

Mewah Group Sustainability Grievance Log (Update as at May 2020)

No.	Date Logged	Target of Grievance (Mewah's Subsidiaries or Independent Suppliers)	In Mewah's Supply Base	Stakeholder	Issue Under Review	To-date action taken by Mewah	Status
1	21-Apr-20	Shin Yang Group/ Sarawak Oil Palm	Yes, supply from Sarawak Oil Palm.	Mighty Earth (RRR# 13 and 25)	i.) Linau Mewah - Linau Sinar Oil Palm Estate: 10 ha peat development & 9 ha deforestation in 2019.	<p>1.) In 2019, Mewah sourced CPO and CPKO from 6 palm oil mills of SOPB.</p> <p>2.) 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.</p> <p>3.) 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 or 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 Sri Datuk Ling Chiong Ho, contrary 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."</p> <p>4.) In a nutshell, (i.) SOPB has its own board of directors and it claims to operate independently of Shin Yang Group. (ii.) SOPB is treating Shin Yang as any other third-party supplier of palm products and subject to its Grievance Process.</p> <p>5.) Reference made to Mighty Earth RRR# 25, Mewah is linked to Shin Yang Group because "<i>Shin Yang is a supplier to Sarawak Oil Palms (SOP).</i>" As such, Mewah has reached out SOPB to verify if the alleged concession, Linau Sinar Oil Palm Estate is in the supply chain. Further information will be updated once credible evidence is presented.</p> <p>6.) Mewah will continue assess the situation more closely. The engagement with the supplier will continue.</p>	On-going monitoring/ verification
2	21-Apr-20	QL Resources Bhd	Yes, supply from QL Resources Bhd	Mighty Earth (RRR# 21)	Deforestation of 50 ha at PT Pipit Mutiara Indah (PT PMI) a subsidiary of QL Resources Bhd, located in North Kalimantan during the period of Jan -Oct 2019.	<p>1.) In Jan - Dec '19, Mewah sourced CPO from 2 palm oil mills of QL Resources Bhd.</p> <p>2.) 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 North Kalimantan.</p> <p>3.) Mewah initiated sustainability engagement with QL Resources Bhd and PT PMI. The company acknowledged that land clearance activity at "regeneration scrubs" area was unintentionally. As illustrated by the spokesperson of PT PMI, the company was having a misunderstanding towards the definition of No-Deforestation and it wasn't aware that "regeneration-scrub areas" is also classified as High Carbon Stock (HCS) area. The 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 land clearance.</p> <p>4.) On 18 Feb 2020, QL Resources Bhd issued a group-wide "stop-work" order/ moratorium on the land clearing and peat land development. All planting activities in the non-compliant development sites have been halted 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 land development.</p> <p>5.) On top of the moratorium, QL affirmed its commitment towards NDPE compliance and it commits to stay align with the present industry's expectation.</p> <p>6.) Mewah will continue to assess the sustainability progress of the company closely.</p>	On-going monitoring/ verification
3	09-Apr-20	TH Plantation Bhd	Yes, supply from TH Plantation Bhd's Malaysia-based subsidiaries.	Chain Reaction Report, entitled " <i>Tabung Haji Plantations to Develop Once Oil Palm Concession, Once Again Breaching Buyers' NDPE Commitments</i> "	New land development in concession Deru Semangat Sdn. Bhd., at Pahang, Malaysia without HCS assessment.	<p>1.) TH Plantation Bhd ("THP") has been a long-term and loyal CPO supplier to Mewah Group.</p> <p>2.) Reference is made to our engagement with THP, the alleged concession, Deru Semangat Sdn. Bhd. ("DSSB"), is a joint venture company between Lembaga Tabung Haji and the Pahang Royal Family. In 2015, THP had entered into a Management Agreement with DSSB to manage their oil palm plantation of approximately 30,000 acres in Jerantut, Pahang.</p> <p>3.) 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.</p> <p>4.) 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 commitments. THP has decided to terminate in totality the Management Agreement with DSSB in year 2019. Finalized agreement and hand-over process will be executed in May 2020.</p> <p>5.) THP's management has stated their commitments towards NDPE in THP Sustainability Policy, with effective date on 27 Feb 2019.</p> <p>6.) Mewah will continue assess the situation more closely and changes so as to constantly assessing potential sustainability risk level in THP.</p>	On-going monitoring/ verification
4	04-Mar-20	Agusan Plantations Inc	Yes, supply from Agumil Plantation Inc.	Coalition against Land Grabbing (CALG), Forest People Programme (FPP)	Land grabbing & land conflict, precarious workers' conditions, environmental impacts of expansion as well as disputed land tenure of indigenous people & local communities financing of operations.	<p>1.) In Jan - Dec '19, Mewah sourced CPO from Agumil Plantation Inc (API) at one of our refinery, Mewah Datu Sdn. Bhd.</p> <p>2.) On 28 Feb, two social NGOs i.e. CALG Palawan, Forest People Programme raised a sustainability grievance on API through writing to Mewah.</p> <p>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.</p> <p>4.) As at date of publication of this grievance log, we are still engaging with API for a constructive response.</p>	Suspended

5	04-Mar-20	Pinehill Pacific Bhd	Yes, supply from Pinehill Plantation (M) Sdn. Bhd.'s Malaysia-based subsidiary	Mighty Earth (RRR# 18)	Deforestation of 21 ha at PT Makmur Jaya Malindo concession during the period of May July 2019.	<p>1.) In Jan – Dec'19, Mewah sourced CPO directly and CPKO indirectly from Pinehill Pacific, located in Teluk Intan, Perak, via Mewah-Oils Sdn. Bhd.</p> <p>2.) 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, Pinehill Pacific Bhd has divested their Indonesia operations and it had no longer management control over PT MJM.</p> <p>3.) 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.</p>	Suspended
6	08-Jan-20	NPC Resources	Yes, indirect supply from IOI's Malaysia-based subsidiaries.	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.	<p>1.) In Jan – Dec'2019, Mewah sourced CPKO indirectly from NPC Resources from IOI Edible Oils (Sandakan).</p> <p>2.) Mewah immediately reached out IOI to seek for clarification on the alleged deforestation at PT Sumber Alam Selaras (PT SAS).</p> <p>3.) Reference is made to IOI's response on 20th Jan 2020:</p> <p>a.) 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.</p> <p>b.) It was confirmed by Aidenvironment that, it was the fire that caused the land use change and not "deforestation".</p> <p>c.) 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.</p> <p>d.) 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.</p> <p>e.) 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.</p> <p>4.) 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".</p> <p>5.) As at date of publication of this report, no further evidence is presented to support this allegation.</p>	On-going monitoring/ verification
7	08-Jan-20	Borneo Pacific Group	Yes, supply from Golden Elate Palm Oil Mill, a Malaysia-based subsidiary of Borneo Pacific Group.	Mighty Earth (RRR# 23)	Alleged deforestation of 70ha at PT Arjuna Utama Sawit concession during Sept-Dec 2019.	<p>1.) 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.</p> <p>2.) Mewah has reached out Borneo Pacific Group immediately since 15th Jan 2020.</p> <p>3.) Through our engagement with Borneo Pacific Group, the Group responded that the alleged concession PT Arjuna Utama Sawit is neither a related company/subsidiaries of Golden Elate nor Borneo Pacific Group.</p> <p>4.) As at date of publication of this log, there is no further evidence presented to support this allegation.</p>	On-going monitoring/ verification

8	06-Dec-19	Goodhope Holding	Yes, supply from Premium Vegetable Oils (Kernel Crushing Plant), a Malaysia-based subsidiary of Goodhope.	Mighty Earth (RRR# 22)	Deforestation at PT Rim Capital, a subsidiary of Goodhope during the period 11th September 2nd November 2019.	<p>1.) In Jan – Jun'19, Mewah sourced CPKO directly from one of the subsidiaries under Goodhope in Peninsular Malaysia, namely Premium Vegetable Oils.</p> <p>2.) Through 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:</p> <p>a.) Map analysis confirmed that one of the land clearance areas (-2.661, 112.231) is located outside of the concession.</p> <p>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 lands due to peat soil. Goodhope has committed to NDPE policy since May 2017.</p> <p>c.) PT RIM Capital has not conducted any land clearance since 2012. There is no plan for new plantings at PT RIM Capital.</p> <p>3.) PT 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. Based on observations, the team found out that the alleged land clearing locations were areas burnt by landfires in September 2019 (see attachment Minutes of Field Verification Report).</p> <p>4.) It is concluded that the alleged land clearing occurred as a result of landfires on community-owned areas on 20th 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 (see attachment Minutes of Fires Report). The report highlighted the chronology of fire incidents occurring on 20th September 2019. It clearly stated that the fires were not committed by the company. All fire incidents originated from burnt land or forests belong to local community that are located close to the area of PT. Rim Capital. The local authority acknowledged the report and recognized the company's efforts to take immediate measures to extinguish and contain the fires.</p> <p>5.) On 6 Mar 2020, Goodhope presented a Progress Report on the fire prevention and forest rehabilitation program at PT Rim Capital. Education and awareness on fire prevention and mitigation are provided to the land owner and local community.</p> <p>6.) On 16 Mar 2020, Goodhope has submitted its latest version of concession map to Mighty Earth and RSPO ACOP for review and documentation. Meanwhile, the supplier has been working with the local community and stakeholders to rehabilitate and restore the community-owned fire-affected land.</p>	On-going monitoring/ verification
9	09-Nov-19	Global Enterprise Sdn Bhd	Yes, indirect supply from IOI's Malaysia-based subsidiaries.	Mighty Earth (RRR# 21)	Deforestation and/or peat development at PT Bulungan Surya Mas Pratama - during Jan-Oct 19	<p>1.) In Jan – Jun'19, Mewah sourced CPKO directly from IOI Edible Oils Sandakan (kernel crushing plant) to our refineries.</p> <p>2.) We engaged with IOI to seek for clarification on the alleged deforestation. An internal investigation has been conducted through desktop analysis and ground truthing.</p> <p>3.) Respond from our direct supplier, "<i>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.</i>"</p> <p>4.) As of the date of filing this grievance, we are still awaiting official statements/evidence from Global Enterprise as a proof to substantiate its statement.</p>	On-going verification/ monitoring
10	10-Sep-19	Sime Darby Plantation Bhd	Yes, supply from Sime Darby's Malaysia-based subsidiaries	Mighty Earth (RRR# 19)	Deforestation at Derawan (SOU 33) concession in Sarawak during Feb - Aug 2019	<p>1.) In Jan – Jun'19, Mewah sourced CPO and CPKO directly from Sime Darby palm oil mills and kernel crushing plant to our refineries.</p> <p>2.) 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.</p> <p>3.) It is confirmed that the clearing activities does not locate within its concession boundary and is 100 meters away. The clearing activities are carried out by a local company for durian orchard and some oil palm plantation.</p> <p>4.) No further evidence is presented to support this allegation.</p>	On-going verification/ monitoring

11	09-Dec-19	Tradewinds Plantation Berhad	Yes, supply from Tradewinds' Malaysia-based subsidiaries.	Mighty Earth (RRR# 17)	CB Industrial Product Holding / Jhonlin Group - Deforestation at PT Kurun Sumber Rezeki 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 Tradewinds is reported to own 70% shares)	<p>1.) 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%).</p> <p>2.) CBIP was reportedly owns 2 JV with Tradewinds i.e., Solar Green Sdn Bhd and Kris Jati Sdn Bhd.</p> <p>3.) In Jan-Jun'19, Mewah sourced CPO from three Tradewinds' palm oil mills located in Peninsular Malaysia and Sabah.</p> <p>4.) The respond from Tradewind to Mewah on 2 Aug-19, confirming that, " 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 KKJ is not part of the same group as CBIP. "</p> <p>5.) No further evidence is presented to substantiate the linkage between Tradewinds or Kumpulan Kris Jati with PT Kurun Sumber Rezeki.</p>	On-going verification/ monitoring
12	12-Aug-19	Tradewinds Plantation Berhad	Yes, supply from Tradewinds' Malaysia-based subsidiaries.	Mighty Earth (RRR# 18)	Deforestation at Trans Kenyalang Sdn. Bhd. concession in Sarawak since Nov 2018 - July 2019	<p>1.) In RRR18, it highlighted that Trans Kenyalang Sdn. Bhd. is a subsidiary (85%) of Amalan Penaga (M) Sdn. Bhd., which is wholly owned by Tradewinds Plantations Bhd.</p> <p>2.) Trans Kenyalang Sdn. Bhd. is alleged for deforestation of 94 ha peat forest since Nov'18 to Jul'19 (GPS Coordinate: 1.361, 111.465).</p> <p>3.) In Jan-Jun'19, Mewah sourced CPO from three Tradewinds' palm oil mills located in Peninsular Malaysia and Sabah.</p> <p>4.) With reference to Tradewinds' response, based on a Land Use Change Analysis (LUCA), the alleged land clearance activities do not fall in Trans Kenyalang's boundary.</p>	On-going verification/ monitoring
13	12-Apr-19	Genting Plantation Bhd	Yes, supply from Genting's Peninsular Malaysia-based subsidiaries.	Mighty Earth (RRR # 14 & 15)	Deforestation at PT Citra Sawit Cemerlang & PT Permata Sawit Mandiri concession in West Kalimantan since Jan'19 - May'19.	<p>1.) Genting's Ayer Itam Palm Oil Mill is one of CPO suppliers to Mewah Group.</p> <p>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.</p> <p>3.) CPO produced in PT Citra Sawit Cemerlang (PT CSC) & PT Permata Sawit Mandiri (PT PSM) DO NOT TAKE PLACE in Mewah's supply chain.</p> <p>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.</p> <p>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 order on new land clearing has been put in place.</p> <p>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".</p> <p>7.) Reference is made to Genting's letter dated on 6th Sept 19, the HCS report for PT CSC has been submitted 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.</p> <p>8.) No further update from Genting Plantation since Sept'2019.</p>	Ongoing verification/ monitoring.
14	13-Apr-19	Kwantas	Yes, supply from Kwantas's Sabah-based subsidiaries	Mighty Earth (RRR # 14)	Deforestation at Kwantas Pelita Plantation (Balingan) Sdn Bhd concession in Sarawak in Feb-Mar'19.	<p>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.</p> <p>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.</p> <p>3.) As at date of publication of this log, there is no further evidence presented to support this allegation.</p>	On-going verification/ monitoring.

15	11-Mar-19	Double Dynasty - Radiant Lagoon Sdn. Bhd.	Yes, indirect supply from Double Dynasty subsidiary - DD Palm Oil Mill, Sarawak through CPKO purchase from third-party supplier.	Mighty Earth (RRR# 13); Bruno Manser Fund	Land conflict and deforestation at Radian Lagoon Sdn. Bhd. concession in Sarawak in Dec 18 - Jan 19.	<p>1.) In year 2018, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils through Socship and Fimachem bulking installation.</p> <p>2.) Reference to Wilmar's sustainability dashboard, DD Palm Oil Mill came into Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils.</p> <p>3.) Mewah has immediately reached out to our direct contractual supplier for supply chain verification. The engagement with our direct supplier is still in progress.</p> <p>4.) Prior to the publication of Mighty Earth Rapid Respond Report 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.</p> <p>5.) Through an email dated 25 Mar 19, Wilmar is in the pipeline of investigating the allegation of "<i>land conflict and deforestation at Radiant Lagoon</i>" and confirming whether the moratorium of land clearing is in place. Meanwhile, field visit/ supply chain verification assessment will be carried out by Wilmar's team from 25 Mar'19 onwards.</p> <p>6.) A meeting was further held with DD POM on 29 April'19 to share the outcome from field visitation and expectation from Wilmar on DD POM in complying to the NDPE policy and re-entry criteria. Wilmar has committed to support and provide guidance to DD POM in developing action plan in addressing the issues identified in the field visit.</p>	Suspended
16	28-Nov-18	Felda/ FGV	Yes, supply from FGV's Malaysia-based subsidiaries.	Coalition of NGOs (Rainforest Action Network ("RAN"), International Labor Rights Forum, SumOfUs)	<p>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.</p> <p>2.) Re-suspension of RSPO P&C certification for Serting Palm Oil Mill and all its uncertified units.</p>	<p>2.) On 30th Nov 2018, FGV has made a public statement in respect of the findings of the RSPO Complaints Panel (CP).</p> <p>3.) On 4th Dec-2018, Mewah has reached out to FGV's Sustainability team. FGV has stressed its commitment to restore and rebuild best social practices in all FGV-owned plantations that includes:</p> <ul style="list-style-type: none"> a) To freeze all new recruitment of workers from external contractors across its operations, with immediate effect. b) To review employment policies on the benefits enjoyed by its plantation workers and will absorb the costs of basic necessities, including food supplies given to its workers. c) To review where necessary revising, all communication materials and training programmes for workers, especially with regard to their terms of employment, whistle-blower protection and health & safety procedures. d) To engage with a responsible independent third party to train its workers on its human rights policy. e) To adhere strictly on national policies and all applicable standards on parity of employment for workers including remuneration and benefits in kind. f) To continue its commitment towards RSPO P&C certification. <p>4.) As at Jan-2019, we do not enforce ban/ exclusion for the CPO supply from Serting Palm Oil Mill. The decision was made judging at the fact where FGV is displaying very positive attitude to collaborate with RSPO to rectify its sustainability/operations deficiencies. FGV is showing good progress in achieving the expectation within the specific timeframe that set by RSPO Complaint Panel.</p> <p>5.) As at Mar-2019, the chairman of RSPO Complaint Panel, Dato'Henri Barlow has granted the request of three weeks extension of Action Plan by FGV from date 8 Mar 2019. In other words, FGV will submit its action plan to RSPO Complaint Panel by 29 Mar 2019.</p> <p>6.) In terms of FGV's RSPO recertification plan, the recertification has been in progress since year 2017. FGV targets to recertify all its palm oil mills for RSPO P&C by year 2021. As of Mar-2019, FGV has its 27 palm oil mills recertified for RSPO.</p> <p>7.) 24 Jun 19 – A petition submitted by Grant & Eisenhofer ESG Institute to the US Customs and Border Protection (CBP) on "forced labour & illegal child labor practice due to widespread evidence".</p> <p>8.) 26 Jun 19 – FGV issued a statement in response to the Petition by ESG Institute to emphasize that all issues raised in the petition have been the subject of public discourse since 2015 and the Company has taken several steps to correct the situation.</p> <p>9.) 5 Aug 19 – RSPO lifted the suspension of RSPO certification of FGV's Serting Palm Oil Mill and 4 of its oil palm plantations.</p> <p>10.) 15 Aug 19 – Three (3) US-based NGOs namely, International Labour Rights Forum (IRLF), Rainforest Action Network (RAN) and SumOfUs filed a formal complaint with the US Customs and Border Protection (CBP), to deny entry of FGV products made with forced labor.</p> <p>11.) 19 Aug 19 – FGV responded to the petition via a public statement. For more information, please visit: http://www.fgvholdings.com/fgvs-response-to-the-petition-by-a-coalition-of-ngos-submitted-to-the-united-states-customs-and-border-protection/</p> <p>12.) 22 Aug 19 - Mewah engaged with FGV's team to further understand their progress:</p> <ul style="list-style-type: none"> a) Since the RSPO suspension came on December 2018, FGV has introduced a total 18 new initiatives at its worldwide plantation operations that aim to correct any potential wrongful recruitment procedures and labour practices. b) The Company has been working hard to seek restoration to RSPO certification. It has undertaken comprehensive assessment to identify gaps and to implement stringent recruitment guidelines and labour policies in its worldwide plantation operations. c) At present, the Board of FGV has completely changed from the Board that was in place in 2015 as well as its Senior Management team. The new FGV Management Team has so far display decent cooperation and willingness to engage. Furthermore, the public should be able to observed that FGV has been showing consistent achievement its pre-set milestones and work in accordance to time-bound action plan. Hence, it is unfair. 	Ongoing verification/ monitoring.

						<p>d) Whilst the Company acknowledged some allegations filed in the petitions are true, most of the allegations have been corrected and verified by independent third-party includes the RSPO Complaint Panel.</p> <p>13.) 13th Jan 2020, RSPO Complaint Panel re-suspended the Principles and Criteria (P&C) process for FGV's Serting Palm Oil Mill and all its uncertified units.</p> <p>14.) On 21st Jan 2020, Mewah and FGV hosted engagement meeting at FGV's office. The objective is to address sustainability concerns and to assess potential sustainability risk level in FGV/Mewah supply chain. FGV had demonstrated all its action plans and activities that has so far put in place to pursue the RE-suspension notice.</p> <p>15.) As at 7 Feb 2020 - FGV is proactively engaging with RSPO Complaint Panel and is currently awaiting further respond from RSPO Complaint Panel. We take note that FGV must now demonstrate stronger commitment towards a higher transparency level in its supply chain.</p> <p>16.) Mewah will assess the situation more closely and changes so as to constantly assessing potential sustainability risk level in FGV supply chain.</p>	
17	24-Sep-18	Rimbunan Hijau/Jasa Tiasa	Yes, indirect supply from Rimbunan Hijau and Jasa Tiasa through CPKO purchase from third-party supplier	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.	<p>1.) Eastern Eden Estate (EEE) is an oil palm plantation that owned and operated by Jaya Tiasa, a subsidiary company of Rimbunan Hijau Group.</p> <p>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.</p> <p>3.) On Jan-2019, Jasa 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 occurred within EEE's concession. Jaya Tiasa has shared their groupwide concession map with Wilmar for on-going monitoring.</p>	On-going verification/ monitoring
18	17-Aug-18	Goodhope Holding	Yes, supply from Premium Vegetable Oils (Kernel Crushing Plant), a Malaysia-based subsidiary of Goodhope.	Greenpeace (Final Countdown report)	Deforestation, development without Environmental Impact Assessment and failure to comply to proper FPIC process at its concession PT Nabire Baru, in Nabire, Papua.	<p>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.</p> <p>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.</p>	Closed
19	14-Jul-18	BLD Plantation Bhd	Yes, indirect supply from BLD Plantation subsidiary - Kirana Palm Oil Refinery, Sarawak through CPKO purchase from third-party supplier.	Mighty Earth (RRR# 4,5,6,7 & 11)	Deforestation at BLD Plantation Bhd concession in Sarawak since Mar - Dec 2018.	<p>1.) In July 2018, Mewah received CPKO supply from BLD Plantations - Kirana Palm Oil Refinery Sdn Bhd, Sarawak through Butterworth bulking installation.</p> <p>2.) Mewah has immediately reached out to our direct contractual supplier for supply chain verification. The engagement with our direct supplier is still in progress.</p> <p>3.) Mewah decided to temporarily stop sourcing from the supplier until and unless the company shows positive progress to resolve the ambiguity.</p> <p>4.) 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.</p>	On-going verification/ monitoring/ Suspended

20	24-May-18	TH Plantation Bhd	Yes, supply from TH Plantation Bhd's Malaysia-based subsidiaries.	Mighty Earth	Deforestation at its PT Persada Kencana Prima (North Kalimantan), Hydroflow Sdn Bhd plantations in Sarawak and Ladang Tabung Haji in Sarawak.	<p>1.) 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.</p> <p>2.) Mewah has completed supply chain assessment to Bukit Lawiang Palm Oil Mill including, FFB traceability assessment, and social-environmental impact assessment. The outcome was satisfactory.</p> <p>3.) 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 not take place in Mewah's supply chain.</p> <p>4.) Through an email between Mewah and TH Plantations on 29th Mar 2019, TH Plantations has completely ceased all development in PT Persada Kencana Prima (PT PKP) since mid-2018. No land clearing activities and no planting on the cleared land have been carried out since then.</p> <p>5.) Any sign of land clearing in PT PKP are the work of IPK permit holders who continue logging activities at TH Plantations concession. There are few IPK concessionaires who were given the license to log by local 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 to cease the logging activities.</p> <p>6.) Regarding the allegation on Hydroflow Sdn. Bhd., TH Plantations confirmed that the alleged concession is not within Hydroflow's boundaries and it belongs to neighboring estate. A stop work order on Hydroflow Sdn. Bhd. has been issued since September 2018. No heavy machineries have been placed within the estates and no funds have been channeled to Hydroflow Sdn. Bhd. for any further development.</p> <p>7.) On 27th May 2019, Mewah reached out to TH Plantations to seek for explanation for the allegation on Ladang Tabung Haji. The satellite image and land use maps are those of Ladang Sebauh and Ladang Semilajau, both 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. TH Plantations was the managing agent for these estates, however Tabung Haji had disposed the said estates to a third party in 2002.</p> <p>8.) As at date of publication of this report, no further evidence is presented to support this allegation.</p>	On-going verification/ monitoring
21	11-Apr-18	Tee's Family / Prosper Group	Yes, supply from Prosper's Malaysia-based subsidiaries.	Greenpeace; Chain Reaction	Tee Family Summary Report - Deforestation/ social exploitation in Bewani Oil Palm Plantation (PNG)	<p>1.) Aideenvironment 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/action plan (that suggested by Aideenvironment).</p> <p>2.) In year 2018, we received CPO from 8 Prosper's mills that base in Peninsular Malaysia. We completed supply chain verification program including FFB traceability and social-impact-assessment (SIA) at Prosper POM, Kosfarm POM, Wujud Wawasan POM, Sawira Makmur POM, Rompin POM, and Endau POM. The assessment outcomes were satisfactory.</p> <p>3.) Prosper Group explained there is no direct linkage between Bewani PNG and Prosper Malaysia, stating that Bewani is an investment by its minority shareholder with no commercial links to the Group.</p> <p>4.) The fact is established that the CPO/CPKO supplied from Prosper to Mewah are produced in Prosper's mills at Peninsular Malaysia. It is a forthright understanding that all Prosper's mills in Peninsular Malaysia have its FFB supplied from its own estates, dealers and smallholders that base in Peninsular Malaysia. In other words, CPO/CPKO originate from Prosper's Group in Papua New Guinea does not take place in Mewah's supply chain.</p> <p>5.) In Nov-2018, Mewah decided to stop sourcing PKO from Prosper due to the fact that the supplier has demonstrated little sustainability progress.</p> <p>6.) In Jan-2019, Mewah demanded a sustainability time-bound action plans. Since Jan-2019, Mewah has impose strict control and limit the purchase of palm products from Prosper. The business relationship between Mewah and Prosper will only be reviewed and resumed until and unless the all agreed action plans have been fulfilled.</p> <p>7.) In Feb-2019, Prosper wrote to inform that it has completed divestment of "Tee Family" from Bewani Oil Palm Project Management. The letter assured Prosper Group of Companies are no longer be associated with any PNG company or project in this connection. Tee Family/Prosper was requested to provide more solid evidence to prove it has no link with Top Leaf Holding Ltd.</p> <p>9.) On 5th April 19 – Tee Kim Tee issued a letter to publicly acknowledge the non-compliant for its PNG oil palm plantation investment, admit consequences and commit to undertake liability.</p> <p>10.) On 30th April 19,</p> <ul style="list-style-type: none"> i. Prosper launched a Sustainability website http://www.prosper.com.my/Sustainability-Sustainability-Initiatives.html ii. Prosper released a bilingual Sustainable Palm Oil Policy (which is later revised on 31 July 2019) iii. Prosper released a NDPE policy time-bound implementation plan iv. Prosper launched grievance procedure in its Sustainability dashboard <p>11.) On 12 June 19, Prosper has formally engaged with Earthworm Foundations (former TFT). With the engagement commitment, Earthworm will be supporting its NDPE policy implementation and developing a more tangible time-bound action plan.</p> <p>12.) On 23 October 19 - We officially announced released trade suspension for Kosfarm Palm Oil Mill. This is in view of significant sustainability progress made by Prosper Group since April-19.</p> <p>13.) Mewah commit to continue working closely with Prosper to progress in its sustainability journey.</p>	On-going verification/ monitoring/ Partially-suspended

22	21-Mar-18	Samling Group-Glenealy Plantations	Yes, supply from Samling's East Malaysia-based subsidiaries.	Greenpeace; Mighty Earty (RRR# 17); Mighty Earth (RRR# 24)	<p>1.) Gleanealy Plantations supply to Timora Palm Oil Mill (MDSB - 2017)</p> <p>2.) Exploitation and illegality: development without free, prior, and informed consent of affected communities and human rights violations in Myanmar Stark Prestige Plantation (MSPP) 5,700ha.</p> <p>3.) Deforestation in Kalimantan - PT Tunas Borneo Plantations (PT TBP) in North Kalimantan, 2,867ha forest was cleared within concession between 2015 and 2017.</p> <p>4.) Use of fire - apparent use of fire in land clearing process in Ome-Ome project in PNG.</p> <p>5.) Deforestation in LPF/ 0008 Marudi & Batu Belah concession by Sampling Reforestation (Bintulu) Sdn Bhd in Jan 2019 - Feb 2020.</p>	<p>1.) Mewah get supply of CPO from Samling Group Malaysia-based subsidiaries - Timora Palm Oil Mill at Lahad Datu, Sabah.</p> <p>2.) We have 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.</p> <p>3.) It is important to take note that Mewah only receive CPO from Timora Palm Oil mills that located at East Malaysia. We do not accept CPO from Samling Group/ Glenealy Plantation that origin from Indonesia or Sarawak Malaysia. Having said that, CPO originated from Samling's Indonesia and Sarawak's concession do not take place in Mewah's supply chain.</p> <p>4.) As of May 2018, Samling has issued a moratorium on land clearings in their Indonesia, Myanmar and Malaysia operations. In addition, Samling has divested from its PNG operations.</p> <p>5.) On 2 April 2019, Mewah reached out to Samling Group to demand for clarification on deforestation allegation in Marudi & Batu Belah.</p> <p>6.) Through an email between Mewah and Samling Group on 3rd May 2019, it is confirmed that there is no any oil palm plantation development in the identified area the report. The area and activities conducted are related to the Licensed Planted Forest (LPF) under Samling Group.</p> <p>7.) A latest respond from Samling Group in Feb 2020 says that, Marudi LPF is a reforestation area and there will be no oil palm planted at this area. Samling Forestry's Unit is required to plant LPF 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.</p> <p>8.) As at todote, Mewah has informed it suppliers that Samling should not be included in our supply chain until and unless these grievances are cleared/ resolved.</p>	Closed/Ongoing Monitoring/ Suspended
23	11-Oct-17	Felda/ FGV	Yes, supply from FGV's Malaysia-based subsidiaries.	Mighty Earth; Greenpeace	<p>A. PT Citra Niaga Perkasa, Landak Regency, West Kalimantan Province, Indonesia</p> <p>i.) FGV bought the Company in year 2012 for USD 10.60 million.</p> <p>ii.) The Company is RSPO certified since year 2012.</p> <p>iii.) Allegation on Deforestation & Peatland development – the Company is alleged to clear a 240 hectares HCV forest on deep peatland that greater than 3 metres (> 3m).</p> <p>B. PT Temila Agro Abadi, District of Landak and Village of Kuala Mandor, West Kalimantan Province, Indonesia.</p> <p>i.) FGV bought the Company in year 2013 for USD 4.2 million.</p> <p>ii.) The Company is RSPO certified since year 2014.</p> <p>iii.) Allegation on Deforestation & Peatland development – the Company is alleged to clear a total 1,888 hectares of HCV forest and peatland.</p>	<p>1.) 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 CPO 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.</p> <p>2.) On 16 May 2017, Mewah has reached out to FGV on allegations of HCV clearance in their Indonesian subsidiary, PT TAA. Felda is appointing a third-party assessor to verify the allegations.</p> <p>3.) On 31 August 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.</p> <p>4.) On 12 Jan 2018, FGV has updated on their "Kalimantan Peat Restoration Master Plan". FGV 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.</p> <p>5.) FGV is engaging various stakeholders 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 ensure timely execution.</p> <p>6.) At 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.</p> <p>7.) On 11th October 2019, Mighty Earth highlighted FGV's PT CNP in the Rapid Response Report 20.</p> <p>8.) Reference is made to our email conversation with FGV on 21st Oct 2019, the alleged deforestation area belongs to the local community who did not give consent to FGV for land development even though the land is within FGV's "Izin Lokasi" boundary.</p> <p>9.) It is understood that the land clearing activities started since Jun'19 for paddy planting purpose.</p> <p>10.) Both PT CNP and PT TAA operation in FGV Kalimantan involve only maintenance of road, drains and boundary trenches and water table.</p>	Ongoing verification/ monitoring.