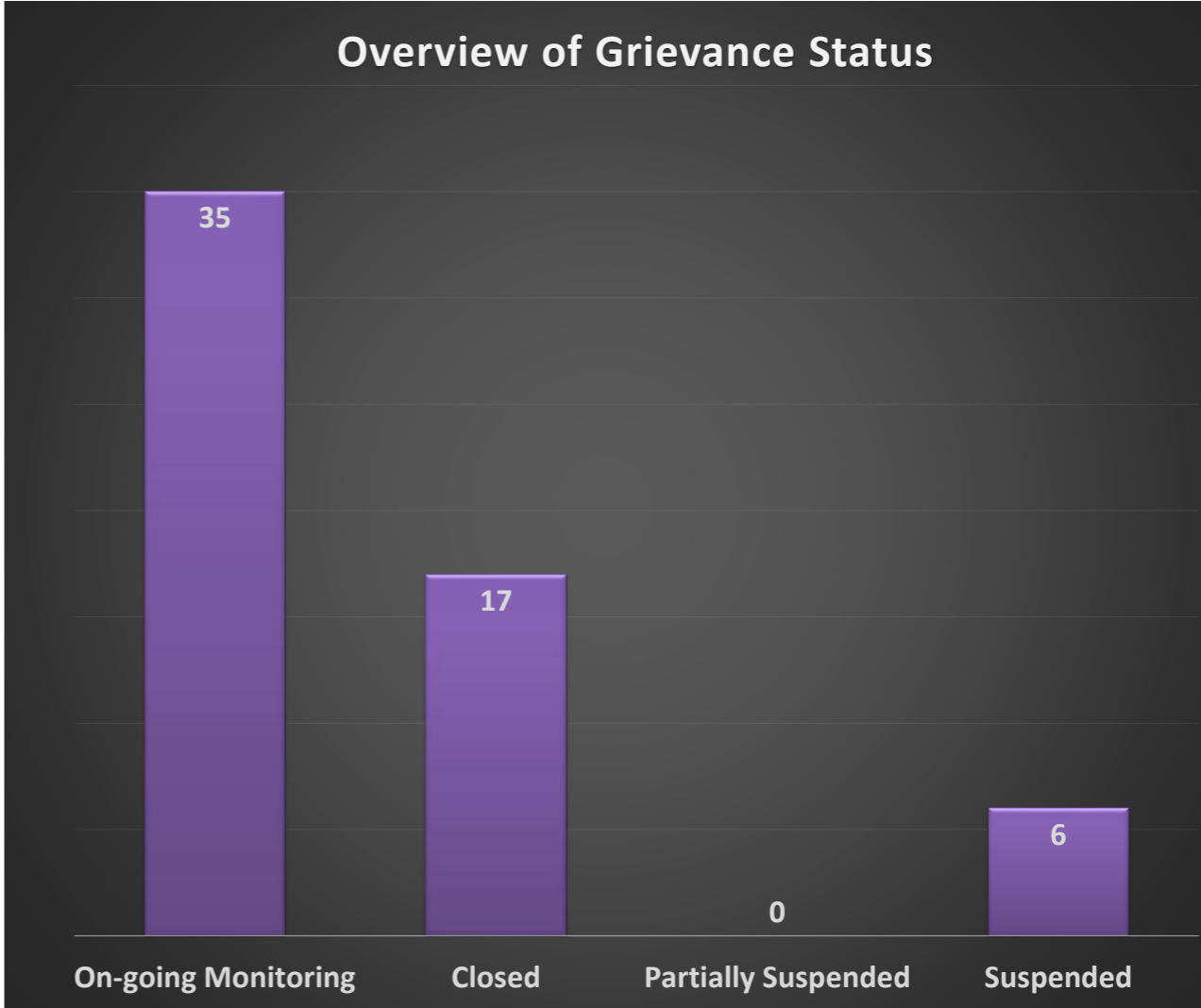
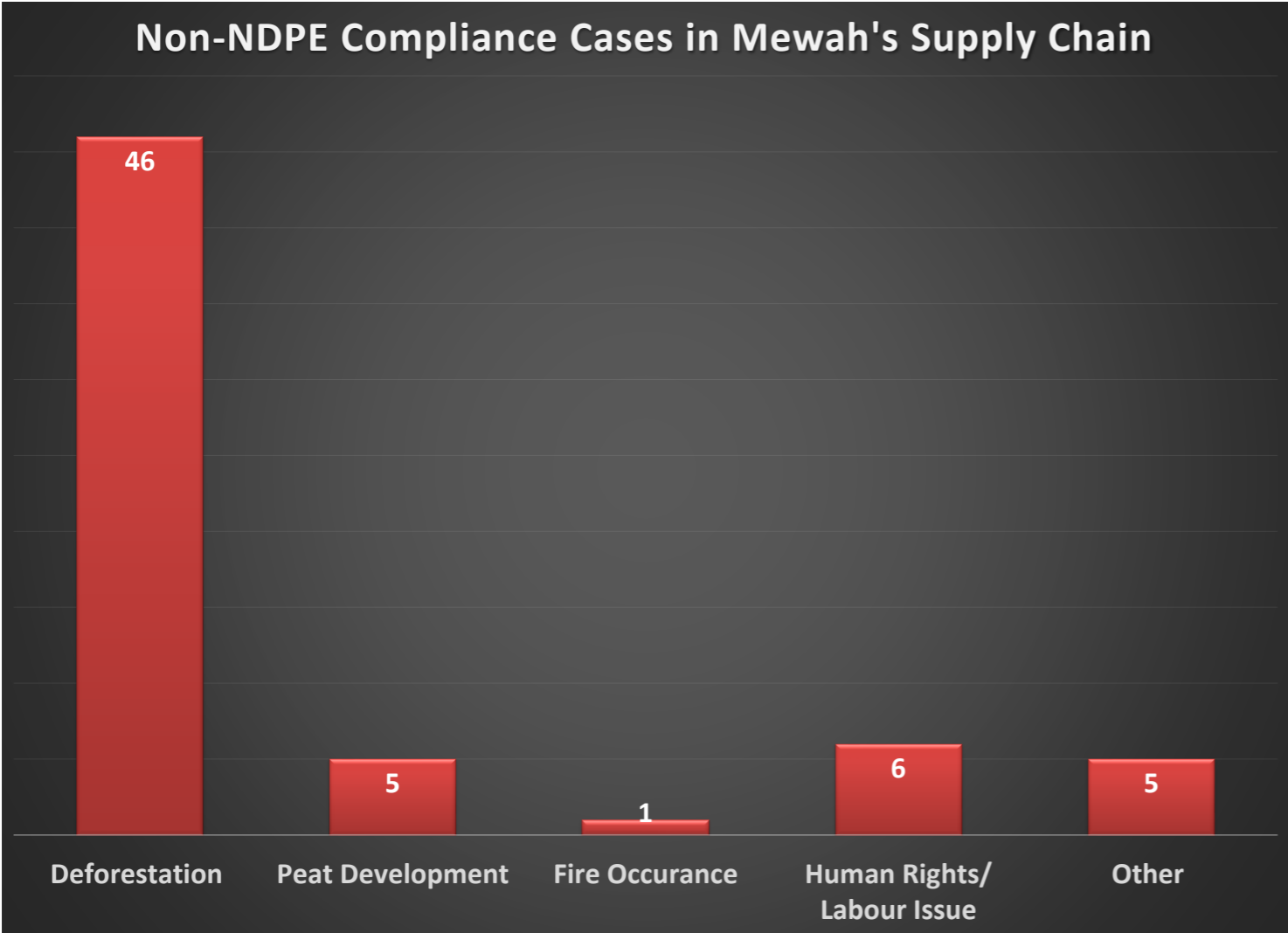


**Mewah Group Sustainability Grievance Log (Update as at July 2024)**



No.	Target of Grievance/ Company	Subject Grievance	Category	To-date action taken by Mewah	Status
1	Perbadanan Islam Johor (PIJ) Plantations	Deforestation within the PIJ Plantation and Agriculture SB, Ladang Nilam concession, from June 2019 to February 2020, covering a total area of 239 hectares.	Deforestation	<p>1. In March 2024, we received a grievance report from Mighty Earth (Report 43) requesting an investigation into PIJ Plantations. The Company have been alleged to have engaged in deforestation activities in one of their estates, Ladang Nilam concession, from June 2019 to February 2020.</p> <p>2. Satellite imagery has determined the total deforested area to be around 239 hectares.</p> <p>3. Our investigation revealed that PIJ Plantations operates around six oil palm plantations from Kluang to Kota Tinggi. However, we found no evidence of an MPOB license for the Ladang Nilam concession. Therefore, since the MPOB license for the Ladang Nilam SB concession remains elusive, the deforested plot may not eventually be used for oil palm cultivation.</p>	On-going monitoring/ verification
2	Sin Heng Chan (Malaya) Bhd, Urun Plantations	97 ha deforestation in the period of 2016 - 2023 at Kapit, Sarawak (Deforestation Locations: 3.06332284, 114.26949310, & 3.06320397, 114.25491250)	Deforestation	<p>1. The grievance was officially reported in an Earthqualizer report dated 8 August 2023. Deforestation allegations have been made against Urun Plantations, Sarawak, regarding potential deforestation activities in Kapit, Sarawak, during the span of 2016 to 2023.</p> <p>2. An active investigation is presently underway between Mewah, SOPB and Urun Plantations to substantiate the validity of this grievance and to assess the eligibility of the reported grievance.</p> <p>3. On 23 April-24, SOPB informed that</p> <p>a.) Latest meeting engagement with UPSB personnel on 28 March-24 at Bintulu.</p> <p>b.) SOPB shared with UPSB :</p> <ul style="list-style-type: none"> <li>- Land Use Change Analysis from periods 2020 to 2023</li> <li>- Summary of HCV Assessment Review</li> </ul> <p>c.) SOPB requested UPSB to provide the following :</p> <ul style="list-style-type: none"> <li>- Maps of UPSB's planted areas</li> <li>- Maps of the set aside 650ha resettlement area</li> </ul> <p>d.) Urun Plantations Sdn Bhd is also to provide the following:</p> <ul style="list-style-type: none"> <li>- Urun Plantations Sdn Bhd "No Deforestation, No New Development on Peat, No Exploitation" (NDPE) Policy/Commitment to share publicly</li> <li>- "Stop Work Order" (SWO), an order by the company to stop any new land clearing to facilitate the NDPE Policy/Commitment</li> </ul>	On-going monitoring/ verification
3	PT Erasakti Wiraforestama	An investigative TV channel shows footage of two young girls of 13 and 15 years old carrying out chemical weeding in plantations.	Human Rights/ Labour Issue	<p>1. In 2022, Mewah sourced CPKO indirectly from PT Erasakti Wiraforestama.</p> <p>2. Based on the on-the-ground investigation from the Department of Manpower and Transmigration Jambi Province, Indonesia, on 7 November 2022, the allegations are deemed to be untrue, as there is no evidence of child labor in the plantation.</p> <p>3. We would like to emphasize that Child Labour is a critical matter, and we have zero tolerance for Child and Forced Labour in our operations and supply chain.</p>	Closed
4	PT Teguhkarsa Wanalestari	Approximate 340ha (indicative HCS) was cleared in PT Sawit Sukses Sejati (affiliate relationship to PT Teguhkarsa Wanalestari).	Deforestation	<p>1. Investigation is currently on-going:</p> <p>a.) To verify group-level ownership of PT Sawit Sukses Sejati</p> <p>b.) To verify the "affiliate relationship" between PT Sawit Sukses Sejati and PT Teguhkarsa Wanalestari.</p> <p>c.) To seek PT Teguhkarsa Wanalestari to issue immediate stop-work-order on the clearance location: 1.037677, 99.036329, at Mandailing Natal Regency, North Sumatra.</p>	On-going monitoring/ verification
5	Jernih Kemboja POM	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.	Deforestation	<p>1. 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.</p> <p>2. Mewahoelo Industried Sdn Bhd (a subsidiary of Mewah) sourced CPO INDIRECTLY, through string contract from third-party supplier in year 2021.</p> <p>3. On 17 Feb-22 - Mewah initiated engagement with AA Sawit and Jernih Kemboja POM pertaining the allegations.</p> <p>4. On 10 Jun-22 - Jernih Kemboja responded to Mewah on its progress:</p> <p>a.) Implementation &amp; enforcement of Jernih Kemboja's Group Sustainability Policy</p> <p>b.) A management commitment letter that addressed (i.) implementation of stop-work-order; (ii.) Seek review from independent third-parties on all new development areas to ascertain potential liability; (iii.) Commitment to support on suitable recovery project guided by recommendation from independent third-parties.</p> <p>c.) Implementation &amp; enforcement of Mados's Sustainability Policy</p> <p>5. On 1 Dec-22, Jernih Kemboja informed that-</p> <p>i.) a third-party consultant- Wild Asia has been working with the senior management of Mados's Management Group (MMG) to understand the causes and identify ways to ensure that NDPE compliance will be possible for this group of companies. A LUCA was conducted through an independent consultant, and a total of net liability areas of approximately 18,147ha was identified.</p> <p>ii.) A "recovery project" (RP) was conceptualized that has been designed with the RSPO principles for compensation projects in mind. The RP sets out a 20-year commitment and potentially exceed 50,000 ha.</p> <p>iii.) Consultation process is currently in progress before finalising the Recovery Plan by end of 2022.</p> <p>6. On or around April 2023, the RSPO Complaints Panel has dismissed the Complaints filed by Mr Phil Aikman, Mighty Earth Inc against Mado's Holding Sdn Bhd, on the ground of dismissal that the respondents does not have controlling interest over Ibzi Holdings and its subsidiaries. Thus, it is not subjected to the RSPO requirement as it is not an RSPO member. In addition, RSPO has confirmed that there is no new land clearing conducted within the estate managed by Mado's Holding Sdn Bhd, with the exception of Mersing Estate. All others estates owned has been verified by RSPO secretarial and RaCP is not required since there was no liability as the areas had been cleared and planted with oil palm prior to November 2005. For Mersing Estate, RSPO confirmed LUCA assessment has been passed and the final conservation liability is 0 ha.</p> <p>7. On 20th December 2023, Mewah had officially lifted the trade suspension of Jernih Kemboja. The company has met all the requirement stipulated in Mewah's supply chain reentry criteria.</p>	On-going verification/ verification

6	Sg Terah Palm Oil Mill	A total of 97.2ha of deforestation occurred on the western border of the Lebir Estate concession.	Deforestation	<p>1.) Sg. Terah Palm Oil Mill is a private entity register under Agropalm Sdn Bhd.</p> <p>2.) 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.</p> <p>3.) Based on the engagement with Estate Manager of JFL Holdings (Parent company of Lebir estate):</p> <p>(A). The deforestation detected is not within the concession areas of Lebir estate and they have no plan to further expand their current operation.</p> <p>(B). The Lebir Estate is a MSPO certified estate since the year of 2019, where their planting was completed in the year of 2015.</p> <p>(C). Since March 2019, a total of 93ha of logging licensed under Komplek Perakayan Kelantan Sdn Bhd was permitted. Komplek Perakayan Kelantan Sdn Bhd is a subsidiary company registered under state owned Kelantan State Economic Development Corporation.</p> <p>4.) 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.</p>	Closed
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7	Syarikat Cahaya Muda Perak Sdn Bhd	4ha of deforestation between 16 to 31 May 2021, and 6ha of deforestation between Jan to 30 Sep 2021	Deforestation	<p>1.) Syarikat Cahaya Muda Perak (Oil Mill) Sdn Bhd is one of the regular suppliers to Mewah-Oils Sdn Bhd.</p> <p>2.) We initiated engagement with Syarikat Cahaya Muda Perak (Oil Mill) Sdn Bhd on 17th December pertaining the allegation. Ground verification was carried out on 23rd December. The responses are as follow-</p> <p>(A.) Syarikat Cahaya Muda Perak (Oil Mill) Sdn Bhd stated that the alleged deforestations were occurred outside of their concession. The boundary of their concession which demarcated using fence is at 4.165656, 101.289481. On ground verification has been carried out 23rd Decemeber 2021 to confirm the accuracy of the findings.</p> <p>(B.) The deforestation location provided in the report- 4.163607, 101.295295, is seemingly belong to a neighbouring smallholder. The plot was a mixed agricultural land since the 90's. Young fruit trees seedlings have seen planted on the neighbouring plots of Syarikat Cahaya Muda Perak (Oil Mill) Sdn Bhd.</p> <p>(C.) As such, the Mewah Sustainability Team together with the Mill Manager of Syarikat Cahaya Muda Perak (Oil Mill) Sdn Bhd who supported for grievance verification, jointly confirm that the deforestation activities detected are not for oil palm planting.</p> <p>3.) This grievance is ineligible as it falls beyond the scope of our present Sustainable Palm Oil policy/grievance mechanism.</p>	Closed
8	Sabah Land Development Board	Deforestation in Kawayoi Plantation: 3ha between 1st - 31st Aug'21 & Improper reimbursement to communities	Deforestation	<p>1.) Since Dec'20 to Aug'21, Mewah sourced CPO directly from Pandewan Palm Oil Mill for our refinery, Mewah Datu Sdn Bhd.</p> <p>2.) The engagement between Mewah and the Pandewan Palm Oil Mill initiated on 21-Sept. The responses as below:</p> <p>(A.) 3 ha deforestation in Kawayoi Plantation in August 2021</p> <p>i.) The 3ha deforestation area is encroached and felled in Kawayoi Plantation by a villager of Kg. Kawayoi in Aug 21.</p> <p>ii.) Kawayoi plantation in conjunction of AJK Pembangunan Geran Komunal Kg. Kawayoi-Inarad (Taskforce of Communal Title) has communicated through a written letter to the alleged villager to halt clearing. At the same time, Kawayoi plantation alerted Sabah Forestry Department of the same.</p> <p>iii.) Kawayoi Plantation assured its non-involvement in both illegal deforestation for oil palm development in the stated area.</p> <p>(B.) Allegation of unfair distribution of dividend:</p> <p>i.) In 2020, Kawayoi Plantation Sdn Bhd paid a total of RM500 as dividend, which was split into 2 payments i.e., 1st payment has been paid in June 2020 and 2nd payment has been paid Dec 2020. The proof of receipts by local communities for both payment period (Jun'20 &amp; Dec'20) are shared by Kawayoi Plantation to Mewah.</p> <p>ii.) Kawayoi Plantation is collaborative throughout the investigation process; further investigation will be judged base on case development.</p>	Closed
9	Rimbunan Hijau	Deforestation & Environmental Harms, Deforestation, Police violence, Worker health & Safety at PNG	Deforestation	<p>1.) In year 2020, Mewah imported CPKO from Gilford Limited, which is a subsidiary under Rimbunan Hijau (RH).</p> <p>2.) The engagement between Mewah and RH was initiated in late July-21. RH has been very cooperative and transparent during the engagement.</p> <p>3.) 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.</p>	Suspended
		614 ha Clearance prep/Stacking lines at LPF 0026 (Sarawak) in the period of Jun 20 - Apr 21	Deforestation	<p>1.) In year 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO).</p> <p>2.) Reference to Wilmar's sustainability dashboard, Rimbunan Hijau, entered Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils.</p> <p>3.) The engagement between Mewah and RH was initiated in early July-21.</p> <p>(i). 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.</p> <p>(ii). 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.</p>	Closed
10	East New Britain Resources Group	Deforestation, Corruption, Lack of free, prior, informed and consent (FPIC), Child Labor, Tax Evasion at PNG	Other	<p>1.) In year 2020, Mewah imported CPKO from Tzen Plantation Limited, which is a subsidiary under East New Britain (ENB).</p> <p>2.) The engagement between Mewah and ENB was initiated in late July-21. ENB has been very cooperative and transparent during the engagement.</p> <p>3.) Notwithstanding 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.</p>	Suspended

11	WTK Holdings	12ha deforestation at Medan Mestika Sdn Bhd in the period of Jan-Apr'21.	Deforestation	<p>1.) In year 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO).</p> <p>2.) Reference to Wilmar's sustainability dashboard, WTK Palm Oil Mill entered Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils.</p> <p>3.) Based on our investigation outcome, Medan Mestika Sdn Bhd is not legal owned by and related to WTK.</p>	Closed
12	Pure Green Development Sdn Bhd	58ha deforestation at Marang, Terengganu in the period of Jan-May'21	Deforestation	<p>1.) In year 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO).</p> <p>2.) Reference to Wilmar's sustainability dashboard, Tetangga Akrab POM 1 &amp; 2, that owned by Datuk Tan Thian Siang, entered Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils.</p> <p>3.) Based on our investigation, there is sufficient proof to show the relationship/ ownership between Datuk Tan Thian Siang with Tetangga Akrab POM 1&amp;2 and Pure Green Development. However, the alleged deforested land which was formerly a forest reserve was later turned into state own land, which is now own by the Royal Family of Terengganu state.</p>	On-going monitoring/ verification
13	Harn Len Corporation Berhad	16 ha deforestation at Harn Len Realty (Serian) Sdn Bhd (Serian, Sarawak) in the period of May'21	Deforestation	<p>1.) In year 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO).</p> <p>2.) Based 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 January 2020. Thereafter, the mill switched its ownership to Far East Holdings and renamed as Cenderawasih POM.</p> <p>3.) To this, 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 grievance.</p>	On-going monitoring/ verification
14	Tamaco Group	A total of 327ha deforestation detected in Semai Mekar Sdn Bhd, Bintulu in the period of 2016-April 2021 i. 322ha (2016-2020) ii. 5ha (April 2021)	Deforestation	<p>1.) Tamaco oil mill is a regular supplier to Mewah Datu Sdn Bhd.</p> <p>2.) The engagement was initiated with Tamaco team in early Jun-21. a.) In early July-21, Tamaco provided a chronology of de-forestation grievance record of the subject grievance. 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. c.) Since 31 Oct-19, Tamaco has committed to No New Planting and No New Development in Semai Mekar Sdn Bhd.</p> <p>3.) Base on ground checking on 12 June 2021, the 5ha "Earthqualizer-detected" deforested area has been cleared by the owner / native for their own purpose inside their NCR land. 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. 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.</p> <p>4.) Tamaco Group/ Semai Mekar Sdn Bhd was not involved in any clearing activity included for oil palm development in the stated area.</p> <p>5.) Tamaco has 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.</p> <p>6.) Mewah will continue engaging Tamaco on the progress of recovery plan.</p>	On-going monitoring/ verification

15	Innoprise Plantations	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 Estate in the period of May-21 d.) 18 ha deforestation at Gunung Rara Estate in the period of May-21	Deforestation	<p>1.) In year 2020, Mewah received CPKO supply from Wilmar's Bintulu Edible Oils (BEO).</p> <p>2.) Reference to Wilmar's sustainability dashboard, Serijaya Industri Sdn Bhd POM, which is a subsidiary under Innoprise Plantations Berhad (IPB), entered Mewah's supply chain through palm kernel (PK) supplied to Wilmar's Bintulu Edible Oils.</p> <p>3.) The engagement between Mewah and IPB was initiated in early July-21. (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. (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 <i>*100million tree-planting campaign</i> . (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.</p> <p>4.) 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 operation.</p> <p>5.) This case is CLOSED as the grievance falls beyond the scope of NDPE policy that is strictly application for oil palm planting.</p>	Closed
16	KPN Corp (KPN)	Agrarian problems and other unsustainable practices at PT Putra Lirik Domas (PT PLD)	Other	<p>1. 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.</p> <p>2. On 10-Jun-21, KPN issued an initial response of PT PLD regarding the subject grievance, the reference document may be found here: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/Initial_Response-Rev.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/Initial_Response-Rev.pdf</a></p> <p>3. Mewah commits to continue working closely with KPN in addressing the subject grievance.</p>	On-going monitoring/ verification
17	Perbadanan Kemajuan Pertanian Selangor (PKPS)	Clearing peat swamp forest in Sabak Bernam District	Peat Development	<p>1. 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).</p> <p>2. 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: a.) PKPS assured its commitment towards NDPE policy and reinstated there is no violation in its NDPE commitment. 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).</p>	On-going monitoring/ verification
18	Astra International Tbk	100ha deforestation within Martabe Mine area of PT Agincourt Resources Tbk	Deforestation	<p>1.) Mewah sourced 11,700.05MT CPO from PT Astra Agro Lestari - PT Letawa in 2019.</p> <p>2.) 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.</p> <p>3.) This grievance case will be treated as ineligible as it is irrelevant to the core business of Mewah.</p> <p>4.) 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 committed to monitorium on new land development.</p>	Closed/ Irrelevant

19	Boustead Plantation Sdn. Bhd.	51.6 hectares of land clearance is detected in Boustead Ladang G&G in Q3 2020	Deforestation	<p>1. Boustead Plantation is a regular CPO supplier to Mewah Group.</p> <p>2. 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.</p> <p>3. Boustead Plantation initiated investigation to the alleged deforestation concession at G&amp;G Estate (Coordinates: 5.08'22"N, 117.43'48.8"E)</p> <p>4. The following are the findings from investigation:  (i.) The alleged deforestation area located outside the boundaries of G&amp;G Estate, that is close to the security gate to the estate.  (ii.) 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.  (iii.) The work of felling and chipping the old palm has been taking place since year 2020.  (iv.) 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.</p> <p>5. After evaluating all available evidences, we decided to close the grievance case.</p>	Closed
20	Yayasan Pelajaran Johor (Johor State Government) - YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara)	78 hectares of forest were cleared in the YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara) concession between 26 Oct 17 to Oct 20.	Deforestation	<p>1.) 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).</p> <p>2.) 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.</p> <p>3.) Base on preliminary investigation (updated 27 Jan 2021):  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.  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.  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.</p> <p>4.) 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.</p>	On-going monitoring/ verification
		Earthqualizer detected land clearings in peat area of 12 ha on 2017 and 48 ha on 2018 at Ladang SSI Sg Ara concession (GPS: 2.03943859, 103.86125332 and 2.03390262, 103.85613524)	Peat Development	<p>1.) According to YPJ Plantation, the alleged land was leased from Johor State Government on 30th Aug 2017 for a period of 25 years.</p> <p>2.) 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.</p> <p>3.) 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.</p> <p>e. In Jan 2021, YPJ Plantation announced adherence to the NDPE criteria as described in their Sustainability Policy.</p>	
21	Bunga Group	255ha of land clearance/ deforestation activity in Value Greenworld Sdn Bhd in Nov 2019– Oct 2020.	Deforestation	<p>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.</p> <p>2. Sungai Kahang Palm Oil Mill is not a direct and/or indirect CPO supplier to Mewah.</p> <p>3. Sungai Kahang Palm Oil Mill appears in the CPKO supply base of Hok Huat POM, Jin Lee Oil Mill and PGEO Oil Mill.</p> <p>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:  a.) Bunga Group has been notified of the same grievance in early Nov-20.  b.) Bunga Group has been working with the Sustainability Department of Bunge Lodgers 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.  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 it 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.</p> <p>5. 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.</p> <p>6. Mewah will continue to assess the sustainability progress of the company closely.</p>	On-going monitoring/ verification

22	Perbadanan Kemajuan Negeri Pahang (PKNP)	93ha deforestation at PKNP Tembeling concession in the period of Jun-19 to Oct-20.	Deforestation	<p>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.</p> <p>2.) PKNP Agro owns 2 oil palm plantations in Pahang i.e. Ladang Mukim Hulu Tembeling and Ladang Ganchoong.  (a.) Ladang Mukim Hulu Tembeling is an immature oil palm plantation where the first phase of oil palm started in year 2016. Whereas, Ladang Ganchoong, has a size of 1,910ha and first planted in year 2011.</p> <p>3.) We expect all the different state-owned 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.</p> <p>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.</p> <p>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.</p> <p>6.) After evaluating all available evidence, we decided to close the grievance case.</p>	Closed
23	Perbadanan Kemajuan Pertanian Negeri Pahang (PKPP Plantation)	2ha deforestation at Ladang Cherating (Pahang) in the period of Jan-21	Deforestation	<p>1.) In the recent engagement with PKPP, the authority assured that:  a.) The Group and its subsidiaries are committed to a "stop work order" that issued on 25 Jan-21.  b.) All on-going oil palm 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 : <a href="https://ndpe.pkpp.gov.my/bulletin.html">https://ndpe.pkpp.gov.my/bulletin.html</a></p> <p>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.</p> <p>3.) In Oct 21, PKPP has  a.) published a NDPE policy on it website <a href="https://ndpe.pkpp.gov.my/index.html">https://ndpe.pkpp.gov.my/index.html</a>  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. In the same time, another project known as Payar Bungor Nadir and Herba, a conservation project to replanting rare wild jungle fruit trees and wild herbs trees in a secondary jungle area at Paya Bungor, Kuantan, in collaboration with local University, UiTM. The project with UiTM which involved 40 acres is still going.  c.) currently still engaging with PKPP officials regarding the progress of their recovery projects via email and phonenumber, pending for reply from PKPP</p>	On-going monitoring/ verification
		22ha deforestation at Ladang Cherating (Pahang) in the period of Mar-19 to Oct-20.	Deforestation	<p>1.) Dominion Square POM and LCSB Lepar POM are regular active suppliers to Mewah Group.</p> <p>2.) The engagement was initiated with the Plantation Director of PKPP Agro in early Nov-20.  a.) PKPP has agreed to put a stop to all land clearing activity at Ladang Cherating concession.  b.) The PKPP management has set aside two land banks located at Lipis, Pahang (426 ha) and Pekan, Pahang (130 ha) for its recovery plan.  c.) A group-wide NDPE policy is in the pipeline, pending for written resolution by the Board of Directors of PKPP.  d.) A full implementation of NDPE policy is expected to be done latest by 1 Jan-21.</p>	
		101ha deforestation at Sg. Charu (Pahang) in the period of Feb-19 to May-20.	Deforestation	<p>3.) In Jan 2021, PKPP launched a sustainability dashboard that summarized its sustainability commitment and progress on public platform. The PKPP NDPE policy is available at this website <a href="https://ndpe.pkpp.gov.my">ndpe.pkpp.gov.my</a>.</p> <p>4.) 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.</p> <p>5.) In Oct 21, PKPP has  a.) published a NDPE policy on it website <a href="https://ndpe.pkpp.gov.my/index.html">https://ndpe.pkpp.gov.my/index.html</a>  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. In the same time, another project known as Payar Bungor Nadir and Herba, a conservation project to replanting rare wild jungle fruit trees and wild herbs trees in a secondary jungle area at Paya Bungor, Kuantan, in collaboration with local University, UiTM. The project with UiTM which involved 40 acres is still going.  c.) currently still engaging with PKPP officials regarding the progress of their recovery projects via email and phonenumber, pending for reply from PKPP</p>	



24	Yayasan Pahang	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.	Peat Development	<p>1.) Reference made to our engagement with Far East Holdings Bhd, iKHASAS Group, Yuwang Group, and Sime Darby, the responses are summarized as follows:</p> <p>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.</p> <p>b. YP Plantation explained its decision 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 conducted and approved by the Department of Environment.</p> <p>c. YP Plantation further explained that the Board of YP Plantation Sdn Bhd has issued a stop work order on the development of peat in the Gugusan Bebar concession in Pekan Pahang of 4,093.95 hectare on 17 August 2020. A stop work order has been issued on the remaining 800Ha unplanted area of the new development namely Ladang Pekan Timur and Ladang Pekan Barat.</p> <p>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.</p> <p>2.) On January 2021, YP Plantation has formally appointed Global Environment Centre (GEC) to facilitate an initial three-years of the Recovery Project.</p> <p>a. A recovery plan is developed, a total area of 4,800ha of forested and degraded peatland within Pekan Forest Reserve, for a period of 20 years (Feb 2021-Feb2024) as Recovery Project.</p> <p>b. The recovery plan involved multi-stakeholder, such as local communities, Ministry of Energy and Natural Resources and Forestry Department of Peninsular Malaysia.</p> <p>c. A public statement regarding the Recovery Project is publicly available on their website: <a href="https://ypph.com.my/v4/2021/04/13/kerjasama-program-pemulihan-hutan-antara-ypph-global-environment-center-gec/">https://ypph.com.my/v4/2021/04/13/kerjasama-program-pemulihan-hutan-antara-ypph-global-environment-center-gec/</a></p> <p>d. The Recovery Project is in progress, with drone survey, native trees seedlings collection and local communities interview were being conducted for the period of Feb-May 21'. More detail can be found in the progress report, which is available on their website: <a href="https://ypph.com.my/v4/2021/06/12/projek-pemuliharaan-ypph-gec-pencegahan-kebakaran-dan-pemuliharaan-bahagian-tenggara-hutan-simpan-pekan/">https://ypph.com.my/v4/2021/06/12/projek-pemuliharaan-ypph-gec-pencegahan-kebakaran-dan-pemuliharaan-bahagian-tenggara-hutan-simpan-pekan/</a></p> <p>3.) Mewah will continue to assess the sustainability progress of the company closely.</p> <p>4.) YP Holdings Sdn Bhd also created a wordpress blog/newsletter dedicated in the updating of the progress of the recovery project with GEC quarterly. More detail can be found in the link here: <a href="http://ypph.com.my/v4/category/sustainability/">http://ypph.com.my/v4/category/sustainability/</a></p> <p>5.) Mewah will still continue to assess the sustainability progress, particularly the progress of their recovery project with GEC closely.</p>	On-going monitoring/ verification
25	Amanah Saham Pahang	Deforestation activities 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.	Deforestation	<p>1.) Reference made to our engagement with Far East Holding Bhd, Chin Teck and Yuwang Group, the responses are summarized as follows:</p> <p>(a). Since July 20, ASPA is adopting to a new comprehensive set of NDPE policy and pledges with immediate moratorium on new land development. * The ASPA's NDPE policy has been shared across to Mighty Earth.</p> <p>(b). ASPA is engaged in discussions with a consultant - Dr. Faizal Parish, Director of the Global Environment Centre (GEC), to study potential remedial actions.</p> <p>(c). ASPA is working on a public announcement about the grievance.</p> <p>2.) On 21 and 22 September 2020:</p> <p>(a) ASPA had released a public announcement on the collaboration between ASPA and GEC on their website (<a href="https://www.aspaphg.com/index.php/ms/berita2/58-gec1#">https://www.aspaphg.com/index.php/ms/berita2/58-gec1#</a>).</p> <p>(b) The outcomes of the site visit and proposal were reverted to the Board Member of ASP.</p> <p>3.) On Feb'22, according to the supplying palm oil mill, they have stopped sourcing FFB from ASP.</p> <p>4.) Based on the information found in the website of Amanah Saham Pahang website, the time bound action plan related to the recovery project are shown dated November 2020. Link for reference is below with time bound action plan + High Biodiversity Value report from ASPA <a href="https://www.aspaphg.com/index.php/ms/kelestarian/pelan-kelestarian">https://www.aspaphg.com/index.php/ms/kelestarian/pelan-kelestarian</a></p> <p>4.) Mewah will continue to assess the sustainability progress of the company closely.</p>	On-going monitoring/ verification

26	Permata Hijau Group	Presence of PT. Surya Panen Subur (SPS) in Permata Hijau's supply chain	Other	<p>1.) In the period of Jan – Jun 20, Mewah-Oils (Port Klang) sourced 3,000MT CPKO directly from Permata Hijau Group.</p> <p>2.) 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.</p> <p>3.) During recent engagement in Aug-20, Permata Hijau confirmed that it had suspended all CPO purchase from PT SPS II.</p>	Closed
27	Instant Star Holdings Sdn Bhd	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.	Deforestation	<p>1. In Jan - Jun'20, Mewah source CPKO from Wilmar Sandakan Edible Oils. IJM - Sabang 1 POM and Sabang 2 POM are the PK suppliers to Wilmar Sandakan Edible Oils.</p> <p>2. In our engagement with Wilmar, it is understood that:</p> <p>a. IJM has already engaged with Aspirasi Kristal and Satria Eramaju, where both their FFB suppliers are required to adhere to the NDPE policy.</p> <p>b. Aspirasi Kristal has stopped their land clearing activities in July 2020, while Satria Eramaju do not have any active clearing activities.</p> <p>c. Engagement with these companies are still ongoing, updates will be made available when there is new development to the case.</p> <p>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.</p> <p>e. Notwithstanding the above, IJM has already <i>suspended</i> the FFB supply from Aspirasi Kristal until they are able to provide supporting evidence to their claims.</p>	Suspended

28	Sime Darby Plantation Bhd	Forced labor and child labour issue within SDP's operation	Human Rights/ Labour Issue	<p>1. In Apr 2020, Hong Kong based NGO, Liberty Shared released a petition against Sime Darby Plantation (SDP) Berhad regarding allegations of forced labour and child labour in Sime Darby's operations. The petition was also submitted to the United State Customs and Border Protection (CBP).</p> <p>2. Mewah initiated engagement with SDP since April 2020.</p> <p>3. On 10 July 2020, SDP released a summary of the measures to address the concerns highlighted in the US CBP petition: <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation%E2%80%99s-response-liberty-shared%E2%80%99s-petition-united-states">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation%E2%80%99s-response-liberty-shared%E2%80%99s-petition-united-states</a></p> <p>4. On 7 August 2020, SDP released a latest statement in response to the Statement Made by Liberty Shared dated 4 August 2020: <a href="https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation%E2%80%99s-response-statement-made-liberty-shared-dated-4-august">https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation%E2%80%99s-response-statement-made-liberty-shared-dated-4-august</a></p> <p>5. On 10 November 2020, Sime Darby Plantation Berhad released report on its appointment of PWC South East Asia consulting and an independent NGO to assist with the assessment of and potential improvements to its corporation governance, risk management and internal controls.</p> <p>6. On 30 December 2020, US CBP issued a Withhold Release Order (WRO) against all palm oil and products contain palm oil produced by Sime Darby Plantation Berhad and its subsidiaries, joint ventures, and affiliated entities in Malaysia.</p> <p>7. The issuance of WRO against SDP palm oil is based on information that reasonably indicates the presence of all 11 of the International Labour Organization's forced labour indicators in SDP's production process.</p> <p>8. During the period of 2021-2022-</p> <p>a.) In August 2021, SDP rolled out its revised Responsible Recruitment Procedure (RRP) and Management Committee in regard to ethical recruitment.</p> <p>b.) In November 2021, SDP board has approved a provision of RM 82.02millions to reimbursement of recruitment fees for the existing and past foreign workers.</p> <p>c.) In November 2022, SDP released a public statement on their action plans on RSPO Verification Assessment, <a href="https://simedarbyplantation.com/sime-darby-plantations-submission-of-action-plan-to-rspo/">https://simedarbyplantation.com/sime-darby-plantations-submission-of-action-plan-to-rspo/</a></p> <p>d.) More info refer to official statement from SDP- <a href="https://simedarbyplantation.com/sime-darby-plantation-institutes-sweeping-changes-in-governance-and-operations/">https://simedarbyplantation.com/sime-darby-plantation-institutes-sweeping-changes-in-governance-and-operations/</a></p> <p>9. 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 all Mewah's refineries to phase out SDP's production from the production of palm oil shipment to U.S.</p> <p>10. On Mar 2023, US CBP released an official statement regarding palm oil and derivatives products from Sime Darby is no longer subject to the allegation on Forced Labour and Child Labour. Refer here for the official statement- <a href="https://www.federalregister.gov/documents/2023/02/03/2023-02286/determination-that-maintenance-of-finding-of-january-28-2022-pertaining-to-certain-palm-oil-and">https://www.federalregister.gov/documents/2023/02/03/2023-02286/determination-that-maintenance-of-finding-of-january-28-2022-pertaining-to-certain-palm-oil-and</a>.</p>	Closed
		Deforestation at Derawan (SOU 33) concession in Sarawak during Feb - Aug 2019	Deforestation	<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. Reference made to Sime Darby Plantation's response as follows:</p> <p>(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.</p> <p>(b.) Full press statement response as follow <a href="http://www.simedarbyplantation.com/media/pressreleases/statement-response-rapid-response-palm-oilreport-19-mighty-earth">http://www.simedarbyplantation.com/media/pressreleases/statement-response-rapid-response-palm-oilreport-19-mighty-earth</a></p> <p>4.) 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 regarding the issue of the concession boundary, this matter has been resolved to Mighty Earth's satisfaction.</p>	Closed

		<p>1.) Urun Plantations (Parent: Sin Heng Chan (Malaya) Bhd), 97 ha deforestation in the period of 2016 - 2023 at Kapit, Sarawak.</p>	<p>Deforestation</p>	<p>1) On end June 2023, Mewah received a grievance reported by Fuji Oil. The grievance report related to deforestation by Urun Plantations, Sarawak (an independent plantation group), MSPO certified and has been sighted in the latest MSPO Audit report (<a href="https://mspotrace.org.my/audit_reports/asa3_EST2023_OPMC31646-2023-03-28_09:50:16.pdf">https://mspotrace.org.my/audit_reports/asa3_EST2023_OPMC31646-2023-03-28_09:50:16.pdf</a>) of supplying FFB to Sarawak Oil Palm Berhad and Belaga Palm Oil Mill Sdn Bhd.</p> <p>2) Mewah has reached out to SOPB to being the grievance investigation.</p> <p>3) Pending reply from SOPB</p> <p>4.) On 08 August 2023, Mewah received a grievance reported by Fuji Oil. The grievance report related to deforestation by Urun Plantations, Sarawak (an independent plantation group), MSPO certified and has been sighted in this report (file:///C:/NG%20TING%20YONG/Downloads/Deforestation%20Monitoring%20Period%2016%E2%80%9330%20June%202023_Urun%20Plantations%20Sdn%20Bhd%20(1).pdf ) of supplying FFB to Sarawak Oil Palm Berhad and Belaga Palm Oil Mill Sdn Bhd. (Deforestation Locations: <b>3.06332284, 114.26949310 and 3.06320397, 114.25491250</b>)</p>	<p>On-going monitoring/ verification</p>
<p>29</p>	<p>Shin Yang Group/ Sarawak Oil Palm</p>	<p>2.) Linau Mewah - Linau Sinar Oil Palm Estate: 10 ha peat development &amp; 9 ha deforestation in 2019.</p>	<p>Deforestation</p>	<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 Earty 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> <p>7.) Our last purchase from SOPB is in Dec'2019.</p>	<p>On-going monitoring/ verification</p>
<p>30</p>	<p>QL Resources Bhd</p>	<p>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.</p>	<p>Deforestation</p>	<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 spokperson of PT PMI, the company was 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>	<p>On-going monitoring/ verification</p>

31	TH Plantation Bhd	New land development in concession Deru Semangat Sdn. Bhd., at Pahang, Malaysia without HCS assessment.	Other	<p>1.) TH Plantation Bhd ("THP") has been a long-term 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 end of Aug 2020.</p> <p>5.) THP's management has stated their commitments towards NDPE in THP Sustainability Policy, with effective date on 27 Feb 2019. <a href="http://www.thplantations.my/doc/THP_Sustainability%20Policy_Final_v1.pdf">http://www.thplantations.my/doc/THP_Sustainability%20Policy_Final_v1.pdf</a></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> <p>7.) 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 follows:  a. On 2 Oct-20, Lembaga Tabung Haji (LTH) has declared a moratorium on new land development in DSSB Ladang Tembeling.  b. THP is finalising the termination of Management Agreement with DSSB.  c. THP assure that it will unconditionally assist LTH to unwind its shareholdings in DSSB to permanently cut off THP's link from DSSB.  d. THP is considering potential recovery plan in collaboration with a suitable NGO/ consultant.</p> <p>8.) On 2 Aug 2021, TH Plantation agreed to a 7 years recovery plan, to rehabilitate degraded forest area in Nenasi, Pahang with Global Environment Centre.</p> <p>9.) On 1 Sept 2022, TH Plantation signed an official agreement with GEC for a Recovery Plan Project, with target to implement by early Jan 2023 and run for seven (7) years until January 2029. The project area is located in and around Gunung Arong Forest Reserve in Mersing District, which covers approximately 1,500ha off degraded peat swamp forest/peatland.</p> <p>10.) The goal of the project is to protect and rehabilitate forests and peatlands in the north-eastern section of Gunung Arong Forest Reserve.</p>	On-going monitoring/ verification
	TH Plantation Bhd	Deforestation at its PT Persada Kencana Prima (North Kalimantan), Hydroflow Sdn Bhd plantations in Sarawak and Ladang Tabung Haji in Sarawak.	Deforestation	<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 neighbouring 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 channelled 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 monitoring/ verification

32	Agusan Plantations Inc	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.	Human Rights/ Labour Issue	<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
33	Pinehill Pacific Bhd	Deforestation of 21 ha at PT Makmur Jaya Malindo concession during the period of May - July 2019.	Deforestation	<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
34	NPC Resources	Deforestation and/or peat development of 1,047 ha at PT Sumber Alam Selaras concession during the period of Sept-Nov 2019.	Fire Occurance	<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> <ul style="list-style-type: none"> <li>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.</li> <li>b.) It was confirmed by Aidenvironment that, it was the fire that caused the land use change and not "deforestation".</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul> <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

35	Borneo Pacific Group	70ha deforestation at PT Arjuna Utama Sawit concession in the period of Sept-Dec 2019.	Deforestation	<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 Arjuana Utama Sawit is neither a related compnay/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>	Closed
36	Goodhope Holding	39 ha deforestation at PT Rim Capital, a subsidiary of Goodhope during the period 11th September - 2nd November 2019.	Deforestation	<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 the lands due to peat soil. Good hope 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
37	Global Enterprise Sdn Bhd	17 ha deforestation and/or peat development at PT Bulungan Surya Mas Pratama - during Jan Oct 19	Deforestation	<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, "<b>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.</b>"</p> <p>4.) Global Enterprise Sdn Bhd has checked on the ground and shared corrected information to update the situation.</p> <p>5.) 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.</p>	On-going monitoring/ verification

38	Tradewinds Plantation Berhad	<p>CB Industrial Product Holding / Jhonlin Group - Deforestation at PT Kurun Sumber Rezeki during Feb - July 2019</p> <p>(**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>	Deforestation	<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, "<b>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.</b>"</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 monitoring/ verification
		<p>Deforestation at Trans Kenyaland Sdn. Bhd. concession in Sarawak since Nov 2018 - July 2019</p>	Deforestation	<p>1.) 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.</p> <p>2.) 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).</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 Kenyaland's boundary.</p>	On-going monitoring/ verification
39	Genting Plantation Bhd	<p>Deforestation at PT Citra Sawit Cemerlang &amp; PT Permata Sawit Mandiri concession in West Kalimantan since Jan'19 - May'19.</p>	Deforestation	<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) &amp; 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>	On-going monitoring/ verification



40	Kwantas	Deforestation at Kwantas Pelita Plantation (Balingan) Sdn Bhd concession in Sarawak in Feb-Mar'19.	Deforestation	<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:</p> <ul style="list-style-type: none"> <li>a) The land is located within the parameter of Kwantas Pelita Plantation (Balingan) Sdn Bhd (KPPSB) concession;</li> <li>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;</li> <li>c) As of yet, the land area belongs to two owners Akas Ak. Ngelambau and Beribun Ak. Baring;</li> <li>d) KPPSB has never involved on the activities conducted on the land.</li> </ul> <p>3.) As at date of publication of this log, there is no further evidence presented to support this allegation.</p>	On-going monitoring/ verification
41	Double Dynasty - Radiant Lagoon Sdn. Bhd.	Land conflict and deforestation at Radian Lagoon Sdn. Bhd. concession in Sarawak in Dec 18 - Jan 19.	Deforestation	<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> <p>7.) In July 2019, DD Group has met all the criteria stipulated in the re-entry criteria, including their commitment to the Development of Recovery Plan for Non-Compliant Land Clearing to NDPE policy at group level incurred from January 2016 onwards. Based on the detailed review of documentation, reports and letter of commitment from DD Group, the Wilmar Suspension Committee have given due consideration of this progress and have lifted the suspension on the DD Group in July 2019.</p>	Closed

42	FGV	<p>1.) Suspension of RSPO P&amp;C certificate for Seriting 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&amp;C certification for Seriting Palm Oil Mill and all its uncertified units.</p>	Human Rights/ Labour Issue	<p>1.) In Year 2018, Mewah received CPO supply from 18 FGV's palm oil mills. Seriting Palm Oil Mill is one of the supplied FGV's palm oil mills to Mewah-Oils (Port Klang).</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> <ol style="list-style-type: none"> <li>To freeze all new recruitment of workers from external contractors across its operations, with immediate effect.</li> <li>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.</li> <li>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 &amp; safety procedures.</li> <li>To engage with a responsible independent third party to train its workers on its human rights policy.</li> <li>To adhere strictly on national policies and all applicable standards on parity of employment for workers including remuneration and benefits in kind.</li> <li>To continue its commitment towards RSPO P&amp;C certification.</li> </ol> <p>4.) As at Jan-2019, we do not enforce ban/ exclusion for the CPO supply from Seriting 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 Compliant 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&amp;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 &amp; Eisenhofer ESG Institute to the US Customs and Border Protection (CBP) on “forced labour &amp; 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 Seriting 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: <a href="http://www.fgvholdings.com/fgvs-response-to-the-petition-by-a-coalition-of-ngos-submitted-to-the-united-states-customs-and-border-protection/">http://www.fgvholdings.com/fgvs-response-to-the-petition-by-a-coalition-of-ngos-submitted-to-the-united-states-customs-and-border-protection/</a></p> <p>12.) 22 Aug 19 - Mewah engaged with FGV's team to further understand their progress:</p> <ol style="list-style-type: none"> <li>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.</li> <li>The Company has been working hard to seek restoration to RSPO certification. It has undertook comprehensive assessment to identify gaps and to implement stringent recruitment guidelines and labour policies in its worldwide plantation operations.</li> <li>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.</li> <li>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.</li> </ol> <p>13.) 13th Jan 2020, RSPO Complaint Panel re-suspended the Principles and Criteria (P&amp;C) process for FGV's Seriting Palm Oil Mill and all its uncertified units.</p> <p>14.) On 21 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.) FGV met with the CBP together with several related agencies of the US Department of State in Washington DC in February 2020 to discuss FGV's initiatives and programmes relating to labour. The meeting was also attended by a representative of the Fair Labor Association (FLA) and the legal firm appointed by FGV.</p> <p>17.) On 18 June 2020, the RSPO Complaint Panel responded to FGV, indicating that the appeal was not allowed on procedural grounds, stating that the decision by the CP as reflected in their letter dated 13 January constituted a sanction and therefore did not qualify for an appeal. FGV holds a different view as the matter can be argued differently, and we are currently considering ways to raise the matter with the RSPO.</p> <p>18.) On 30 Sept 2020, the US CBP issued Withhold Release Order (WRO) against palm oil and palm oil products made by FGV after a year long investigation.</p> <p>19.) On 14 Oct 2020, FGV updated its engagement and development with US CBP. The full announcement can be found at: <a href="https://www.fgvholdings.com/wp-content/uploads/2020/10/Updates-on-the-CBP-WRO.pdf">https://www.fgvholdings.com/wp-content/uploads/2020/10/Updates-on-the-CBP-WRO.pdf</a></p> <p>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 all Mewah's refineries to phase out FGV's production from the production of palm oil shipment to USA.</p>	On-going monitoring/ verification
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42	FGV	<p><b><u>A. PT Citra Niaga Perkasa, Landak Regency, West Kalimantan Province, Indonesia</u></b>  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).</p> <p><b><u>B. PT Temila Agro Abadi, District of Landak and Village of Kuala Mandor, West Kalimantan Province, Indonesia.</u></b>  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 peatland.</p>	Other	<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>	On-going monitoring/ verification
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43	Rimbunan Hijau/Jaya Tiasa	Potential peatland clearance and forest clearance for oil palm development in Eastern Eden Estate (EEE), Sarawak and Gilford LTD, PNG.	Peat Development	<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, 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 occurred within EEE's concession. Jaya Tiasa has shared their groupwide concession map with Wilmar for on-going monitoring.</p>	On-going monitoring/ verification
		Deforestation of 85 ha at LPF/0024 in Belaga Regency, Sarawak during period of Nov 2018 - Jan 2019.	Deforestation	<p>1.) 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.</p> <p>2.) With reference to Wilmar's Grievance List, it reports that the land clearing is not related to oil palm development.</p> <p>3.) As at date of publication of this report, no further evidence is presented to support this allegation.</p>	Closed

44	Goodhope Holding	Deforestation, development without Environmental Impact Assessment and failure to comply to proper FPIC process at its concession PT Nabire Baru, in Nabire, Papua.	Deforestation	<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
45	BLD Plantation Bhd	Deforestation at BLD Plantation Bhd concession in Sarawak since Mar - Dec 2018.	Deforestation	<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> <p>5.) 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 <a href="http://dashboard.bldpb.com.my/">http://dashboard.bldpb.com.my/</a>.</p> <p>6.) Mewah will continue to assess the sustainability progress of the company closely.</p> <p>7.) In May 23, we released trade suspension for BLD Plantation. This is in view of significant sustainability progress made by BLD Plantation since year 2019.</p> <p>i. Commitment in recovery project with progress on engaging a local conservation expert, Joanes Unggang, to assess the HCS &amp; biodiversity level of the three sites zoned for conservation.</p> <p>ii. There is no other new deforestation alert brought up against BLD Plantation.</p> <p>iii. BLD Group will develop a time-bound action plan to conserve and protect these three plots of land.</p> <p>iv. Mewah commits to continue working closely with BLD Group to progress in its sustainability journey.</p>	On-going verification/ monitoring

46	Tee's Family / Prosper Group	Tee Family Summary Report - Deforestation/ social exploitation in Bewani Oil Palm Plantation (PNG)	Human Rights/ Labour Issues	<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 prodcuts 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 Leap Holding Ltd.</p> <p>8.) 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>9.) On 30th April 19,</p> <ul style="list-style-type: none"> <li>i. Prosper launched a Sustainability website <a href="http://www.prosper.com.my/Sustainability-Sustainability-Initiatives.html">http://www.prosper.com.my/Sustainability-Sustainability-Initiatives.html</a></li> <li>ii. Prosper released a bilingual Sustainable Palm Oil Policy (which is later revised on 31 July 2019)</li> <li>iii. Prosper released a NDPE policy time-bound implementation plan</li> <li>iv. Prosper launched grievance procedure in its Sustainability dashboard</li> </ul> <p>10.) 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.) On 16 May 21- We officially announced released trade suspension for ALL Prosper Group's Palm Oil Mill. This is in view of significant sustainability progress made by Prosper Group since year 2019.</p> <ul style="list-style-type: none"> <li>i. Steady and committed progress in recovery project.</li> <li>ii. On or around March 19, Prosper commenced phase 1 recovery plan of 3,000ha peat restoration program at Bukit Belata, Selangor. The program has successfully gained acknowledgement by major NGOs in the industry.</li> <li>iii. In March-21, Prosper confirmed it will extends recovery program into phase 2; covering additional 7,000 ha peatland restoration.</li> <li>iv. There is no other new deforestation alert brought up against Prosper Group since the last took place in 2018 at Bewani Oil Palm, Papua New Guinea.</li> <li>v. More periodically update (latest April 2022), refer <a href="https://prosper.com.my/Sustainability-Conservation-and-CSR.html">https://prosper.com.my/Sustainability-Conservation-and-CSR.html</a></li> </ul> <p>14.) Mewah commit to continue working closely with Prosper to progress in its sustainability journey</p>	On-going verification/ monitoring
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47	Samling Group-Glenealy Plantations	1.) 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.	Human Rights/ Labour Issue	<p>1.) Glenealy Plantations Malaysia-based subsidiaries - Timora Palm Oil Mill is a regular CPO supplier to Mewah.</p> <p>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.</p> <p>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.</p> <p>5.) On 2 April 2019, Mewah reached out to Glenealy to seek clarification on deforestation allegation in Marudi &amp; Batu Belah.</p> <p>6.) Through an email between Mewah and Glenealy 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 Glenealy in Feb 2020 says that, Marudi LPF is a reforestation area that operated by Samling Group 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 &amp; Indicators of the MTCS.</p> <p>8.) In Apr-20, Glenealy announced its commitments towards NDPE and issued a group-wide memorandum on any new land development. No land clearing for all greenfield development on mineral soil and peatland regardless of depth with immediate effect.</p> <p>9.) In Aug 2020, Glenealy rolled out corporate website to engage further with its stakeholders. <a href="http://glenealyplantations.com.my/">http://glenealyplantations.com.my/</a> as one of the milestone under Glenealy Plantations' NDPE implementation plan.</p> <p>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.</p> <p>11.) In April-21, Glenealy published NDPE policy implementation plan.</p> <p>12.) In August-21, Glenealy published its first Sustainability Report for financial year 2020: <a href="http://glenealyplantations.com.my/docs/sustain/Sustainability%20Report%202020.pdf">http://glenealyplantations.com.my/docs/sustain/Sustainability%20Report%202020.pdf</a></p>	On-going verification/ monitoring/Suspended
		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.	Deforestation		
		3.) Use of fire - apparent use of fire in land clearing process in Ome-Ome project in PNG.	Deforestation		
		4.) Deforestation of 104ha in LPF /0006 Lana in Sept - Nov 2018.	Deforestation		
		5.) Deforestation and clearance preparation in LPF /0007 Jelalong in Apr 2019 - Apr 2020.	Deforestation		
		6.) Peat development of 6ha in LPF 0014 by Samling Timber Sdn Bhd in Jan - July 2019.	Peat Development		
		7.) Deforestation in LPF/ 0008 Marudi & Batu Belah concession by Sampling Reforestation (Bintulu) Sdn Bhd in Jan 2019 - July 2020.	Deforestation		