### Particulars

#### About Your Organisation

1.1 **Name of your organization**

Wilmar International Limited

1.2 **What is/are the primary activity(ies) or product(s) of your organization?**

- [✓] Grower
- [✓] Processor and/or Trader
- [ ] Consumer Goods Manufacturer
- [ ] Retailer and/or Wholesaler
- [ ] Bank and/or Investor
- [ ] Social and/or Development NGO
- [ ] Environmental and/or Conservation NGO
- [ ] Supply Chain Associate
- [ ] Affiliate

1.3 **Membership number**

2-0017-05-000-00

1.4 **Membership category**

Palm Oil Processors and/or Traders

1.5 **Membership sector**

Ordinary
# 1. Operational Profile

1.1 Please state your main activities as a palm oil grower:

- [ ] Oil palm grower without palm oil mill
- [x] Oil palm grower with palm oil mill
- [ ] Oil palm grower with palm oil mill and palm kernel crushing plant
- [ ] Smallholder Group Manager

# 2. Operations and Certification Progress

## 2.1 Land area controlled and managed associated to palm oil

2.1.1 Please state the number of palm oil estates controlled or managed

81.00

2.1.2 Total land controlled or managed for oil palm cultivation - planted (hectares)

245,460.71

2.1.3 Total land controlled or managed for oil palm cultivation - unplanted (hectares)

6,595.15

2.1.4 Total land designated and managed as HCV areas (hectares)

26,832.32

2.1.5 Other conservation areas set aside excluding HCV areas reported in 2.1.4

15,483.96

2.1.6 Total land under Scheme/Plasma smallholders certified (hectares)

3,689.79

2.1.7 Total land under Scheme/Plasma smallholders uncertified (hectares)

39,126.78

2.1.8 Total land area controlled/managed for oil palm cultivation

337,188.71

## 2.2 Certification progress:

2.2.1 Number of management units certified under RSPO P&C Certification

25.00
2.2.2 Total certified area under RSPO P&C Certification

229,294.52

2.3 In which countries are your estates located?

2.3.1 Indonesia - Please indicate which province(s)

Bengkulu, Central Kalimantan, Jambi, North Sumatra, Riau, South Sumatra, West Kalimantan, West Sumatra

2.3.2 Malaysia - Please indicate which state(s)

Sabah, Sarawak

Other:

Ghana, Nigeria

2.4 New plantings and development (excluding replanting):

2.4.1 New area planted in this reporting period (hectares)

0.00

2.4.2 Did you submit any New Planting Procedures (NPP) notifications to RSPO this year?

No

2.4.2.1 For plantings undertaken in this reporting period, have NPPs been submitted previously?

No

2.4.2.2 How many NPP notifications have been submitted to RSPO during this reporting period?

0.00

2.4.2.3 Please explain why NPP notifications have not been submitted to RSPO for the year or in the previous year for plantings undertaken in this reporting period?

There are no new planting undertaken in this reporting period

2.5 Supply of Fresh Fruit Bunches (FFB)

2.5.1 Please choose from the list below if you have smallholders and/or outgrowers as part of your supply base?

- Scheme/Plasma smallholders
- Independent smallholders
- Outgrowers
- Other third-party suppliers

2.5.2 Scheme/Plasma smallholder operations that supply your organisation:
<table>
<thead>
<tr>
<th>Section</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.5.2.1 Scheme/Plasma Smallholder total FFB volume that is supplied</td>
<td>476,525.35</td>
</tr>
<tr>
<td>2.5.2.2 Scheme/Plasma Smallholder FFB volume supplied that is certified</td>
<td>51,178.83</td>
</tr>
<tr>
<td>2.5.3 Independent smallholder operations that supply your organisation:</td>
<td></td>
</tr>
<tr>
<td>2.5.3.1 Independent Smallholder Total FFB volume that is supplied</td>
<td>225,928.96</td>
</tr>
<tr>
<td>2.5.3.2 Independent Smallholder FFB volume supplied that is certified</td>
<td>8,403.15</td>
</tr>
<tr>
<td>2.5.4 Outgrower operations that supply your organisation</td>
<td></td>
</tr>
<tr>
<td>2.5.4.1 Outgrower total FFB volume that is supplied</td>
<td>1,472,629.79</td>
</tr>
<tr>
<td>2.5.4.2 Outgrower FFB volume supplied that is certified</td>
<td>1,708.01</td>
</tr>
<tr>
<td>2.5.5 Other 3rd party supplier operations that supply your organisation</td>
<td></td>
</tr>
<tr>
<td>2.5.5.1 Other 3rd Party Supplier total FFB volume that is supplied</td>
<td>3,461,338.91</td>
</tr>
<tr>
<td>2.5.5.2 Other 3rd Party Supplier FFB volume supplied that is certified</td>
<td>0.00</td>
</tr>
<tr>
<td>2.6 Fresh Fruit Bunches (FFB) processing and production operations</td>
<td></td>
</tr>
<tr>
<td>2.6.1 Number of palm oil mills operated</td>
<td>45.00</td>
</tr>
<tr>
<td>2.6.2 Number of palm oil mills certified under RSPO P&amp;C 2013</td>
<td>25.00</td>
</tr>
<tr>
<td>2.6.3 Total hourly FFB processing capacity (tonne FFB/hr)</td>
<td>2,290.00</td>
</tr>
<tr>
<td>2.7 Palm Kernel processing and production capacity</td>
<td></td>
</tr>
</tbody>
</table>
2.7.1 Number of palm kernel crushers and/or palm kernel mills operated
0

2.7.2 Number of palm kernel crushers and/or palm kernel mills certified under RSPO Supply Chain Certification (SCC)
0

2.7.3 Total hourly kernel processing capacity (tonne PK/hr)
0

3. Volume of RSPO-certified oil palm products

3.1 CSPO sold as RSPO-certified

3.1.1 CSPO sold as RSPO-certified - Identity Preserved (IP)
95,919.05

3.1.2 CSPO sold as RSPO-certified - Segregated (SG)
0.00

3.1.3 CSPO sold as RSPO-certified - Mass Balance (MB)
243,370.50

3.1.4 CSPO sold as RSPO-certified - Book and Claim (Credits)
1,593.00

3.1.5 Total CSPO sold as RSPO-certified
340,882.55

3.2 CSPO sold under other certification schemes
387,177.59

3.3 CSPO sold as conventional
28,681.26

3.4 Total CSPO
756,741.40

3.5 CSPK sold as RSPO-certified

3.5.1 CSPK sold as RSPO-certified - Identity Preserved (IP)
22,200.70
3.5.2 CSPK sold as RSPO-certified - Segregated (SG)
0.00

3.5.3 CSPK sold as RSPO-certified - Mass Balance (MB)
135,957.86

3.5.4 CSPK sold as RSPO-certified
158,158.56

3.6 CSPK sold under other certification schemes
0.00

3.7 CSPK sold as conventional
7,371.07

3.8 Total CSPK
165,529.63

4. Time-Bound Plan

4.1 Year of first RSPO P&C certification (planned or achieved)
2008

4.2 Year expected to achieve 100% RSPO certification of estates and mills.
2023

4.2.1 If target has not been met, please explain why.
Malaysia - new sites acquired in 2018
Indonesia - sites facing HGU issue
Ghana & Nigeria - sites going through NPP, and those passed NPP are pending mill being operational

4.3 Year expected to achieve 100% RSPO certification of Scheme/Plasma/Associated smallholders and Outgrowers.
2023

4.3.1 If target has not been met, please explain why.
Indonesia - sites facing HGU issue

4.4 Year expected to achieve 100% RSPO certification for all FFB, regardless of source.
2030

4.4.1 If target has not been met, please explain why.
Unable to indicate the year for independently sourced FFB to be 100% certified; as they are free to decide whether they will be RSPO certified or not

5. Concession Map
5.1 With regards to RSPO General Assembly resolution 6G that calls for members to submit maps of their concessions by ACOP deadline, please upload your estate location concession map(s) in Shapefile format.

Uploaded

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

Yes

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

None

6. GHG Footprint

6.1 Are you currently assessing your operational GHG footprint using the RSPO PalmGHG Calculator?

Yes

6.1.1 Please upload your publicly available report

File: --

6.1.1.1 OR please insert the URL to the GHG section of your corporate website.

Link: https://www.wilmar-international.com/sustainability

6.1.2 What method are you currently using to assess your operational GHG footprint?

-

6.2 GHG footprint

6.2.1 What is the average GHG footprint by - hectare (tCO2e/ha)?

9.26

6.2.2 What is the average GHG footprint by - tonne of crude palm oil (tCO2e/tCPO)?

2.82

6.3 What would be the key emission sources identified?

Crop production rate, fertiliser usage, product processing rate, POME emission, diesel usage.

6.4 What measures are currently being taken to reduce GHG emissions?

Timely fertilisation, methane capture project, use of biogas for electricity generation, reduce use of diesel

7. Actions for Next Reporting Period

7.1 Outline activities that you will undertake in the coming year to advance your certification efforts.

Wilmar will continue preparation for certification of all remaining mills and their supply base (i.e. own estate, scheme smallholders and outgrowers). We will continue to work with independent smallholders to facilitate RSPO certification, where possible.
7.2 Outline activities that you will undertake in the coming year to promote CSPO along the supply chain.

Wilmar is working with our FFB supply base in pursuing RSPO certification. For example, we are working on initiatives to help independent smallholders achieve certification, and thereafter, linking their certified volumes to the end markets. We are working closely with end user customers to create incentives for independent smallholder certification. Wilmar continues to lead/participate actively in all RSPO processes we are involved in. This includes the Smallholder Working Group, RSPO Smallholder Support Fund Panel, Biodiversity & HCV Working Group, Compensation Task Force, FFB Legality & Traceability Task Force, Trade & Traceability Working Group, and Human Rights Working Group.

8. Non-Disclosure

8.1 Information in the sections above are mandatory declarations in your ACOP. For confidentiality purposes, members may choose not to display volume data in Section 2 and Section 3 publicly; however, RSPO reserves the right to utilise the member’s data on an aggregate basis for sectoral and total analysis. Please check this box if the member chooses to have the data in Section 2 and Section 3 displayed publicly.

Yes - Display Publicly

9. Support for Oil Palm Smallholders

9.1 Are you currently supporting any oil palm Independent Smallholder groups?

Yes

9.2 How are you supporting them?

Technical support for best agricultural practices, support to achieve certification standards.

9.2.1 Do you have any future plans to support oil palm Independent Smallholders?


9.2.2 When do you plan to start supporting oil palm Independent Smallholders?

-

10. Challenges

10.1 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?

- Awareness of RSPO in the market
- Difficulties in the certification process
- Certification of smallholders
- Competition with non-RSPO members
- High costs in achieving or adhering to certification
- Human rights issues
- Insufficient demand for RSPO-certified palm oil
- Low usage of palm oil
- Reputation of palm oil in the market
- Reputation of RSPO in the market
- Supply issues
- Traceability issues
- Others
Other:

Certification is a costly affair, involving a lot of resources and time. For example, in the management of HCVs, much cost and effort are required to maintain it within our concessions. We have accepted this as part of the cost of doing business today and it is also for the greater good. We work closely with the relevant government departments and other institutions to find ways to better manage and protect these areas.

We have a significant portion of FFB supply coming from independent smallholders, it is challenging and not economically viable to facilitate RSPO certification for all independent smallholders. The recent issues with HGU for Indonesia operations, issues with CB and accredited have resulted in massive delays in RSPO certification within our own operation as well as those of external suppliers. However we recognize this as an important part of our supply chain, and currently working closely engaging with independent smallholders.

10.2 In addition to the actions already reported in this ACOP, how has your organisation supported the vision of RSPO to transform the market for sustainable palm oil in other ways?

- ✔ Engagement with business partners or consumers on the use of CSPO
- ✔ Engagement with government agencies
- ☐ Promotion of CSPO outside of RSPO venues eg trade workshops industry associations
- ✔ Promotion of physical CSPO
- ✔ Providing funding or support for CSPO development efforts
- ✔ Research & Development support
- ✔ Stakeholder engagement
- ✔ Others

Other:

Supporting jurisdiction-wide approaches to certification, e.g. Wilmar is part of the Sabah Jurisdictional Approach for Sustainable Palm Oil Steering Committee, which works to support the Sabah Government in achieving its vision of 100% RSPO-certified sustainable palm oil in the state by 2025.

10.3 Please add links to any other information from your organisation on your policies and actions on palm oil:

http://www.wilmar-international.com/sustainability/
Processor and/or Trader

1. Operational Profile

1.1 Please state your main activity(ies) within the palm oil supply chain. Please select the option(s) that apply to you.

- ✔ Refiner of CPO and PKO
- ✔ Trader with physical possession
- ✔ Trader without physical possession
- ✔ Palm kernel crusher
- ✔ Food and non-food ingredients producer
- ☐ Power, energy and biofuel
- ✔ Animal feed producer
- ✔ Producer of oleochemicals
- ✔ Distributor and wholesaler
- ☐ Other

Other:

2. Palm Oil and Certified Sustainable Palm Oil Use

2.1 Please include details of all operations using palm oil owned and/or managed by the member and/or all entities that belong to the group.

Refer Question 1 of Processor and/or Trader

2.1.1 In which markets do you sell goods containing palm oil and oil palm products?

Applies globally

2.2 Volumes of palm oil and oil palm products

2.2.1 Total volume of crude and refined palm oil handled/traded/processed in the year (tonnes)

N/A

2.2.2 Total volume of crude and refined palm kernel oil handled/traded/processed in the year (tonnes)

N/A

2.2.3 Total volume of palm kernel expeller handled/traded/processed in the year (tonnes)

N/A

2.2.4 Total volume of other palm-based derivatives and fractions handled/traded/processed in the year (tonnes)

N/A

2.2.5 Total volume of all palm oil and oil palm products used in the year (tonnes)

N/A
### 2.3 Volumes of palm oil and oil palm products certified

<table>
<thead>
<tr>
<th>Description</th>
<th>Crude and Refined Palm Oil</th>
<th>Crude and Refined Palm Kernel Oil</th>
<th>Palm Kernel Expeller</th>
<th>Other palm-based derivatives and fractions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.3.1 RSPO Credits from Mill / Crusher</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.3.2 RSPO Credits from Independent Smallholder</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.3.3 Mass Balance (MB)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.3.4 Segregated (SG)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.3.5 Identity Preserved (IP)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.3.6 Total volume (tonnes)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### 2.4 Volume sold in the year that is RSPO-certified (tonnes):

<table>
<thead>
<tr>
<th>Description</th>
<th>Crude and Refined Palm Oil</th>
<th>Crude and Refined Palm Kernel Oil</th>
<th>Palm Kernel Expeller</th>
<th>Other palm-based derivatives and fractions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.4.1 Mass Balance (MB)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.4.2 Segregated (SG)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.4.3 Identity Preserved (IP)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2.4.4 Total volume (tonnes)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### 2.4.5 How much RSPO-certified products have you sold under other schemes (tonnes)?

N/A

### 2.4.6 How much RSPO-certified products have you sold as conventional (tonnes)?

N/A

### 2.5 What is the percentage of Certified Sustainable Palm Oil in the total palm oil products sold by your company in the following regions:

#### 2.5.1 Africa

0%

#### 2.5.2 Oceania

0%

#### 2.5.3 Europe

0%
2.5.4 North America
0%

2.5.5 Latin America
0%

2.5.6 Middle East
0%

2.5.7 China
0%

2.5.8 India
0%

2.5.9 Indonesia
0%

2.5.10 Malaysia
0%

2.5.11 Rest of Asia
0%

3. Time-Bound Plan

3.1 Year of first supply chain certification (planned or achieved).
2010

3.2 Year started/expected to start to handle/trade/process any RSPO-certified palm oil and oil palm products.
2010

3.2.1 If target has not been met, please explain why.
-

3.3 Year expected to achieve 100% RSPO certification of all palm product processing facilities.
2020

3.3.1 If target has not been met, please explain why.
Time required for subsidiary manufacturing plants
3.4 Year expected to only handle/trade/process 100% RSPO-certified palm oil and oil palm products

2030

3.4.1 If target has not been met, please explain why.

Unable to indicate the year for externally sourced product to be 100% certified; as they are free to decide whether they will be RSPO certified or not

3.5 Which countries do these commitments cover?

Applies globally

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

We hold sustainability meetings with customers and suppliers which include overview of RSPO certification standards (the positive environmental and social attributes) and 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 RSPO membership to certification achievement within a reasonable time-bound plan. We are working on initiatives to help independent smallholders achieve certification and thereafter, linking their certified volumes to the end markets

4. Trademark Use

4.1 Do you use or plan to use the RSPO Trademark on your own brand products?

Yes

4.2 Please select the countries where you use or intend to apply the Trademark

China, Indonesia, Malaysia

4.2.1 Please state the year when you began or plan to begin to apply the Trademark

2015

4.3 Please explain why

- [ ] Challenging reputation of palm oil
- [ ] Confusion among end-consumers
- [ ] Costs of changing labels
- [ ] Difficulty of applying for RSPO Trademark
- [ ] Lack of customer demand
- [ ] Limited label space
- [ ] Low consumer awareness
- [ ] Low usage of palm oil
- [ ] Risk of supply disruption
- [ ] Others

Other:

5. Actions for Next Reporting Period
5.1 Outline activities that you will take in the coming year to promote the use of RSPO-certified palm oil and oil palm products along the supply chain.

We will continue to hold sustainability-themed engagements with our key stakeholders, especially suppliers, customers and bankers/investors to promote the production and uptake of sustainable palm oil. We are also working on a number of independent smallholder RSPO certification projects in collaboration with civil society organisations, financial institutions and end-goods manufacturers.

6. Non-Disclosure of Information

6.1 Information in the sections above are mandatory declarations in your ACOP. For confidentiality purposes, members may choose not to display volume data in Section 2 publicly; however, RSPO reserves the right to utilise the member’s data on an aggregate basis for sectoral and total analysis. Please check this box if the member chooses to have the data in Section 2 displayed publicly.

No - Redact volume data

7. Application of Principles & Criteria for all member sectors

7.1 Regarding your company’s sourcing, handling or trading, do you have organisational policies that are in line with the RSPO P&C? Select all relevant options.

7.1.A Water, land, energy and carbon footprints

File: --
Link: https://www.wilmar-international.com/sustainability/policies#ndpe-policy

7.1.B Land use rights

File: --
Link: https://www.wilmar-international.com/sustainability/policies#ndpe-policy

7.1.C Ethical conduct and human rights

File: --
Link: https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/human-rights-policyed16f04afc7043738e7579b103a3a15e.pdf?sfvrsn=9378b7f5_2

7.1.D Labour rights

File: --
Link: https://www.wilmar-international.com/sustainability/policies#ndpe-policy

7.1.E Stakeholder engagement

File: --
Link: https://www.wilmar-international.com/sustainability/policies#ndpe-policy

7.1.F None of the above. Please explain why.

-

7.2 What best practice guidelines or information has your organisation provided in the past year to facilitate the uptake of RSPO-certified sustainable palm oil and oil palm products? What languages are these guidelines available in?

None

8. Greenhouse Gas (GHG) Footprint

8.1 Are you currently reporting any GHG footprint?

Yes
8.1.1 Please upload your publicly available GHG report
File: --
Link: https://www.wilmar-international.com/sustainability/responsible-operations/reducing-greenhouse-gas-emissions

8.1.2 OR please insert the URL to the GHG section of your corporate website.
Link: https://www.wilmar-international.com/sustainability/responsible-operations/reducing-greenhouse-gas-emissions

8.2 Please explain and justify why you are not calculating your GHG footprint. Please include any future plans you may have to calculate your GHG footprint.

-

8.3 What methodology are you using to calculate your GHG footprint?
GHG Protocol

9. Support for Oil Palm Smallholders
9.1 Are you currently supporting any oil palm Independent Smallholder groups?
Yes

9.2 How are you supporting them?
Technical support for best agricultural practices, support to achieve industry and national certification standards

9.2.1 Do you have any future plans to support oil palm Independent Smallholders?

9.2.2 If yes, when do you plan to start your support for oil palm Independent Smallholders?

-

10. Challenges
10.1 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?

☐ Awareness of RSPO in the market
☐ Difficulties in the certification process
☐ Certification of smallholders
☐ Competition with non-RSPO members
☐ High costs in achieving or adhering to certification
☐ Human rights issues
☐ Insufficient demand for RSPO-certified palm oil
☐ Low usage of palm oil
☐ Reputation of palm oil in the market
☐ Reputation of RSPO in the market
☐ Supply issues
☐ Traceability issues
☐ Others
Other:

We have a significant portion of FFB supply coming from independent smallholders, it is challenging and not economically viable to facilitate RSPO certification for all independent smallholders. The recent issues with HGU for Indonesia operations, issues with CB and accredited have resulted in massive delays in RSPO certification within our own operation as well as those of external suppliers.

10.2 In addition to the actions already reported in this ACOP how has your organisation supported the vision of RSPO to transform markets in other ways?

- ✔ Engagement with business partners or consumers on the use of CSPO
- ✔ Engagement with government agencies
- □ Promotion of CSPO outside of RSPO venues eg trade workshops industry associations
- ✔ Promotion of physical CSPO
- ✔ Providing funding or support for CSPO development efforts
- ✔ Research & Development support
- ✔ Stakeholder engagement
- ✔ Others

Other:

Supporting jurisdiction-wide approaches to certification, e.g. Wilmar is part of the Sabah Jurisdictional Approach for Sustainable Palm Oil Steering Committee, which works to support the Sabah Government in achieving its vision of 100% RSPO-certified sustainable palm oil in the state by 2025

10.3 Please attach or add links to any other information from your organisation on your policies and actions on palm oil

https://www.wilmar-international.com/sustainability/policies