implementation plan. 10.) In Jan 2021, Glenealy informed Mewah about its timebound recovery plan, in collaboration with Malaysia Environmental consultants, a licensed assessor for HCV/HCSA. The company is identifying a forest restoration plan in Sarawak. At the same time, the company has engaged Deloitte Malaysia as its sustainability consultant and as an independent third party to verify its commitment towards NDPE policy.	
		30-Jun-19	Mighty Earth (RRR #17)	6.) Peat development of 6ha in LPF 0014 by Samling Timber Sdn Bhd in Jan - July 2019.	12.) In August-21, Glenealy published its first Sustainability Report for financial year 2020: http://glenealyplantations.com.my/docs/sustain/Sustainability%20Report%202020.pdf	
		31-Mar-19	Mighty Earth (RRR #13, 24, 26, 30)	7.) Deforestation in LPF/ 0008 Marudi & Batu Belah concession by Sampling Reforestation (Bintulu) Sdn Bhd in Jan 2019 - July 2020.		
	Y	Y N	Y N 31-Dec-18 31-May-19 30-Jun-19	21-Mar-18       Mighty Earth (RRR# 11, 15, 16         17, 18, 19, 20, 21, 24, 27, 30)         21-Mar-18       Greenpeace;         21-Mar-18       Greenpeace         21-Mar-18       Greenpeace         21-Mar-18       Greenpeace         31-Mar-18       Greenpeace         31-May-19       Mighty Earth (RRR #13, 16, 18         30-Jun-19       Mighty Earth (RRR #15, 16, 18         31-Mar-19       Mighty Earth (RRR #13, 24, 7)	Y       N       31-Dec-18       Mighty Earth (RRR #11, 15), 16, 18, 19, 20, 21, 24, 27, 30)       4.) Deforestation in Kalimantan - PT Tunas Borneo Plantation (MSPP) 5,700ha.         Y       N       31-Dec-18       Greenpeace       3.) Use of fire - apparent use of fire in land clearing process in Ome-Ome project in PNG.         31-Mar-19       Mighty Earth (RRR #15, 16, 18, 19, 20, 21, 27)       4.) Deforestation of 104ha in LPF /0006 Lana in Sept - Nov 2018.         31-Mar-19       Mighty Earth (RRR #15, 16, 18, 19, 20, 21, 27)       5.) Deforestation in Approxement of Sept - Nov 2019.	v         N         P1.March         Wegley face h (line 11, 12)         Wegley face h (line 11,