Particulars
About Your Organisation

Organisation Name
Wilmar International Ltd

Corporate Website Address
http://www.wilmar-international.com/

Primary Activity or Product
- Oil Palm Growers
- Processor and/or Trader

Related Company(ies)
No

Membership

<table>
<thead>
<tr>
<th>Membership Number</th>
<th>Membership Category</th>
<th>Membership Sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-0017-05-000-00</td>
<td>Ordinary</td>
<td>Palm Oil Processors and/or Traders</td>
</tr>
</tbody>
</table>
Oil Palm Growers

Operational Profile

1.1 Please state your main activities as a palm oil grower

- Palm oil grower & miller

Operations and Certification Progress

2.1.1 Total landbank licensed / owned (ha)
205,669.00

2.1.2 Total landbank for oil palm cultivation (ha)
184,646.00

2.1.3 Total land managed for conservation that is set aside (ha)
21,023.00

2.2.1 Mature area (ha)
155,038.00

2.2.2 Immature area (ha)
16,759.00

2.2.3 Total area of estate plantations - planted (ha)
171,797

2.3.1 Area certified (ha)
139,074

2.3.2 Number of estates/Management Units
62

2.3.3 Number of estates/Management Units certified
33

2.4.1 Indonesia - Please indicate which province(s)

- Bengkulu
- Jambi
- Kalimantan Barat
- Kalimantan Tengah
- Riau
- Sumatera Barat
- Sumatera Selatan
- Sumatera Utara
2.4.2 Malaysia - please indicate which state(s)

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2.4.3 Other - please indicate which country(ies)

Ghana, Nigeria

2.5.1 Do you have smallholders as part of your supply base?

Yes

2.5.2 Schemed

- Schemed
  Area of "Schemed" smallholder plantations - planted: 31,666.00 ha
  Area of "Schemed" smallholder plantations - certified: 7,191.00 ha

- Independent
  Area of "Independent" smallholder plantations - planted: 21,323.00 ha
  Area of "Independent" smallholder plantations - certified: 0.00 ha

- Others
  Other forms of smallholder operations that supply your organization: Outgrower
  Area of other form of smallholder plantations - planted: 2,201.00 ha
  Area of other form of smallholder plantations - certified: 1,800.00 ha

2.6.1 Area planted in this reporting period

1013.22

2.6.2 Have New Planting Procedures notifications been submitted to the RSPO for plantings this year?

Yes

2.7.1 Do you source for FFB from third parties i.e. FFB that is not sourced from your own plantation(s), scheme smallholders or contracted outgrowers?

Yes

Amount of outside FFB purchased from sources that are not company, scheme smallholders or contracted outgrowers 3,524,428.00 Tonnes

Amount that is RSPO-certified? -

2.8.1 Number of Palm Oil Mills operated

35
2.8.2 Number of Palm Oil Mills certified
13

2.8.3 Number of Palm Kernel crushers and/or Palm Kernel mills operated
--

2.8.4 Number of Palm Kernel crushers and/or Palm Kernel mills certified
--

2.9.1 Total annual Crude Palm Oil production capacity (tonnes)
1,356,000.00

2.9.2 Total annual Palm Kernel production capacity (tonnes)
326,000.00

2.9.3 Total annual Palm Kernel Oil production capacity (tonnes)
--

2.9.4 Total annual FFB processing capacity (tonnes)
7,136,000.00

Supply Chain Used

3.1 Which supply chain options do you sell RSPO-certified palm oil products through?

- Book & Claim
- Mass Balance

Time-Bound Plan

4.1 Date of first RSPO estate certification (planned or achieved)
2010

4.2 Time-bound plan - Year expected to achieve 100% RSPO certification of estates
2016

Comment:
Plan to complete certification audits by 2016. This TBP does not include Nigeria operations.

4.3 What are your interim milestones towards achieving RSPO certification commitment (year and progressive CSPO%) - please state annual targets/strategies
--
4.4 Timebound plan - Year expected to achieve 100% RSPO certification of associated smallholders and outgrowers

2019

Comment:
Note that a large proportion of previously schemed/plasma smallholders became independent smallholders in 2015. Due to this, previously certified schemed/plasma smallholders will need to attain RSPO Independent Smallholder Certification in order to continue to be recognized as RSPO certified.

See 4.6

4.5 What are your interim milestones towards achieving this RSPO certification commitment (year and progressive CSPO%) - please state annual targets/strategies

Smallholders that continue to be schemed or in plasma with Wilmar will be certified as per TBP for Indonesia. All schemed smallholders in Ghana have already been RSPO certified.

4.6 Time-Bound plan - Year expected to achieve 100% RSPO certification of independently sourced FFB

2029

Comment:
Note that a large proportion of previously schemed/plasma smallholders became independent smallholders in 2015. Due to this, previously certified schemed/plasma smallholders will need to attain RSPO Independent Smallholder Certification in order to continue to be recognized as RSPO certified.

We are working with various external agencies, including IDH, the RSPO Smallholder Support Fund; buyer & financing partners, and implementing organizations to enable independent smallholder certification as far as possible.

4.7 What are your interim milestones towards achieving this RSPO certification commitment (year and progressive CSPO%) - please state annual targets/strategies

--

4.8 Which countries that your organization operates in do the above commitments cover?

- Ghana
- Indonesia
- Nigeria

Concession Map

5.1 With regards to the GA resolution 6g that call for map submission by ACOP 2014 deadline. Please upload your estate location concession maps in KML or SHP format here: (RSPO General Assembly resolution 6g calling for map submissions by ACOP 2014 deadline)

Uploaded files:
- ghana_bopp_wgs84.zip
- nigeria_wgs84.zip
- shp-indonesia.zip
Map data declaration

I hereby declare that map data submission represents 100% of an oil palm growers’ concession sites (both RSPO certified and uncertified)

Comment:

The maps do not include Biase estate in Nigeria, as this estate is still undergoing finalization of the boundary.

Please state if any concession sites have been recently acquired or if any concession sites have changed ownership since the previous ACOP submission

PT Citra Riau Sarana (mill and estates) was sold in 2014.

GHG Emissions

6.1 Are you currently assessing your operational GHG emissions?

Yes

6.1.1 What GHG assessment tool or method are you currently using?

RSPO PalmGHG

Note:

For 6.2, this number is the average value for our certified mills in Indonesia and Ghana. For Indonesia, this consists of calculations done for 10 out of 15 of our certified mills.

For 6.3, this number is not yet available and will only be applicable to operations in Nigeria

6.1.2 When do you plan to start assessing your operational GHG emissions in line with the requirements of C5.6?

--

6.2 What is your operational GHG emission value (tCO2e/tCPO)? (refer to P&C C5.6)

1.22

6.3 What is the projected GHG emission associated with your new plantation development(s) (tCO2e)? (refer to P&C C7.8)

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Actions for Next Reporting Period

7.1 Outline actions that you will take in the coming year to advance your plans for certification

Continued certification of all remaining mills in Indonesia.
Completion of boundary finalization for operations in Nigeria to enable certification process to start.

7.2 Outline actions that you will take to promote CSPO along the supply chain

Wilmar is working with our FFB supply base in pursuing RSPO certification as well as implementation of the Wilmar No Deforestation, No Peat, and No Exploitation policy.

Reasons for Non-Disclosure of Information

8.1 If you have not disclosed any of the above information, please indicate the reasons why

Other

Conflict and Complaints Mechanism
9.1 Has your Company put in place any mechanism to resolve any conflict?

Uploaded files:


Mechanism details to resolve conflicts.

Wilmar believes that stakeholders play an important and constructive role in enhancing the transparency of its supply chain and in the implementation of its No Deforestation, No Peat and No Exploitation Policy. For this reason, we have set up a Grievance Procedure to enable any stakeholder to raise grievance against our own operations or that of our third-party suppliers. All grievances logged under the Grievance Procedure will be dealt with in a timely manner, the investigations and findings will be reported transparently.

For more information, please see http://www.wilmar-international.com/sustainability/grievance-procedure/

9.2 Has your company any ongoing land conflict?

Uploaded files:


Ongoing land conflict.

The case pertaining to PT Permata Hijau Pasaman 1 is tracked on the following webpage http://www.rspo.org/members/complaints/status-of-complaints/view/76

Wilmar has cooperated fully with the investigation and the RSPO in regards to the case. While the RSPO Complaints Panel’s preliminary decision had cleared Wilmar of the allegations, this decision has been disputed by the complainant. Wilmar continues to cooperate with the due process.
Palm Oil Processors and Traders
Operational Profile

1.1 Please state your main activity(ies) within the supply chain

- Refiner of CPO and CPKO
- Post-refinery processor
- Trader
- Biofuel producer
- Animal feed supplier

1.2 Operation and Certification Progress

1.2.1 Do you have a system for calculating how much palm oil and palm oil products you use?
Yes

1.3 Total volume of all palm oil products handled in the year (Tonnes)

1.3.1 Total volume of Crude Palm Oil (CPO) handled in the year (Tonnes)
15,300,000

1.3.2 Total volume of Palm Kernel Oil (PKO) handled in the year (Tonnes)
1,680,000

1.3.3 Total volume of other Palm Oil Derivatives and Fractions handled in the year (Tonnes)
--

1.3.4 Total volume of all palm oil and palm oil derived products handled in the year (Tonnes)
--
1.4 Volume handled in the year that is RSPO-certified (Tonnes):

<table>
<thead>
<tr>
<th>No</th>
<th>Description</th>
<th>Crude Palm Oil (Tonnes)</th>
<th>Palm kernel oil (Tonnes)</th>
<th>All other palm-based derivatives and fractions handled in the year that is RSPO-certified (Tonnes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4.1</td>
<td>Book &amp; Claim</td>
<td>100,000.00</td>
<td>8,000.00</td>
<td>-</td>
</tr>
<tr>
<td>1.4.2</td>
<td>Mass Balance</td>
<td>78,741.00</td>
<td>64,692.00</td>
<td>18,500.00</td>
</tr>
<tr>
<td>1.4.3</td>
<td>Segregated</td>
<td>50,884.00</td>
<td>136.00</td>
<td>-</td>
</tr>
<tr>
<td>1.4.4</td>
<td>Identity Preserved</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>1.4.5</td>
<td>Total volume of Oil Palm handled that is RSPO-certified:</td>
<td>229,625.00</td>
<td>72,828.00</td>
<td>18,500.00</td>
</tr>
</tbody>
</table>

What is the percentage of certified sustainable palm oil in the total palm oil your company sells in:

- Europe --%  
- India --%  
- China --%  
- South East Asia --%  
- North America --%

What is the percentage of certified sustainable palm kernel oil in the total palm kernel oil your company sells in:

- Europe --%  
- India --%  
- China --%  
- South East Asia --%  
- North America --%

Time-Bound Plan

2.1 Date of first supply chain certification (planned or achieved)

2010

2.2 Time-bound plan - Year expected to achieve 100% RSPO certification of all supply chains

2020

2.3 What are your interim milestones towards achieving this RSPO certification commitment (year and progressive CSPO%)? Please state annual targets/strategies.

By end of 2015, we aim to achieve RSPO SCCS for our major load-ports in Indonesia and Malaysia. Beyond 2015, we will review and adjust our progress accordingly as market conditions warrant.

2.4 Timebound plan - Year expected to only "handle/supply" RSPO certified oil palm products

2025

2.5 What are your interim milestones towards achieving this RSPO certification commitment (year and progressive CSPO%)? Please state annual targets/strategies.

-
2.6 How do you promote RSPO and RSPO certified sustainable palm oil to your customers proactively?

We hold sustainability meetings/discussions with customers and suppliers which included overview RSPO, certification standards (the positive environmental and social attributes); the various supply chain options and the benefits of buying CSPO. We are also encouraging the financial community to review their policy on their palm oil clients to upgrade requirements from mere RSPO membership to certification achievement within a reasonable timebound plan. We are working on initiatives to help independent smallholders achieve certification and thereafter, linking their certified volumes to the end markets.

GHG Emissions

3.1 Are you currently assessing the GHG emissions from your operations?

Yes

3.2 Do you publicly report the GHG emissions of your operations?

No

Please explain why

RSPO supply chain certification does not require GHG emission reporting. We have calculated GHG emissions for ISCC certification for a number of refineries; these are not made publicly available outside of ISCC certification.

Actions for Next Reporting Period

4.1 Outline actions that you will take in the coming year to promote CSPO use along the supply chain

We will continue to hold sustainability-themed engagement with our key stakeholders, especially suppliers, customers and bankers/investors to promote the production and uptake of sustainable palm oil

Plan is underway to collaborate with civil society organisations and financial institutions to help independent smallholders towards RSPO certification and linking them to end-user markets.

Reasons for Non-Disclosure of Information

5.1 If you have not disclosed any of the above information please indicate the reasons why

Some questions are commercially sensitive

Application of Principles & Criteria for all members sectors

6.1 Related to your sourcing, do you have (a) policy/ies, that are in line with the RSPO P&C such as:

- Water, land, energy and carbon footprints
  P-Policies-to-PNC-waterland.pdf
- Land Use Rights
  P-Policies-to-PNC-landuseright.pdf
- Ethical conduct and human rights
  P-Policies-to-PNC-ethicalconducthr.pdf
- Labour rights
  P-Policies-to-PNC-labourrights.pdf
- Stakeholder engagement
  P-Policies-to-PNC-stakeholderengagement.pdf

6.2 Where relevant, what prevents you from trading/processing only CSPO?

Being a mid-stream to down-stream player, the trading and processing of CSPO is dependent on market demand. Moreover, there is insufficient supply of CSPO in the market.

Commitments to CSPO uptake
As you don't source 100% CSPO through physical supply chains (IP/SG/MB), please answer the following questions: Do you have plans to?

No

Please explain why:

Being a mid-stream to down-stream player, the trading and processing of CSPO is dependent on market demand.

7.1. Do you have plans to immediately cover the gap using Book & Claim?

No

Please explain why:

--

Concession Map

Do you agree to share your concession maps with the RSPO?

No

Please explain why: --
Challenges

1 What significant economic, social or environmental obstacles have you encountered in the production, procurement, use and/or promotion of CSPO and what efforts did you make to mitigate or resolve them?

Many suppliers who are yet members of the RSPO and customers who have not started buying CSPO may still not be convinced of the value of the RSPO, especially since RSPO continues to be undermined by some NGO detractors. Furthermore, there are a number of certification schemes in the market which stakeholders can choose according to their preference, e.g. ISCC, ISPO, Rainforest Alliance Certification etc.

Furthermore, certification may be resource-inhibitive, requiring a lot of time, monetary and human resources. For example, the setting aside of HCV land which is an opportunity cost, hiring of personnel to manage HCV areas, HCV compensation requirements for new and potential RSPO members etc. While our Group has accepted this as part of the cost of doing business today, we work closely with the relevant government departments and other institutions to find ways to better manage and protect these areas.

2 How would you qualify RSPO standards as compared to other parallel standards?

- Cost Effective:
  - No

- Robust:
  - Yes

- Simpler to Comply to:
  - No

3 How has your organization supported the vision of RSPO to transform markets? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

Yes, we contributed human and monetary resources to support many of RSPO's initiatives; regularly engage with stakeholders to support the RSPO as well as participate in six working groups and one smallholder fund panel. We also collaborated with with multi-stakholders, including civil society organisations and end-user markets to support independent smallholders towards RSPO certification.

Last but not least, we built on the RSPO P&C standards to adopt a Sustainability Policy that is not only applicable to our own operations but to the entire supply chain, including subsidiaries, joint ventures & affiliates (regardless of shareholdings) and third-party suppliers.

4 Other information on palm oil (sustainability reports, policies, other public information)

1) No Deforestation, No Peat and No Exploitation Policy ("Policy")
2) Quarterly Updates on Policy implementation progress
3) Sustainability Reports
4) Dashboard which features traceability performance and supplier lists and Grievance Procedure