

Master list - Ongoing; Last updated February 2020

Based on H1/ H2 2019 traceability data. Best endeavours are taken to ensure accuracy of data.

The list is being periodically updated. For further information, or to file a grievance, please contact: global-sustainability-palm@ldc.com

Ref No	Group Supplier	Supplier Entity	Source	Comments
Direct Suppliers Grievances				
1	Dharma Satya Nusantara (DSN)	PT Prima Sawit Andalan (PT PSA) PT Putra Utama Lestari (PT PUL)	Mighty Earth Rapid Response Report	LDC has engaged the supplier. In July 2019, the following information was obtained: PT PSA stopped clearing the area in 2015 and no clearing carried out since. DSN provided evidence, confirming that the alleged land clearing was carried out by local communities in the area, and not by the company. The issue has been reported to the local police, the community leader and the head of village. As for PT PUL, DSN has carried out on-the-ground checking. The deforestation took place outside the concession area: local communities had cleared the area for rice paddy fields. This case is now considered closed.
2	Genting Plantation	PT Citra Sawit Cemerlang (PT CSC) PT Permata Sawit Mandiri (PT PSM)	Mighty Earth Rapid Response Report	LDC is engaging with the supplier. In May 2019, LDC received the following information: Supplier started an HCS Study in PT CSC with Aid Environment in Nov 2016. The field work stopped in May 2019. The alleged deforestation is not in the HCS area. Supplier has ceased clearing since May 2019. The final HCS assessment has been submitted to HCSA Secretariat at the end of May 2019, pending the approval. See http://highcarbonstock.org/registered-hcsa-assessments/ Supplier claimed that PT PSM has not been part of Genting Plantation since 2017.
3	Goodhope	PT RIM Capital	Mighty Earth Rapid Response Report	LDC has engaged the supplier. In Dec 2019, LDC received the following clarification: the alleged land clearing occurred as a result of landfires on community-owned areas on 20th September 2019. The company has made and submitted a report to local authorities on the land fires that occurred in the vicinity of PT RIM Capital. 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.
4	Kencana Agri	PT Agro Sawit Mas Lestari (PT ASML)	Mighty Earth Rapid Response Report	LDC has engaged the supplier. Supplier provided evidence in July 30th 2019 that the alleged land clearing is located outside their concession area. This case is considered closed.
5	Kuala Lumpur Kepong Berhad	PT Menteng Jaya Sawit Perdana PT Jabontara Eka Karsa	Mighty Earth Rapid Response Report Forest Report	LDC has engaged the supplier. Supplier responded that the alleged land clearing is located outside their concession area. The details see https://www.klk.com.my/sustainability/market-place/grievance/ This case is considered closed.
6	Lyman Agro	PT Bonti Permai Jayaraya	Mighty Earth Rapid Response Report	LDC has engaged the supplier. Supplier responded that the alleged land clearing is located outside their concession area. During the period of Jan-Aug 2019, they didn't have any land clearing activity. Supplier provided evidence overlaying with their concession map. This case is considered closed.
7	Palma Serasih Group	PT Global Primatama Mandiri (GPM)	Mighty Earth Rapid Response Report	LDC has engaged with the supplier. Supplier has provided evidences that HCV assessment is carried out in 2016, and also an Orangutan survey (both analysis with external parties). The cleared area was not in HCV area. Currently on the process to carried out a HCS assessment. Their progress is in accordance with the timeline shared by the supplier. LDC to continue monitoring progress.
8	Sampoerna	PT Usaha Agro Indonesia	Mighty Earth Rapid Response Report	LDC has contacted the supplier regarding the allegation. The supplier responded that the area was held within community areas. LDC is continuing to engage for more information.
9	Triputra Group (TAP)	PT Dwiwira Lestari Jaya (PT DLJ)	Mighty Earth Rapid Response Report	LDC has engaged with the supplier. TAP has an NDPE policy. HCS and HCV assessment of PT DLJ were conducted in 2014 and 2016 and no clearance in the HCS/HCV areas. Maps have been shared and reviewed by 3rd parties. Grievance of PT DLJ is considered closed.
Indirect Suppliers Grievances				
1	Anglo Eastern	Deforestation by PT Kahayan Agro Plantation	Greenpeace report: "Deforestation case studies"	Exposure via ICOF Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.

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2	Austindo Nusantara Jaya	Deforestation by PT Permata Putra Mandiri and PT Putera Manunggal Perkasa, West Papua	Greenpeace report: "Deforestation case studies"	No longer in the LDC supply chain (H1 2019) Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners. LDC first engaged ANJ in 2016, and has since been monitoring.
3	Bakrie Plantation	Land clearance and preparation by PT Menthobi Mitra Lestari	Mighty Earth Rapid Response Report	Exposure via AAK, BAT, CCFT, GAR, ICOF, IOI LDC engaged with trading partner. Supplier claims the alleged company is not part of Bakrie Plantations since 2017.
4	BBC Holding Sdn Bhd	Almabumi Plantation Sdn Bhd	Mighty Earth Rapid Response Report	LDC engaged with trading partner. Supplier claims the alleged company was Almabumi Plantation Sdn Bhd, instead of Alambumi Sdn Bhd. It is similar with our trading partner's supplier, but not connected.
5	BEST Group	Deforestation by: - PT Wanasawit Subur Lestari - PT Karya Luhur Sejati - PT Menara Tunggal Perkasa	Chain Reaction Research 2019 Mighty Earth Rapid Response Report	LDC has been engaging the supplier regarding their sustainability policies and practices. Notice period has been communicated unless several conditions are met.
6	BLD Plantation	Forest and peat clearance	Mighty Earth Rapid Response Report	No longer in the LDC supply chain (H1 2019). Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
7	Borneo Pacific	PT Arjuna Utama Sawit	Mighty Earth Rapid Response Report	LDC has engaged with the trading partner. The trading partner has reviewed the evidence, and declared that the clearance area is outside the concession of alleged party
8	CB Industrial Product Holding Berhad	Deforestation by PT Kurun Sumber Rezeki (PT KSR)	Mighty Earth Rapid Response Report	No longer in the LDC supply chain (H1 2019). Earlier in 2019, LDC had engaged with the trading partner through whom LDC has exposure. CBIP claim, they have disposed their controlling shares of the company to PT Jhonlin Agro Mandiri in 2016, currently own only 20%.
9	Citra Borneo Indah/SSMS	PT SSMS supplying the "Leakage Market" Deforestation by PT Sawit Mandiri Lestari	Chain Reaction report: "Sawit Sumbermas Sarana: Supplying the Palm Oil Leakage Market, Risks for Purchasers" Greenpeace report: "Deforestation case studies"	Not on LDC's approved purchase list. LDC first engaged CBI in March 2018, and has since been monitoring.
10	Dhanista Surya Nusantara	PT Sabhantara Rawi Sentosa	Mighty Earth Rapid Response Report	LDC had engaged with trading partner. They have confirmed and verified that the alleged land clearing is located outside PT SRS concession. [https://www.musimmas.com/sustainability/group-supplier-engagement-grievance/grievance-list/dhanistha-surya-nusantara-dsn]

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11	FGV Holding Berhad/Felda	Deforestation by PT Temila Agro Abadi, West Kalimantan Allegation to Human Rights and Labour Rights Practices	Mighty Earth Rapid Response Report Grant & Eisenhofer ESG Petition to US Custom and Border Protection International Labor Rights Forum (ILRF), Rainforest Action Network (RAN) and SumOfUs Petition to US Custom and Border Protection	Exposure via AAK, BAI, CCFT, Genting, Hapseng, IOF, IOI, Keckseng, Mewan, Sime Darby, Wihmar (H1 2019) LDC has been engaging Felda to monitor progress since February 2018. A stop-work order was issued for the site under grievance. Peat restoration plan has been submitted by FGV for approval by Indonesia's Ministry of Environment and Forestry (April 2018). FGV Group has submitted several progress report and action plan to RSPO. In August 2019, RSPO has lifted certification suspension for FGV's Serting Complex. http://www.fgvholdings.com/lifting-of-certification-suspension-for-fgvs-serting-complex/ FGV has issued a public statement responding to ESG Petition on 26th June 2019, and to coalition of NGOs' petition on 19th August 2019. http://www.fgvholdings.com/fgv-holdings-berhads-response-to-the-petition-by-grant-eisenhofer-esg-institute/ http://www.fgvholdings.com/fgvs-response-to-the-petition-by-a-coalition-of-ngos-submitted-to-the-united-states-customs-and-border-protection/ Also FGV has established multidisciplinary group of NGOs on Human Rights Remediation Efforts, with the support of Procter & Gamble Company in September 2019. http://www.fgvholdings.com/wp-content/uploads/2019/09/Letter-from-FGV-GCEO-to-Business-Partners-on-Improving-Labour-Practices.pdf On 13 January 2020, RSPO has suspended the Principles and Criteria (P&C) certification processes for all uncertified units of Felda Global Ventures Holdings' (FGV Holdings) and reimposed its suspension on FGV Holding's Kilang Sawit Serting for non-compliance of the Complaints Panel Decision dated 28 November 2018.
12	KPN Plantation (GAMA Group)	PT Graha Agro Nusantara, West Kalimantan; PT Agriprima Cipta Persada, Papua; PT Persada Alam Jaya in Tesso National Park, Riau; PT Sumatera Unggul Makmur, West Kalimantan; PT Agrinusa Persada Mulia (APM)	Greenpeace report: "Rogue Trader: Keeping Deforestation in the Family" Eyes of the Forest Report: "Enough is Enough" Mighty Earth Rapid Response Report	Exposure via AAStar Following engagement with KPN Plantation, LDC has recently resumed trading with KPN and continues to engage directly. KPN publish the grievance on PT APM (http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf). Local district open the area inside APM concession for 4 transmigration settlement & villages.
13	Korindo	Deforestation by PT Tunas Sawa Erma, Papua	Greenpeace report: "A deadly trade off"	Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
14	Kwantas	Deforestation by Kwantas Pelita Plantation (Balingan) Sdn Bhd	Mighty Earth Rapid Response Report	Exposure via Genting, Kwantas LDC is monitoring updates from intermediate trading partners. Trading partner has been engaging the supplier since May 2019.
15	Miwon Group	Local community conflict PT Sintang Raya	Mighty Earth Rapid Response Report	LDC last trade with the supplier was in 2018. LDC will continue to monitor the progress.
16	Perkebunan Nusantara	Deforestation by PT Perkebunan Nusantara II Prati	Mighty Earth Rapid Response Report	Exposure via GAR, Virgoz LDC have engaged with intermediate trading partner regarding the grievance. LDC to monitor the progress
17	Prosper Group	Deforestation by Bewani Oil Palm Plantation Project (BOPPL), Papua New Guinea	Chain Reaction report: "Shadow Companies Present Palm Oil Investor risks and Undermine NDPE Efforts"	Exposure via AAK, CCFT, FIOP, IOI, Keckseng, Mewan, Sime Darby (H1 2019) Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners. LDC has engaged directly with Prosper Group regarding their policy and potential compensation/remediation despite the shareholder divestment of BOPPL. Prosper Group are working with Earthworm Foundation, with LDC following progress. Prosper Group's latest progress was published on 3rd Sep 2019 (http://www.prosper.com.my/news/Prosper%20Management%20Update2.pdf)

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18	Double Dynasty Group	Deforestation, land conflict - Double Dynastay Palm Oil Mill Radiant Lagoon Sdn Bhd Mutiar Pelita Genaan Plantation Sdn Bhd	Mighty Earth Rapid Response Report	Exposure via Sime Darby. Monitoring engagement made by trading partner, who sources from a company with 1 common shareholder. For update, see http://www.simedarbyplantation.com/sites/default/files/SDO%20Supplier%20Grievance%20Register%2006012020.pdf
19	REPSA/Grupo HAME	River contamination, human rights abuses, corruption	Various NGO / media reports	LDC and Earthworm Foundation are actively engaging REPSA with monthly calls to monitor progress. LDC conducted a field visit in Feb 2019. REPSA issue regular public sustainability report updates and have recently been audited by Oxfam / Earthworm on the grievance process and procedures. REPSA have several workstreams in place to address previous governance, environmental and social issues.
20	Rimbunan Hijau Group	Peat clearance by Gilford LTD, PNG Eastern Eden Estate, MLY Deforestation - LPF/0024 (Jaya Tiasa Holdings Bhd)	Greenpeace report: "Final Countdown"; Mighty Rapid Response Report	Exposure via IOI Not on LDC's approved purchase list. LDC is monitoring updates from intermediate trading partners as to the engagement progress. A moratorium is in place during the intermediate trader's engagement process. LDC is communicating non-approval list to trading partner.
21	Salim/IndoAgri	Labour violations PT PP Lonsum Sumatra PT Agro Subur Permai	Rainforest Alliance Network report: Human Cost of Conflict Palm Oil" Mighty Rapid Response Report	PT ASP is not in the LDC supply chain (H1 2019). Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
22	Samling/Glenealy Plantations	Deforestation, land grabs, indigenous rights violations, and environmental concerns by Myanmar Stark Prestige Plantation	A coalition of Burmese civil society groups report: "Green Desert"	Exposure from Genting, IOI (H1 2019) Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
23	Shin Yang Group	Deforestation of - Linau Sinar Sdn Bhd; - LPF/0018; - Dataran Linau Sdn Bhd; - Dataran Seping Sdn Bhd.	Mighty Earth Rapid Response Report	Exposure via AsiaOils - SOPB LDC has engaged the SOPB. LDC was instrumental in persuading SOPB to launch their NDPE Policy. This was launched in Feb 2019, and SOPB suspended all development of forest since 1 July 2018, unless HCV-HCS undertaken. SOPB has its own board of directors and claims to operate independently of Shin Yang. On 9th July 2019, SOPB visited Linau Sinar Sdn Bhd to insist on moratorium on new clearing and verification audit for the alleged clearing. A follow up session will be scheduled in 3 months time. For LPF/0018 , the alleged clearance had taken place at License for Planted Forest (LPF) area which was outside their oil palm plantation area. For Dataran Linau , the alleged clearance has happened outside their concession. The concession map has been shared with SOPB and we are awaiting a copy. For Dataran Seping , reported company had confirmed that the alleged clearance had taken place inside its concession area. However, based on ground verification, the clearance reported was found to be due to encroachment by some local communities for the purpose of paddy planting. As the clearance activity is considered as encroachment, the reported company had met the local communities on 10/11/2019 to highlight the issue in order to prevent future encroachment inside its concession area.
24	Sungai Budi/Tunas Baru Lampung	Peat clearance and ongoing government investigations on PT Samora Usaha Jaya	Chain Reaction report: "Tunas Baru Lampung"	Exposure via ICOF Not on LDC's approved purchase list. This has been communicated to relevant intermediate trading partners.
25	STH Group	PT Makmur Bersama Asia	Mighty Earth Rapid Response Report	LDC engaged with trading partner. Our trading partner has verified the evidence and confirm that the alleged development is not within the concession area of the supplier.
26	Tabung Haji	Peat clearance: - PT Persada Kencana Prima; - Hydroflow Sdn Bhd; - Ladang Tabung Haji; - TH Pelata Meludam	Chain Reaction report: "TH Plantations and PT Synergy Oil Nusantara" Mighty Earth Rapid Response Report	Exposure via AAA, AAK, ADMInt, BAT, Cargill, CCFI, Genting, ICOF, IOI, Keckseng, Mewah group, SimeDarby, Wilmar (H1 2019) Not on LDC's approved purchase list. This has and will be be communicated to relevant intermediate trading partners. All the alleged mills are not in the LDC supply chain, but other mills in group are present via indirects. Our trading partner confirm that the alleged deforestation is located outside their concession area and verified its evidence.

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27	Tradewinds Plantation	Peat forest development by Trans Kenyaland Sdn Bhd	Mighty Earth Rapid Response Report	Exposure via IOI, Keckseng, Mewah, Wilmar LDC engaged with trading partner. Our trading partner has verified the evidence and confirm that the alleged development is not within the concession area of the supplier.
28	Tsani Hutani Abadi Group	Deforestation by - PT Kruing Lestari Jaya; - PT Rayatama Jaya; and - PT Harapan Rimba Jaya	Several Mighty Earth Rapid Response Reports	Not on LDC's approved purchase list. This is being communicated to relevant direct suppliers.
29	WINGS	Peat clearance by PT Indopenta Sejahtera Abadi (PT ISA)	Mighty Earth Rapid Response	PT ISA responded with a written statement that the area cleared was not peat or primary forest, based on analysis of Ministry land maps, peat restoration agency and soil analysis). The written statement is available on request and is being considered.
30	Multiple Suppliers in Tesso Nilo National Park	Forest clearance of PT Tribakti Sarimas, PT Inti Indosawit Subur - Ukui II, PT Makmur Andalan Sawit, PT Cipta Riau Sarana, PT Berlian Inti Mekar - Rengat, PT Sawit Mas Nusantara, PT Peputra Supra Jaya, PT Sugih Riesta Jaya in Tesso Nilo National Park	Eyes of the Forest Report: "Enough is Enough"	Exposure via multiple trading partners LDC has been monitoring updates from intermediate trading partners as to the engagement progress. The targeted mill has been enrolled in the partners' Collaboration for Transformation (CFT) or Traceability to Plantation programmes.

Direct: refers to supply going directly to the **2 LDC Indonesia Refineries**

Indirect: refers to other traded oil, which is **not** sourced for the refineries but for the LDC Singapore Commercial trading arm

Note that LDC has the following criteria when considering grievances:

- a) Grievances are considered at a Group level, so grievances carried out at one mill/plantation incur an evaluation to the group as a whole
- b) For suppliers who are removed from an LDC approved supplier list, this applies to both buy **and** sell physical transactions
- c) For suppliers removed from an LDC approved supplier applies to all commodities LDC is involved in. There have been several cases where a different LDC product line has ceased trading with a supplier due to the supplier's poor performance in palm.