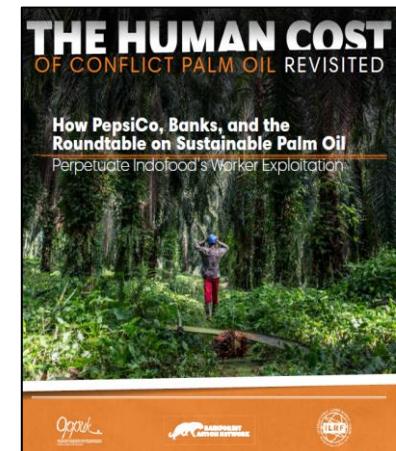
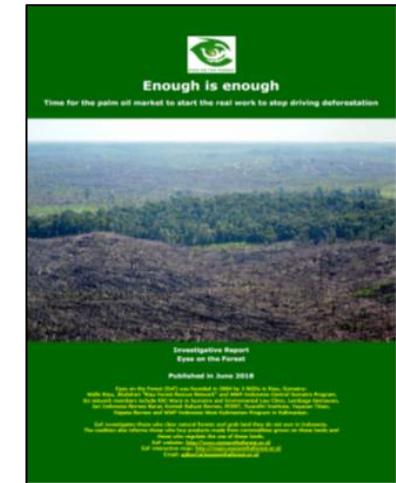


Unilever's Palm Oil Grievance Tracker Updated January 2, 2019

This document lists grievances that have been raised to Unilever with regards to our palm oil supply chain. Unilever defines a palm oil grievance as a complaint sent to Unilever about an alleged breach of our [Sustainable Palm Oil Sourcing Policy \(PDF | 167KB\)](#) and/or our [Responsible Sourcing Policy \(PDF | 9MB\)](#). Unilever works closely with our suppliers, grievance raisers, and other stakeholders to investigate and resolve issues within our supply chain in a timely, transparent, and effective manner.

A. Direct suppliers' with supply chain grievances 11		
	Supplier Name	References
1	ADM	A4, A6, B6, B16
2	Apical/Asian Agri	A4, A7, B15
3	Bunge LC/IOI	A1, A4, A6, A7, B6
4	Cargill	A4, A6, A7, B6, B9, B15, B16
5	Emami Agrotech	A9
6	GAR	A3, A4, A6, A7, B4, B5, B6, B14, B15
7	KLK	A2, A7, B16
8	Louis Dreyfus	A4, B16
9	Musim Mas	A4, A6, A7, B3, B4, B5, B6, B8, B10, B14, B15, B16
10	Sime Darby	A4, A6, A7, B16
11	Wilmar	A4, A5, A6, A7, A8, B4, B5, B6, B7, B9, B10, B11, B14, B15, B16

B. Third-party/indirect suppliers ² with supply chain grievances 31		
	Supplier Name	References
1	Agra Bumi Niaga	A6, B5
2	Anglo-Eastern Plantations	B11, B15
3	Austindo Nusantara Jaya	B4, B15, B16
4	Bintang Harapan Desa	B13
5	Best Group	B7
6	Bumitama	B15
7	CAA /First Resources	B10
8	Central Cipta Murdaya	B15
9	Citra Borneo Indah/PT SSMS	B2, B15
10	Djarum	B15
11	DTK Opportunity	B15
12	Felda, FGV, Felda-IFFCO	B1
13	GAMA/Ganda	A8, B15
14	Genting	B15
15	HSA Group	B12, B15, B16
16	IJM Corporation	B15
17	Indofood Agri (Salim)	B3
18	Indonusa	B15
19	Korindo	B15
20	Noble Group	B8, B15
21	NPC Resources	B15
22	Rimbunan Hijau	B15
23	Samling/Glenealy	B15
24	Sungai Budi Group/Tunas Baru Lampung	B15
25	Tabung Haji Plantations	B14, B15, B16
26	Tee family/Prosper group	B15
27	JA Wattie	B16
28	Musirawas	B16
29	REPSA	B9
30	Samuel	B16
31	Surya Panen Subur II	A6, B6



This grievance tracker represents the status of the listed grievances to the best of Unilever's knowledge at the time of its publication. Unilever relies on correspondence with its suppliers and grievance raisers as to the accuracy and correctness of the grievances raised by them and pursues resolution of all credible grievances. As such, references to grievances, supply chains and remediation steps below are all made on the assumption that information and grievances shared with Unilever are correct. Unilever is not endorsing or claiming as factually correct any accusation or grievance, notwithstanding that Unilever is investigating or is sharing external links to or details of any grievance or other matter. References to a commercial decision by Unilever to no longer to source palm oil from a supplier group should not be assumed to be a confirmation of fault of any kind. ¹Direct suppliers have a contract with Unilever and directly supply Unilever's palm oil. ²Indirect/ third-party suppliers do not have a contract with Unilever, but our direct suppliers are currently sourcing from or have previously sourced palm oil from them.

A. Grievances against direct suppliers

Direct suppliers have a contract with Unilever and directly supply Unilever's palm oil.

Ref.	Date first raised	Stakeholder	Subject matter of grievance allegation	Supplier(s) and palm oil link to Unilever SC	Latest Unilever and Unilever supplier actions to address grievance allegations
A9	November 2018	Chain Reaction Research	<p>Absence of NDPE policies allegation</p> <p>In November 2018, Chain Reaction Research reached out to Unilever with a draft of their report "Leakage Risks in India, 58 Percent of Palm Oil Imports Not Covered by NDPE Policies".</p> <p>Emami Agrotech, a refinery supplying to Unilever, is allegedly operating without a public NDPE policy, through which unsustainable palm oil may enter the Indian and Pakistani supply chains of Unilever.</p>	Emami Agrotech	<ul style="list-style-type: none"> Unilever engaged with Chain Reaction Research regarding the publication of the report (November 2018). Unilever has reached out to Emami Agrotech to understand their response on the report. We reiterated that Unilever's Sustainable Palm Oil Sourcing Policy applies to all our direct and indirect palm oil suppliers. We are investigating further whether the supplier is sourcing from palm oil companies who have been alleged and verified as being non-NDPE compliant (December 2018).
A8	June 2018	Greenpeace	<p>NDPE non-compliance allegation</p> <p>Greenpeace report titled, "Rogue Trader", alleges that Wilmar International is still linked to forest destruction especially in Papua through "GAMA Group", a group of palm oil companies owned and run by senior Wilmar executives and members of their family.</p> <p>GAMA/Ganda group is also included in the Greenpeace list of allegedly NDPE non-compliant companies for deforestation issues in the "Final Countdown" (see B15).</p>	Wilmar	<ul style="list-style-type: none"> Wilmar provided Unilever with a letter regarding its response to Greenpeace on the "Rogue Trader" report (June 2018). Wilmar has written to the suppliers allegedly linked to the "GAMA Group" to clarify the allegations. While seeking for clarification, Wilmar has ceased sourcing from these companies. Progress in the cases involving Wilmar's supply base can be found on Wilmar's grievance list. GAMA and AidEnvironment entered a collaborative agreement to develop and implement a sustainability policy framework. A full joint statement is provided here. The NDPE policy was released in September 2018.
A7	May 2018	Greenpeace	<p>NDPE non-compliance allegation</p> <p>In a letter to major palm oil buyers, Greenpeace listed alleged 26 NDPE non-compliant palm oil producer groups (May 2018).</p> <p>September 2018, Greenpeace published "Final Countdown," a report on the 26 companies previously reported, and the brands and traders' alleged non-implementation of NDPE commitments in the context of their entire palm oil supply chains.</p>	<p>Unilever's direct suppliers in the Greenpeace list:</p> <ul style="list-style-type: none"> Bunge/IOI Wilmar <p>The remaining companies in the list, while not direct suppliers to Unilever, may still be in the supply chain through Unilever's direct suppliers e.g. (not exhaustive):</p> <ul style="list-style-type: none"> Bunge/IOI Wilmar Sime Darby 	<ul style="list-style-type: none"> Unilever issued a response letter to Greenpeace, outlining views on the key challenges raised i.e. sourcing links with highlighted producer groups, NDPE compliance and verification, and multi-stakeholder approach for industry reform. The letter also included sourcing links and actions taken with regards to each supplier on the list (June 2018). Unilever reached out to direct suppliers in the list (Wilmar, Bunge/IOI) to better understand the NDPE non-compliance allegations raised by Greenpeace (June 2018). Unilever engaged independent consultants to identify which mills of the listed companies are in the Unilever's mills list, to get better clarity of how the listed companies may be within Unilever's supply chain (June 2018). Unilever issued a response to the Greenpeace campaign "Final Countdown". The response can be accessed here (September 2018). Unilever reached out to its major direct suppliers that source from companies in the list (i.e. Bunge/IOI, Wilmar, Sime Darby, KLK, GAR, Apical, Cargill, and Musim Mas) to identify each major supplier's position on the grievance and sourcing from the listed companies.

				<ul style="list-style-type: none"> • KLK • GAR • Apical • Cargill • Musim Mas <p>See B15.</p>	<ul style="list-style-type: none"> • Bunge responded to Greenpeace regarding the allegations against IOI connected to the Pelita case (see related grievances). Bunge responded that the Pelita case is well documented on several grievance lists (e.g. Bunge grievance list September 2018, IOI Group, RSPO). In September 2018, Bunge also issued a response to the “Final Countdown” report, which they communicated to Unilever. • Wilmar responded to Greenpeace with a document also shared with Unilever. Wilmar outlined engagements with the listed companies on their public grievance list. As a response to the “Final Countdown” report, Wilmar issued a public statement, which they also communicated to Unilever (September 2018). • GAR issued a letter to customers, including Unilever, outlining GAR’s sourcing from the listed groups. Details on GAR’s engagements with listed companies in their supply chain are available on their public grievance list. With regards to the “Final Countdown” report, GAR issued an advisory to its customers (September 2018). • GAR contacted Bumitama Agri with regards to Final Countdown report in September 2018 and in October 2018, GAR met Bumitama for an update. For further details, please see: http://bit.ly/2U9G9Qn and GAR Grievance List no. 4 (Bumitama) and no. 37 (IOI). • Cargill provided a response to Unilever and updated on engagements with their suppliers on the list. Engagements with listed companies are also on their public grievance logs. Cargill issued a statement to buyers responding to the “Final Countdown” report (September 2018). • On the Final Countdown report, IOI published its official statement (October 2018). • Musim Mas issued a response to Unilever. Engagements with the listed companies are also available on their public grievance list. • We have been informed that Apical is engaging directly with Greenpeace on these allegations. • Sime Darby and KLK issued a response to Unilever and they are working on these allegations. More information are outlined in Sime Darby’s Grievance Register and KLK’s Grievance List. • In December 2018, Wilmar and AidEnvironment issued a joint statement on a new supplier monitoring and engagement programme that will “accelerate its efforts towards a deforestation-free palm oil industry.” The statement is available on Wilmar’s website here. In response, Greenpeace is pausing its campaign to “give Wilmar space to put this plan into action.”
A6	November 2016	Rainforest Action Network (RAN)	<p>Deforestation in Leuser Ecosystem (Aceh) allegation</p> <p>RAN released a report "Protecting the Leuser Ecosystem" (2016) alleging illegal deforestation of elephant habitat within the Leuser Ecosystem and mills in the Singkil Bengkung area that are allegedly at risk for sourcing “Conflict Palm Oil”.</p> <p>The Rainforest Action Network (RAN) through the Leuser Watch campaign published a report alleging that the palm oil company PT Surya Panen Subur II (PT SPS</p>	<p>Unilever does not have any direct business relationship with PT Surya Panen Subur II (PT SPS II).</p> <p>Mills of PT SPS II are included in the Universal Mill List of Unilever’s extended supply chain, and have been alleged to</p>	<ul style="list-style-type: none"> • Unilever has been engaging with RAN and major direct suppliers on this grievance. • In 2016, Wilmar, GAR, Musim Mas, Apical with stakeholders including The Forest Trust (TFT) and Rainforest Action Network (RAN) earmarked Aceh Singkil and Aceh Tamiang of the Leuser Ecosystem as the area of first priority for the landscape approach “Areal Prioritas Transformasi (APT). These APT areas were included in a deforestation monitoring initiative developed by TFT and partners. • GAR and PT SPS II agreed on site visits, action plan, progress updates and next steps, one of which was to conduct participatory mapping that was also carried out (October 2016). • Musim Mas does not list SPS II in their grievance list but have engaged with multiple other suppliers (Pati Sari, Sisirau, Mopoli Raya, Ensem Sawita, Ensem Lestari, Bangun

			<p>II) was responsible for the destruction of thousands of hectares of the Tripa peat land/forest in Aceh. Initial findings were found in 2014. PT SPS was found guilty by the State Prosecutor’s Office of clearing of peat forests (2016). In a May 2018 case study, RAN has further reported allegations that there continues to be evidence of deforestation occurring in January and March 2018 during which heavy machinery was used to clear forest for palm oil development, and in some cases the use of fire.</p> <p>A related grievance for a third-party supplier PT ABN is presented in B5.</p>	<p>be potentially in the supply chain directly or indirectly of the following Unilever direct suppliers:</p> <ul style="list-style-type: none"> • GAR • Wilmar • Cargill • Bunge Loders Croklaan • Sime Darby • Musim Mas • ADM 	<p>Sempura Lestari; suppliers in Singkil Regency). In August 2017, Ensem Sawita (supplier to Wilmar and Musim Mas) confirmed that all purchasing from PT ABN had ceased.</p> <ul style="list-style-type: none"> • Musim Mas engaged with Ensem Sawita, who has now committed to an action plan in collaboration with Musim Mas and GAR to ensure that its sustainability practices are in line with policy commitments. More information available on Musim Mas grievance list (September 2017). • GAR supported PT SPS in their Collaboration for Transformation (CFT) programme, which completed conflict resolution process implementation (December 2017). • GAR and SPS II discussed and agreed upon actions for conflict resolution, which included building and improving communication with “land clearing actors”, local, provincial, and international stakeholders, including RAN (June 2018). • A meeting was held between GAR and SPS II management, during which GAR asked for a more concrete solution for the ongoing deforestation caused by encroachment in SPS II concession (July 2018). More information on GAR grievance list. • Wilmar reported that PT SPS II has also been transparent in updating Wilmar regularly on their progress in addressing issues raised by RAN, and Wilmar continue to support PT SPS II in addressing challenges of alleged occupation on the unopened area, that was set aside under the moratorium. Wilmar has not sourced from PT SPS II since June 2018. Field verification by ministry officials (KLHK) and Wilmar’s meeting with PT SPS II took place (July 2018). Wilmar continues to follow up with PT SPS II on their progress in addressing the challenges of illegal occupation on the unopened area, that was set aside under the moratorium. More information available on Wilmar’s grievance list. • Wilmar and GAR are also engaged with other suppliers in associated grievances in the Leuser area e.g. PT Ensem Sawita, Patisari, PT Dua Perkasa Lestari, PT Agra Bumi Niaga, and Koperasi Prima Jasa. • Unilever reached out to direct suppliers to understand their sourcing relationships with PT SPS II. Most of Unilever’s direct suppliers have confirmed that they have ceased sourcing from PT SPS II, and one is halting new procurement and asking PT SPS II to create and execute a time-bound plan by the end of 2018 (October 2018). • ADM did not directly source from PT SPS II. ADM’s engagement with their direct suppliers is available on their Grievance Log (October 2018). • Bunge does not directly supply from the area but may be indirectly exposed through traders. More information is available on their Grievance List. • Surya Panen Subur II is no longer in Cargill’s supply chain. Cargill will be discussing with direct suppliers on milestones required for SPS II to demonstrate compliance with their policy. • Unilever has been in discussion with the IDH Sustainable Trade Initiative to support the Production-Protection-Inclusion jurisdictional compact and Verified Sourcing Area (VSA) program in Aceh that engages provincial and districts governments, palm oil growers, traders, and buyers to address systemic issues in the area. • GAR and Foresthints had a meeting to discuss next steps regarding the Foresthints reports (http://bit.ly/2Qv6KFm and http://bit.ly/2SQ9mit), and agreed on a joint field verification visit to the areas relevant to the grievance in SPS II concession. Results and
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					<p>recommendations from the verification visits are available on GAR Grievance List no. 60 (August 2018).</p> <ul style="list-style-type: none"> GAR and RAN had a meeting to discuss progress on SPS II. GAR informed RAN that due to the unsatisfactory progress on how SPS II delivered conflict resolution process as to the deforestation caused by encroachment in its concession, GAR had deemed SPS II to be non-compliant with GAR grievance handling process. For more information, please see GAR Grievance List no. 60 (November 2018).
A5	November 2016	Amnesty International	<p>Non-compliant labor and working conditions allegation</p> <p>Amnesty report titled “The Great Palm Palm Oil Scandal” reports allegations surrounding labor conditions in Wilmar’s direct and indirect operations (November 2016).</p> <p>Amnesty report alleges that Wilmar tried to intimidate staff into denying the claims, and urges the Indonesian Government to investigate labour practices (March 2017).</p>	Wilmar	<ul style="list-style-type: none"> Unilever issued a public response to the report (November 2016). Unilever has engaged with Amnesty International and Wilmar to discuss the allegations and action plans to take in 2017. Wilmar published an update on pushing for industry wide collaboration with Verite and BSR, and released an action plan for PT Perkebunan Milano and PT Daya Labuan Indah (April 2017). Internal investigation was carried out by the Wilmar Sustainability team (May 2017). Unilever participated in a BSR social sustainability workshop held by Wilmar for its main suppliers (November 2017). Wilmar released a 12-month progress report (December 2017). Wilmar issued an update that they are working with Verité to review and improve the living and working environment of their employees (February 2018). Amnesty sent a letter to major buyers of Wilmar regarding follow up action of the report (March 2018), to which Unilever replied with a public response (March 2018). Wilmar continued to engage with Amnesty International (June 2018). Wilmar issued a two-year progress report (November 2018).
A4	April 2016	Eyes on the Forest (EoF)	<p>Allegation of sourcing of FFB from national park encroachment in Riau</p> <p>Eyes on the Forest published “Enough is Enough” in June 2018, a report identifying 22 palm oil mills allegedly purchasing palm fruit bunch from alleged encroachments inside the Tesso Nilo National Park (TNNP) and Bukit Tigapuluh landscapes in Riau. Findings from 2017 investigation are combined with those from an earlier report, “No one is safe” published in 2016.</p> <p>The allegation also includes that crude palm oil from these mills was purchased by major palm oil traders and growers, such as the “Big 4” (Wilmar, Musim Mas, Golden Agri Resources, Apical and Asian Agri); eventually making its way to the supply chain of Unilever and other buyers with NDPE commitments.</p>	<p>Out of 22 mills around Tesso Nilo and Bukit Tigapuluh landscapes that are the subject of the grievance, 19 mills potentially supply to Unilever through our direct suppliers:</p> <ul style="list-style-type: none"> Wilmar Musim Mas Golden Agri Resources (GAR) RGE (Apical, Asian Agri). <p>Some Unilever suppliers do not directly source from the area, but palm oil within the scope of the</p>	<ul style="list-style-type: none"> Eyes on the Forest (EoF) sent an email to Unilever regarding the draft for EoF report titled “Enough is Enough”. EoF requested that Unilever provide comment or correction to the report. Unilever replied to EoF (May 2018). Asian Agri conducted a visit to PT Inti Indosawit Subur (Ukui 1), traced the reported supply chain, reviewed the supply report to confirm EoF data, and suspended the Delivery Order (DO) holder of a reported truck. Response available publicly here (May 2018). Unilever conducted an internal review of the grievance. Unilever and other brands also met with WWF to discuss the possible next steps (July 2018). Wilmar, in their Grievance List, identified three suppliers in their supply chain: Asian Agri, PT CRS, and PT SMN. Wilmar will continue to engage with PT CRS, and expected to conduct a ground verification (July 2018). Wilmar has ceased sourcing from PT CRS since June 2018. PT SMN rebutted the report and clarify that they do not source FFB from the TNNP. A field visit was carried out to assess the supplier’s operations (September 2018). A meeting was held between EoF and Wilmar, Musim Mas, GAR, Apical in Jakarta, in which an agreement on joint next steps was agreed by all present (July 2018). Unilever met with WWF, palm oil traders, and palm oil buyers to discuss potential collaboration in the Tesso Nilo area (November 2018). Apical is currently engaging with their six suppliers which are alleged to be receiving FFB from encroaching areas in 2018. Apical will be working together with the suppliers and

				<p>grievance might enter their supply chain through traders. These are:</p> <ul style="list-style-type: none"> • ADM • Cargill • Bunge Loders Croklaan/IOI • Louis Dreyfus • Sime Darby. 	<p>civil society group, Setara Jambi for a traceability to plantation project. The progress is made available on Apical's public grievances.</p> <ul style="list-style-type: none"> • Musim Mas conducted site clarifications and applied a controlled purchase process (reducing procurement from 14 mills to 5 mills in 2016). They are involved in various landscape initiatives in the area. Most recently, they conducted a traceability exercise at PT MAS and PT BIM, two mills mentioned in the report as supplying to Musim Mas. Grievance update available here. • GAR identified seven mills in the report in their supply chain. They conducted five site visits under the Aggregate Refinery Transformation programme and two under the grievance handling support process during 2015 – 2018. GAR and EoF discussed the report and action plans to engage five mills for the Collaboration for Transformation (CFT) programme focusing on traceability to plantation. (June 2018). • GAR and EOF had a meeting to discuss "Enough is Enough" report and action plan on landscape approach. For more information, please see GAR Grievance List no. 39 (July 2018). • GAR has conducted multiple site visits to the identified six mills under the Aggregate Refinery Transformation programme (TBS, SRJ, SMN, PAJ) and grievance handling support process (PSJ, MAS) in the period from 2015 to 2018. Please refer to GAR Grievance List no. 42, 48, 49, 53, and 54. GAR also engaged with PSJ and MAS in various capacity building events. Refer to GAR Grievance List no. 48 (July 2018). • GAR met PT MAS management to ask for a stronger commitment on TTP. PT MAS stated it had achieved 30% TTP as of October 2018 and agreed to reach 100% TTP by end of Q12019. PT MAS also welcomed GAR's plan to support them in achieving the full traceability to the plantation in CFT programme. For more information, please see GAR Grievance List no. 42 (October 2018). • ADM had clarified on their Grievance Log that they do not source directly from the area, and have engaged with the relevant suppliers to understand their suppliers' actions. • Cargill does not source directly from the area but receive oils through trading partners. More information on Cargill's engagements through its direct suppliers is available on Cargill's Grievance Log. Cargill advocates for its direct suppliers to collect traceability to plantation data in these areas and is engaged with other palm oil companies to pursue a landscape programme for sustainable palm oil in Siak and Pelalawan areas. • Bunge does not directly source from the area and is working closely with its suppliers to address allegations related to indirect exposure. • LDC does not directly source from the alleged mills in the report and is working closely with its immediate trading partner to address allegations related to indirect exposure. • To address high risk mills and better resource management in the area, Unilever is discussing potential partnership to support a landscape program partnering with the local governments, UNDP, Proforest, Daemeter, NGOs, palm oil growers, traders, and buyers.
A3	April 2015	Forest Peoples Programme	Alleged issue concerning land rights in new concessions	Golden Agri Resources (GAR)	<ul style="list-style-type: none"> • GAR released progress report (April 2016). • Unilever has engaged with FPP and GAR to discuss allegations and action plans to take in 2017.

		(FPP), LinkAR-Borneo	<p>Forest Peoples Programme published allegations in a statement entitled "Golden Agri-Resources still in violation of RSPO standards" (April 2015).</p> <p>Forest Peoples Programme published allegations in a joint statement of 43 Indonesian civil society organizations reporting alleged workers' rights abuses by PT Sawit Mas Sejahtera (Sinar Mas) in South Sumatra (July 2017).</p>		<ul style="list-style-type: none"> • GAR released progress report for April - June 2017 (June 2017). • Latest developments: RSPO to conduct review of the RACP process and review of the Company's HCV Management and Monitoring plan (May 2018). • GAR stated that it is continuing active dialogue with FPP. GAR referred to the RSPO grievance process, and updates can be found at the RSPO website. • GAR update to Unilever on the FPP statement: "Based on the progress made on the ground in PT KPC, specifically signed MOUs with all impacted communities and completion of land acquisition for plasma/smallholder development, GAR has formally requested the RSPO to close the case for monitoring, in October 2018. To date, we have not received any response from the RSPO Secretariat." • GAR update to Unilever on the Sawit Mas Sejahtera case: "A statement from GAR management was sent to all related stakeholders stating the dispute between PT SMS and SBPKS-GSBI labour union has been settled. This grievance is considered closed." For more information, please see GAR Grievance List no. 26 (July 2018).
A2	2014	Rainforest Action Network (RAN)	<p>Deforestation and human rights violations allegation</p> <p>2014 RAN report "Conflict Palm Oil in Practice" alleged deforestation and human rights abuses among various of KLK's operations. A follow up progress report in 2015 cited allegations of ongoing conflict with communities in Liberia, threatened social conflict and deforestation in Papua New Guinea, and unresolved labor and deforestation risks in its Indonesian and global operations.</p> <p>RAN recommended customers and financiers to require KLK to take a number of actions to address remaining risks (September 2016).</p> <p>KLK was also mentioned as having an alleged relative lack of progress in implementing NDPE commitments in Greenpeace's report "Still Cooking the Climate" (November 2017).</p>	Kuala Lumpur Kepong (KLK)	<ul style="list-style-type: none"> • KLK provided updates on actions taken (March 2016). • KLK had performed participatory mapping exercise in Liberia as reported in Sustainability Report (March 2017). • KLK commits to address issues raised by RAN (March 2017). • Unilever sent a letter to KLK in August 2017, followed by a meeting in Singapore in September 2017. • KLK provided updates to Unilever regarding grievances in their supply chain in August and November 2018. • KLK has reviewed and updated its Sustainability Policy, outlining timelines and deliverables to demonstrate the Group's environmental, social, traceability, governance, compliance, and monitoring commitments. The statement is available here (August 2018).
A1	2010	Greenpeace, Rainforest Action Network (RAN), Forest Peoples Programme, Grassroots coalition (<i>Pelita case</i>)	<p>Community rights and deforestation issues allegation</p> <ul style="list-style-type: none"> • IOI Pelita case was raised in 2010 to the RSPO complaint panel and lodged by 11 international and NGO Grassroots and the local Long Teran Kanan community in Sarawak (2010). • IOI concessions in Ketapang, West Kalimantan case raised in the RSPO complaint panel in 2015 a grievance related to alleged land clearing and illegal planting (2015). 	IOI Group After the acquisition of IOI by Bunge in 2018, Unilever's direct relationship goes mostly through Bunge Loders Croklaan.	<ul style="list-style-type: none"> • Unilever was one of the first consumer goods companies publicly to announce suspension of buying palm oil from IOI, after it was suspended by the RSPO (March 2016). • IOI and AidEnvironment issued a joint statement on the closure of the Ketapang complaints (December 2016). • Unilever has discussed with RAN, Grassroots and IOI (directly and via email) to discuss these allegations. • Greenpeace officially halts campaign against IOI that has 'come a long way' (April 2017). • IOI explored the Terms of Reference for an independent IOI Sustainability Advisory Panel (May 2017).

		AidEnvironment (Ketapang case)	<ul style="list-style-type: none"> The IOI Pelita allegations are briefly mentioned in the Greenpeace 2017 report "Dirty Bankers". 		<ul style="list-style-type: none"> IOI published a Sustainability Implementation Plan (July 2017) and a Sustainability Progress Update (August 2017). Unilever resumed palm oil sourcing from IOI Group (August 2017) following good progress. Since 2017, IOI reports quarterly through implementation of its Group Sustainability Palm Oil Plan. On the Pelita case, IOI and Grassroots worked on a joint action plan which has been reviewed by Pelita and submitted to the RSPO. The action plan underwent review by the RSPO, who asked for clarification on Grassroots role/ status as complainant (December 2017). The sale of 70% of IOI LC to Bunge was completed, creating a new entity "Bunge Loders Croklaan" Or BLC. Unilever continue to engage with BLC for matters pertaining to IOI (March 2018). Pelita resolution plan received a conditional endorsement by the complaints panel (June 2018). IOI went ahead to socialize the plan to eleven communities involved in the dispute, June - July 2018. The socialization update is provided here (July 2018). RSPO Complaints Panel (CP) officially closed the complaint case on its plantation subsidiary companies in Ketapang, Indonesia (October 2018). Release from IOI here. Grassroots has since withdrawn as complainant to avoid a potential conflict of interest when continuing to advise the resolution process between IOI and communities and other relevant stakeholders (June 2018). The RSPO case is still open.
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B. Grievances against third-party/indirect suppliers raised to Unilever

Indirect/ third-party suppliers do not have a contract with Unilever, but our direct suppliers are currently sourcing from or have previously sourced palm oil from them.

Ref.	Date	Stakeholder	Subject matter of grievance allegation	Supplier(s) and palm oil link to Unilever SC	Latest Unilever and Unilever supplier actions to address the grievance allegations
B16	Sept 2018	Mighty Earth	<p>Alleged NDPE non-compliant companies with links to Unilever supply chain</p> <p>Mighty Earth with its partners AidEnvironment and MapHubs publish regular "Rapid Response" reports, based on their monitoring on over 3,000 palm oil concessions in Indonesia and Sarawak. Mighty Earth filed a grievance against seven companies alleged to be out of alignment with Unilever's Sustainable Palm Oil Policy.</p> <ul style="list-style-type: none"> ANJ: see B4. Tabung Haji: see B15. HSA Group: see B13. 	<p>Unilever does not have any direct business relationship with ANJ Group, Tabung Haji, HSA group, JA Wattie, Musirawas, and Samuel.</p> <p>However, these are third-party/indirect suppliers that may enter Unilever's supply chain through trade, as identified by Mighty Earth.</p>	<ul style="list-style-type: none"> Unilever issued a response letter to Mighty Earth in October and November 2018 and engaged directly with the grievance raiser to discuss next steps. Unilever latest meeting with Mighty Earth was in December 2018. With regards to the link to Unilever's supply chain with ANJ, in November 2018, Unilever started engagement with Gokul Agro to understand their view on the raised grievances against ANJ. Unilever is no longer buying from Gokul Agro. Other suppliers who previously declared they source for ANJ indicated they no longer source from ANJ. Our links to Musirawas came from our direct supplier, Wilmar, which stated it has not sourced from Musirawas since August 2018 but continues to engage with them to encourage them to meet NDPE commitments. More information available on Wilmar's Grievance List

			<ul style="list-style-type: none"> • JA Wattie: PT Condong Garut, reported to be managed by JA Wattie, allegedly cleared 52ha peat forest in West Kalimantan. Information in Rapid Response 6. • Musirawas: PT Sumur Pandanwangi allegedly developed 243ha of peat in the concession. Information in Rapid Response 6. • Samuel: 45ha of forest were cleared in PT Prasetya Mitra Muda (PMM) Blok II concession. In Rapid Response 6, Mighty Earth allege PT PMM to be 49.7% owned by Samuel International Group, “with the remaining shares owned by Samuel International’s Executive Director and other related members of associated companies.” 	<p>Mighty Earth reported potential indirect supply from the named companies through Unilever’s suppliers that include:</p> <p>KLK, Wilmar, GAR, Musim Mas, Cargill, IOI/Bunge, ADM, Louis Dreyfus, and Sime Darby.</p>	<ul style="list-style-type: none"> • Wilmar is one of Unilever’s direct suppliers that has been engaging directly with Samuel, and the latest update from this engagement is that Samuel International has signed a letter of commitment to Wilmar’s NDPE policy. Samuel is also reported to be looking into various assessments. We will continue to monitor this progress through our direct supplier. More information available on Wilmar’s Grievance List. • We continue to monitor how companies alleged to be NDPE non-compliant might be entering our supply chain through the palm oil mill list we conduct twice a year with Rainforest Alliance. We will reach out to these direct suppliers if they are found to be sourcing from such companies.
B15	May 2018	Greenpeace	<p>NDPE non-compliance allegations</p> <ul style="list-style-type: none"> • In a letter to major palm oil buyers, Greenpeace listed 26 alleged NDPE non-compliant palm oil producer groups (May 2018). • Greenpeace published “Final Countdown,” a report on the 26 companies and on brands and traders’ alleged failure to implement NDPE commitments that extend to their entire supply chains (September 2018). • AEP: see B11. • ANJ: see B4. • Bumitama: Greenpeace report alleging deforestation for plantation development, destruction of HCV, development on peatland, community land claims and lack of consultation or compensation. Also alleges issues with governance of a plasma scheme and cooperative and alleges failure to meet timetables for RSPO certification (January 2017). • CCM: Deforestation allegations that between November 2016 and October 2017 PT HIP cleared 500 ha of secondary forest. • Citra Borneo Indah/PT SSMS: See B2. • Djarum: Between August 2015 and September 2017, allegations that PT GSK cleared 1,100 ha of peatland forest. • DTK: Between July 2016 - October 2017 allegations that PT LAIK cleared around 1,200 ha of peatland forest. Despite stop work order by Apical in January 	<p>Unilever does not have any direct business relationship with AEP, ANJ, Bumitama (Lim Hariyanto family), Central Cipta Murdaya, Citra Borneo Indah/PT SSMS, Djarum. DTK Opportunity, GAMA, Genting, HSA Group, IJM Corporation, Indonusa, Korindo, Noble Group, NPC Resources, Rimbunan Hijau, Salim Group, Samling/Glenealy Plantations, Sungai Budi Group / Tunas Baru Lampung, Tabung Haji Plantations, Tee family / Prosper.</p> <p>These are potentially third-party/indirect suppliers that may enter Unilever’s supply chain through trade as identified by Greenpeace.</p>	<ul style="list-style-type: none"> • Unilever issued a response letter to Greenpeace on June 1st 2018, outlining views on the key challenges raised i.e. sourcing links with highlighted producer groups, NDPE compliance and verification, and multi-stakeholder approach for industry reform. The letter also included sourcing links and actions taken with regards to each supplier on the list. Unilever reached out to our major direct suppliers that potentially still source from companies on the list to identify each supplier’s position on the grievance and sourcing from the listed companies. See A6. • AEP: See B11. • ANJ: See B4. • Bumitama had published a sustainability report in 2016, which includes objectives and targets for implementation of its sustainability initiatives for the years 2017 to 2024, a time bound plan for RSPO certification for all subsidiaries and smallholders, area set aside for conservation, and detailed statement on the legality and process surrounding the acquisition of its subsidiary. Unilever will be monitoring the grievance resolution and progress towards these objectives through our direct suppliers. In the Final Countdown report, IOI, Unilever’s direct supplier and Bumitama JV partner, responded to the Greenpeace Sept 2018 allegations saying they are willing ‘to put pressure on Bumitama’s management as a substantial shareholder’. GAR published a report on their engagements with Bumitama in October 2018 with regards to the allegations raised in the Final Countdown report. It states that Bumitama would review the process of its acquisition method, and outlines action plans to comply with RSPO RaCP for concessions under grievance. Our supplier Musim Mas is engaging with Bumitama to resolve the grievances (refer to Musim Mas’ grievance list. Cargill will request for Bumitama’s action plan on compensation from its direct suppliers. • CCM: Unilever’s direct supplier Musim Mas has been engaging with Hardaya Plantations so that they undertake HCS and HCV assessment, assess legal compliance and establish an internal Standard Operating Procedure (SOP) on sustainability and NDPE. Information

		<p>2017, allegations that the company continued clearing.</p> <ul style="list-style-type: none"> • GAMA/Ganda: Allegations that they developed around 1,500 ha between January 2016 and December 2016, through the clearing of peatland forests or plantings in already cleared areas. PT GAN have recently construction new palm oil mill in West Kalimantan (reported in March 2018). See also A8. • Genting: Allegations that between March 2015 and June 2018, PT PSM cleared about 495ha forest in West Kalimantan. Previously, Genting subsidiary PT Susantri Permai is subject to a RSPO complaint for the alleged killing of an orangutan. • Hayel Saeed Anam (HSA) group: See B12. • IJM Corporation: Between July 2017 and November 2017 allegations that PT PBP cleared 150ha, mostly secondary forest. IJM Corporation is one of four companies that were excluded from Norway's Government Pension Fund Global in August 2015 due to alleged links with deforestation. • Indonusa: Between January 2015 and May 2017, allegations that PT IJS cleared 5,000ha of forest including approximately 1,000ha of primary forests. Some clearing has allegedly continued since that time. • Korindo: As alleged by Mighty Earth, the company cleared some tropical lowland forest and did not effectively identify and preserve conservation areas within its concession. There are also allegations of the use of fire for land clearance and that the company did not respect local community rights to provide or withhold FPIC for new development. • Noble group: See B8. • NPC Resources: NPC Resources was alleged to be implicated in the clearing of 900 ha peat forests in PT SAS between November 2016 and September 2017. • Rimbunan Hijau: As alleged by Global Witness and Greenpeace, this company is claimed to be responsible for logging forests for palm oil concessions in Papua New Guinea. • Salim group: see B3. • Samling/Glenealy plantations: EIA reported on Prestige Platform, a Samling subsidiary in Myanmar 		<p>available on Musim Mas' grievance list. Cargill reported that a moratorium is in place for Hardaya Plantation and there is active monitoring of the moratorium via AidEnvironment. There are not being additional development since the moratorium is in place. CCM is not in Cargill's supply chain.</p> <ul style="list-style-type: none"> • Citra Borneo Indah/PT SSMS: See B2. • Djarum: Unilever's direct supplier, GAR, has been engaging with HPI Agro with regards to NDPE compliance and monitoring PT GSK land clearance. More information on our supplier's engagement with PT GSK can be found on the GAR grievance list. Cargill initiated engagement with its direct supplier in February 2018. A moratorium is in place at PT GSK pending completion of required assessments by the supplier. More information can be found on Cargill's Indirect Suppliers Grievance Log. • DTK Opportunity: Soil analysis was completed in June 2017 while HCV assessment was completed two years ago in February 2016. PT LAIK is aware that HCS analysis is needed before they can resume any land clearing activities. PT LAIK is currently seeking consultants to help with their capacity to comply with NDPE requirements. Wilmar's last purchase from DTK was in August 2017, and Wilmar is monitoring progress. Cargill is currently not buying from the company. As reported in their Grievance Log, Cargill initiated engagement with their direct supplier in February 2018 on the allegations. They are aware that land clearing has ceased, and the company is carrying out the required assessments prior to any development, including HCS. • GAMA/Ganda: Wilmar does not source from GAMA but have engaged and will continue to monitor progress. In August 2018, GAMA and AidEnvironment signed a joint statement on their collaboration in developing and implementing NDPE Policy. See also A8. Cargill currently does not source directly from any of the mentioned companies associated with GAMA/Ganda but were indirectly impacted through its direct sourcing from Wilmar and other traders that also source from Wilmar. However, with Wilmar's decision to cease all sourcing from these companies since 20th June 2018, its supply chain is no longer linked. • Genting: In March 2017, PT PSM had ceased to be a subsidiary of Genting, as announced publicly here. In March 2017, Genting issued a statement regarding the case at PT Susantri Permai, and in September 2018 RSPO Complaints Panel issued a decision letter regarding the case. Cargill does not consider PT PSM as still being owned by Genting and BHD. Cargill is however aware of an open grievance (2016) facing three subsidiaries of Genting within the RSPO complaints system. The case for one subsidiary has been resolved, while the others are pending a final decision from the complaints panel based on action plans implemented by Genting. Cargill is monitoring the decision by RSPO. Our supplier KLK engaged with Genting to clarify the allegations, information available on KLK's Grievance List. • Hayel Saeed Anam (HSA) group: See B12. • IJM Corporation: Our direct supplier Wilmar met with IJM in December 2017. IJM immediately committed to a moratorium and Wilmar has offered support on the HCSA assessment. A workplan for HCSA assessment was discussed with Wilmar in May 2018. Terms of reference for the required assessment is being prepared jointly by Wilmar and IJM. They are monitoring progress monthly. More information on Wilmar's Grievance List.
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B14	April 2018	Chain Reaction Research, Greenpeace, Mighty Earth	<p>Clearance of peatland and forests allegation</p> <ul style="list-style-type: none"> • Chain Reaction Research reported the alleged clearance of peat and forests at the concessions of PT Persada Kencana Prima (PKP) and Hydroflow Sdn Bhd, 488 and 171 hectares respectively, in 2017. Tabung Haji Plantations allegedly acquired PT PKP and Hydroflow between 2012-2015 (April 2018). • Greenpeace included Tabung Haji Plantations in a letter to major palm oil buyers alleging that they are a non-compliant NDPE palm oil company in May 2018 and again in the report "Final Countdown" (Sept 2018). • In a letter to Unilever, Mighty Earth raised a grievance in Rapid Response 5 alleging THP of further deforestation of 217ha peat forests at PKP between April and June 2018. 	<p>Tabung Haji Plantations (THP)</p> <p>Unilever does not have any direct business relationship with Tabung Haji Plantations.</p>	<ul style="list-style-type: none"> • September 24, 2018, Unilever issued a public response to the Greenpeace campaign "Final Countdown". • Unilever issued a response letter to Mighty Earth in October 2018 and is engaging with Mighty Earth and direct suppliers to investigate the allegations. Unilever asked its major direct suppliers whether it was sourcing from directly or indirectly from THP. • Wilmar reported in its Grievance List that THP still has a "stop work order" in place, and is developing an action plan in which it is undertaking further steps to strengthen sustainability practices. • Wilmar engaged with THP in September 2018 and both parties agreed to appoint an independent assessor to conduct assessment of and map the area of contention. An independent assessor carried out field assessment at PT PKP in October 2018. Wilmar noted that a proposed rehabilitation plan will be established if there is indeed land clearing. We continue to monitor this progress directly with Wilmar and through their public grievance update. • Musim Mas (grievance list) and GAR (grievance list) are also Unilever direct suppliers that have been engaging with THP and through which we will continue to monitor this situation.
B13	February 2018	Foresthints.com	<p>Deforestation allegation</p> <p>Foresthints.com alleged that Unilever is linked to PT BHD (Bintang Harapan Desa) a mill that is claimed to be closely associated with palm oil concession PT PSM (Permata Sawit Mandiri) that itself is alleged to continue "to aggressively eradicate the habitat of the Bornean orangutan in order to develop new palm oil plantations in Indonesian West Kalimantan's Ketapang regency."</p>	<p>Bintang Harapan Desa (BHD)</p> <p>Unilever does not have any direct business relationship with Bintang Harapan Desa or Permata Sawit Mandiri.</p>	<ul style="list-style-type: none"> • Unilever has written to direct suppliers that had declared they previously bought directly or indirectly from PT BHD in 2017 regarding these allegations (February 2018). • Our direct suppliers indicated to us that they are no longer purchasing from PT BHD and that the palm oil concession PT PSM is no longer connected to PT BHD.

B12	December 2017	Greenpeace, Mighty Earth	<p>Clearance of protected forest allegation</p> <ul style="list-style-type: none"> Greenpeace Deforestation Case Studies allege ownership linkages between the Hayel Saeed Anam (HSA) Group, Pacific Inter-Link, and four concessions in Boven Digoel, Papua. This report alleges that between 2015-2017 one of the concessions, PT KCP, cleared around 4,000 ha of mixed primary and secondary forest (December 2017). Greenpeace included the HSA Group in a letter to major palm oil buyers alleging that the HSA Group was a non-compliant NDPE palm oil company in May 2018 and again in the report "Final Countdown" (Sept 2018). In a September 2018 letter to Unilever, Mighty Earth raised a grievance in Rapid Response 5 and Rapid Response 7 alleging PT KCP and PT MJR of further deforesting 82ha peat forests between May and August 2018. Mighty Earth alleged four UAE companies believed to be affiliated with the HSA group to have majority share in the four concessions in Boven Digoel, Papua. The allegations, alleged ownership link to the HSA group, and the group's response to the allegations are raised again in an article by the Gecko Project in November 2018. 	<p>Hayel Saeed Anam (HSA) Group</p> <p>Unilever does not have any direct business relationship with Pacific Inter-Link and Arma Foods.</p>	<ul style="list-style-type: none"> Unilever engaged Greenpeace regarding the findings of the Deforestation Case Study report and inquired about the HSA Group case (December 2017). Unilever reached out to the HSA Group after Unilever were made aware by Greenpeace of their possible non-compliance with Unilever's Sustainable Palm Oil Policy (December 2017). In January 2018, Unilever stopped buying from Pacific Inter-Link and Arma Foods (associated with the HSA group). Unilever issued a public statement regarding Unilever's position on the HSA Group allegations (May 2018). HSA issued a statement that it has not invested in any palm oil concessions in Indonesia or elsewhere, and that while "HSA had previously considered such an investment, the organisation decided not to proceed after due diligence studies demonstrated there was no clear business case to do so" (June 2018). PIL group issued a sustainability charter in July 2018 and launched a sustainability dashboard in Q3 2018. More information is available on their website. Unilever issued a public response to the Greenpeace campaign "Final Countdown" that included our position on the HSA case (September 2018). Mighty Earth provided a letter to the HSA group requesting an auditing firm to investigate, and provide an "independent, credible evidence," whether the four UAE companies are connected to the HSA group (December 2018). Unilever continues to engage with Mighty Earth regarding this grievance. The last physical meeting was in November 2018 which was followed up by a conference call in December 2018. Unilever continues to engage and have direct meetings with the HSA group. The last meeting was in November 2018 and correspondence in January 2019.
B11	Nov 2017	Mighty Earth, Greenpeace	<p>Deforestation allegation in Central Kalimantan</p> <ul style="list-style-type: none"> Mighty satellite maps and animations of Anglo Eastern Plantation's clearing at PT Kahayan Agro Plantation (KAP) in Central Kalimantan from Oct. 16, 2016 until Aug. 27, 2017 claimed to evidence an allegation of clearance of 420 ha of forest. Also, allegations that prior to Oct 16, 2017 there were 3,593 ha of forest cleared. Information in Rapid Response 1 (November 2017). Greenpeace included AEP in the "Deforestation Case Studies" (not public) Dec 2017, a letter to major palm oil buyers alleging that they are a non-compliant NDPE palm oil company in May 2018 and again in the report "Final Countdown" (Sept 2018). 	<p>Anglo Eastern Plantations (AEP)</p> <p>Unilever does not have any direct business relationship with Anglo Eastern Plantation.</p>	<ul style="list-style-type: none"> Unilever reached out to its major direct suppliers that could potentially source from AEP to identify each supplier's position on the grievance and sourcing from the listed companies (September 2018). Our direct supplier, Wilmar, is engaging directly with PT AEP. In March 2018, AEP appointed PT Meganesia Tirta Foresta to conduct a HCS assessment at PT KAP. The draft of the HCS report was shared to Wilmar in October 2018. More information available on Wilmar's Grievance List.
B10	May 2017	Greenpeace,	<p>Deforestation allegation</p> <ul style="list-style-type: none"> EIA submitted first-ever grievance against a licensed HCV assessor, for allegedly advising as sustainable the 	<p>Ciliandry Anky Abadi (CAA) / First Resources</p>	<ul style="list-style-type: none"> Unilever reached out to First Resources regarding the allegations made by Greenpeace about non-compliance with Unilever's Sustainable Palm Oil Policy on First Resources linked to the Ciliandry Anky Abadi (January 2018).

		Environmental Investigation Agency (EIA), Foresthints.com	<p>clearance of ca 470,000ha of forests, believed to be controlled by groups such as: Bunitama, First Resources, Noble, PT Austindo Nusantara Jaya and Goodhope (May 2017).</p> <ul style="list-style-type: none"> Greenpeace Deforestation Case Studies (not disclosed to the public) claimed to illustrate links between the ownership of First Resources, PT Fangiono Agro Plantation and Ciliandry Anky Abadi (CAA) through the Martias Fangiono family. Greenpeace alleged deforestation by CAA's subsidiary PT Agrindo Green Lestari of secondary forest with orangutan habitat (2017). Foresthints.com article stated Unilever is linked to the Ciliandry Anky Abadi (CAA) group, owner of palm oil mills (PT TM and PT BKI) responsible for the deforestation of Borneo's peat forest. There is no clarity to the exact names of these mills but the names of the mills allegedly can be found in Unilever's 2017 palm oil mill list of direct and indirect suppliers (February 2018). Greenpeace included First Resources in a letter to major palm oil buyers alleging that First Resources was a non-compliant NDPE palm oil company in May 2018 and also in the report "Final Countdown" (Sept 2018). 	Unilever does not have any direct business relationship with CAA or First Resources.	<ul style="list-style-type: none"> Unilever has stopped buying from First Resources from Q1 2018. Unilever reached out to foresthints.com regarding the exact name of the mills allegedly present in Unilever's mill list linked to the CAA but received no response from foresthints.com (February 2018). In September 2018, First Resources clarified through statements linked to their grievance list (last updated September 2018) that none of the companies named are subsidiaries and/or associated companies of First Resources, therefore there are no commercial links between them. First Resources statement on CAA is available here. Unilever reached out to our major direct suppliers that potentially sourced from companies from CAA / First Resources to identify each supplier's position on the grievance and sourcing from the listed companies (September 2018). Wilmar reported to Unilever that their last purchase from CAA was in March 2018, as listed on their Grievance List. Musim Mas engaged with First Resources through mill verification and later to raise concerns on the allegations. For more information, refer to Musim Mas grievance list.
B9	April 2017	Oxfam, Guatemala Human Rights Commission and coalition of NGOs	<p>Alleged spill of toxic effluent in Guatemala Allegations of a spill of toxic effluent in Pasión River and threats made to human rights defenders, Guatemala.</p> <ul style="list-style-type: none"> Oxfam published a blog update on REPSA (April 2017). Open letter from NGOs to all buyers of REPSA (April 2017). 	REPSA Unilever does not have any direct business relationship with REPSA.	<ul style="list-style-type: none"> REPSA issued a response to the open NGO letter (May 2017) and a Sustainability Action Plan for 2016-2017. REPSA and TFT have agreed to continue working together in Guatemala around a (1) Sustainability Action Plan, (2) Stakeholder engagement and transparency; (3) Multi-stakeholder workshop / dialogue, and (4) Integrated Social Management System (ISMS). First, second and final progress reports can be found on their website. During 2017, Unilever found that REPSA oils potentially came into Unilever's supply chain via Cargill and Wilmar through a previous palm oil mill declaration of these suppliers they submitted. Unilever reached out to Cargill and Wilmar in January 2018 and both confirmed to Unilever and in their subsequent grievance lists that they have put on hold purchases from REPSA in 2017. Cargill engaged with the supplier and stated that it no longer buys from REPSA. Cargill is engaging REPSA on a re-engagement plan. Detailed information on their engagement is available on Cargill's grievance list and log update for REPSA. Wilmar engaged with the supplier and stated that it no longer buys from REPSA from December 2017. Detailed information on this engagement is available on Wilmar's Grievance List.

B8	January 2017	Greenpeace, Environmental Investigation Agency	<p>Deforestation allegation</p> <ul style="list-style-type: none"> Greenpeace released the report "Dirty Bankers" making allegations with respect to certain major banks and their financing of palm oil companies (January 2017). EIA submitted first-ever grievance against a licensed HCV assessor, for allegedly advising as sustainable the clearance of ca 470,000ha of forests, believed to be controlled by groups such as: Bumitama, First Resources, Noble, PT Austindo Nusantara Jaya and Goodhope (May 2017). HSBC requests RSPO to investigate allegations of deforestation by Noble Plantations in Papua; RSPO advises Noble to suspend development on the concession (July 2017). Greenpeace release "Palm Oil Alert 4" including allegations concerning Noble, Korindo, and POSCO Daewoo (September 2017). Greenpeace included the Noble Group in a letter to major palm oil buyers alleging that the Noble Group was a non-compliant NDPE palm oil company in May 2018 and again in the report "Final Countdown" (Sept 2018). 	Noble Group Unilever does not have any direct business relationship with the Noble Group.	<ul style="list-style-type: none"> Unilever was made aware of the allegation on non-compliance of Unilever's Sustainable Palm Oil Policy by Noble Plantation through the Greenpeace "Dirty Bankers" report. Since then, Unilever has engaged with the Noble Group (COFCO) regarding its alleged links to Noble Plantations. Unilever decided in October 2017 not to continue business with Noble Natural Resources India (Noble Group/COFCO). Noble published a Sustainability Information Document, and submitted a letter to the complaints panel, citing a "stop work" order has been put in place in PT Pusaka Agro Lestari (October 2017). Unilever's direct supplier, Musim Mas, is engaging with Noble to follow up on the progress of this sustainability plan. More information available on the Musim Mas grievance list. The RSPO Complaints Panel decided in January 2018 to proceed with independent verification of the assessments conducted by Noble. Unilever is monitoring the complaint resolution progress on the RSPO website. Noble is not in Unilever's indirect supply chain per June 2018.
B7	November 2016	Amnesty International, Environmental Investigation Agency (EIA)	<p>Alleged labor exploitation issues</p> <ul style="list-style-type: none"> BEST group was a supplier of Wilmar with alleged labor exploitation in an Amnesty International Report, "The Great Palm Oil Scandal" (November 2016). A Central Kalimantan court ordered the local government to review the plantation permits of companies implicated in the 2015 haze, after a case was submitted in 2016: Wilmar, BEST, GAR, and Bumitama included (2017). 	BEST Group Unilever does not have any direct business relationship with the BEST Group.	<ul style="list-style-type: none"> Unilever sent PT Global Interinti a letter of concern, dated December 2, 2016, on the allegations raised by Amnesty International. Unilever stopped buying directly from the BEST Group in May 2016. Wilmar put on hold purchases from PT BEST with effect from June 2017. BEST is not in Unilever's indirect supply chain per June 2018.
B6	November 2016	Rainforest Action Network (RAN)	<p>Deforestation in Leuser Ecosystem (Aceh) allegation</p> <p>RAN released a report "Protecting the Leuser Ecosystem" (2016) alleging illegal deforestation of elephant habitat within the Leuser Ecosystem and mills in the Singkil Bengkulu area that are allegedly at risk for sourcing "Conflict Palm Oil".</p>	PT Surya Panen Subur II Unilever does not have any direct business relationship with PT Surya Panen Subur II (PT SPS II).	<ul style="list-style-type: none"> Unilever has been engaging with RAN and major direct suppliers, directly and via email. In October 2018, Unilever reached out to direct suppliers to understand their sourcing relationships with PT SPS II. Most of Unilever's direct suppliers have ceased sourcing from PT SPS II, and one is halting new procurement and asking PT SPS II to create and execute a time-bound plan by the end of 2018. GAR and PT SPS II agreed on site visits, action plan, progress updates and next steps, one of which was to conduct participatory mapping that was also carried out (Oct 2016). GAR supported PT SPS in their Collaboration for Transformation (CFT) programme, which

			<p>The Rainforest Action Network (RAN) through the Leuser Watch campaign published a report alleging that the palm oil company PT Surya Panen Subur II (PT SPS II) was responsible for the destruction of thousands of hectares of the Tripa peat land/forest in Aceh. Initial findings were found in 2014. PT SPS was found guilty by the State Prosecutor's Office of clearing of peat forests (2016). RAN has further reported allegations that there continues to be evidence of deforestation occurring in January and March 2018 during which heavy machinery was used to clear forest for palm oil development, and in some cases the use of fire.</p>		<p>completed conflict resolution process implementation (Dec 2017). For each new allegation in 2015-2018, SPS II confirmed new land clearing and burning and reiterated that the clearance was committed by external parties. In June 2018, GAR and SPS II discussed and agreed upon actions for conflict resolution, which included building and improving communication with "land clearing actors", local, provincial, and international stakeholders, including RAN. In July 2018, a high level meeting was held between GAR and SPS II management, during which GAR asked for a more concrete solution for the ongoing deforestation caused by encroachment in SPS II concession. More information on GAR grievance list.</p> <ul style="list-style-type: none"> • Musim Mas do not list SPS II in their grievance list but have engaged with multiple other suppliers (Pati Sari, Sisirau, Mopoli Raya, Ensem Sawita, Ensem Lestari, Bangun Sempura Lestari; suppliers in Singkil Regency). In August 2017, Ensem Sawita (supplier to Wilmar and Musim Mas) confirmed that all purchasing from PT ABN had ceased. In September 2017, their engagement focused on Ensem Sawita, who has now committed to an action plan in collaboration with Musim Mas and GAR to ensure that its sustainability practices are in line with policy commitments. More information available on Musim Mas grievance list. • Wilmar reported that PT SPS II has also been transparent in updating Wilmar regularly on their progress in addressing issues raised by RAN, and Wilmar continue to support PT SPS II in addressing challenges of alleged occupation on the unopened area, that was set aside under the moratorium. Field verification by ministry officials (KLHK) and Wilmar's meeting with PT SPS II took place in July 2018. More information available on Wilmar's Grievance List. • ADM reached out to supplier Wilmar and are satisfied with their handling of the issue. Source: ADM Grievances and Resolutions Summary Table. • Bunge states it does not directly supply from the area but may be indirectly exposed through traders. Source: Bunge Loders Croklaan grievance list. • Cargill in 2017 requested their direct suppliers (Wilmar, GAR, Musim Mas) to share action plans for Leuser monitoring. They have been proactively monitoring the Leuser landscape for mill assessment opportunities and supporting other landscape-level deforestation monitoring & response systems which can strengthen the work in Leuser. Source: Cargill indirect grievance list.
B5	Nov 2016	Rainforest Action Network (RAN)	<p>Deforestation in Leuser Ecosystem (Aceh) allegation</p> <ul style="list-style-type: none"> • RAN released a report "Protecting the Leuser Ecosystem" (2016) alleging illegal deforestation of elephant habitat by PT. ABN (alleged to be connected to Wilmar) within the Leuser Ecosystem. • This is followed up by another article by RAN (February 2017) and a report (July 2017) alleging that PT Agra Bumi Niaga (PT ABN) is responsible for ongoing clearance in 2017. 	Agra Bumi Niaga (PT ABN) PT ABN sold FFB to PT Ensem Sawita, a mill that supplied to Unilever's direct supplier Wilmar, Musim Mas, and GAR.	<ul style="list-style-type: none"> • Unilever wrote to Wilmar, Musim Mas, and GAR regarding the allegations and are monitoring action plans conducted with these traders (2017). • PT Ensem Sawita confirmed that all purchases of palm oil from PT ABN has ceased (August 2017). This information, along with key engagements done by GAR and Musim Mas are reported by GAR in September 2017. • ABN is not in Unilever's indirect supply chain per June 2018.

			<ul style="list-style-type: none"> • Guardian article alleged Unilever and other big brands of "complicity in rainforest destruction" due to oil coming from PT ABN to in the supply chain (2017). 	Unilever does not have any direct business relationship with PT ABN.	
B4	Sept 2016	Greenpeace, Environmental Investigation Agency (EIA), Foresthints.com, Mighty Earth	<p>Deforestation allegation</p> <ul style="list-style-type: none"> • In September 2016, Greenpeace report 'Deadly Trade-off' included ANJ for the alleged actions of two of its concessions in West Papua, managed by PT Permata Putera Mandiri and PT Putera Manunggal. Both companies are accused in the allegations of destruction of primary forest, development without consultation of local communities and for absence of a FPIC process. • EIA submitted first-ever grievance against a licensed HCV assessor, for allegedly advising as sustainable the clearance of ca 470,000ha of forests, believed to be controlled by groups such as: Bumitama, First Resources, Noble, PT Austindo Nusantara Jaya and Goodhope (May 2017). • Greenpeace Deforestation Case Studies (not disclosed to the public) contained allegations of continued deforestation in West Papua in the second half of 2017. • Foresthints.com stated allegations that Unilever is connected to ANJ which has been clearing High Carbon Stock (HCS forests) in Papua since 2017 (March 2018). • Greenpeace included ANJ in a letter to major palm oil buyers alleging that they are a non-compliant NDPE palm oil company in May 2018 and again in the report "Final Countdown" (Sept 2018). • In a September 2018 letter to Unilever, Mighty Earth raised a grievance in Rapid Response 4 and Rapid Response 6 alleging ANJ of further deforesting 82ha peat forests between May and July 2018. • In November 2018, Chain Reaction Research reported allegations that ANJ's continued land clearing violated the newly adopted RSPO P&C which requires its members to adhere to the Assessor Licensing Scheme (ALS) of the combined High Conservation Value (HCV) – High Carbon Stock (HCS) approach. 	<p>Austindo Nusantara Jaya</p> <p>Unilever does not have any direct business relationship with PT ANJ.</p>	<ul style="list-style-type: none"> • ANJ officially adopted a "No Deforestation, No Peat, No Exploitation (NDPE)" policy in November 2016. • Unilever wrote to suppliers who had previously declared that they have bought directly or indirectly from ANJ mills regarding these allegations (March 2018). • Unilever wrote to Foresthints.com, noting that Unilever does not have any direct contracts with the palm oil mills (including those owned by ANJ) highlighted in the Foresthints.com articles, and was contacting direct suppliers who declared the mills to find out if they are still currently sourcing from these mills (March 2018). • Unilever issued a response letter to Greenpeace in June 2018, outlining views on the key challenges raised i.e. sourcing links with highlighted producer groups, NDPE compliance and verification, and multi-stakeholder approach for industry reform. The letter also included sourcing links and actions taken with regards to each supplier on the list. • Unilever engaged independent consultants to identify which mills of the listed companies by Greenpeace were in the Unilever's mills list, to get better clarity of how the listed companies are in Unilever's supply chain. • Unilever issued a public response to the Greenpeace campaign "Final Countdown" (September 2018). • Unilever issued a response letter to Mighty Earth in October 2018 and met with Mighty Earth in December 2018. • Wilmar and GAR have reported in public grievance lists that they do not source from ANJ. Musim Mas has applied a "controlled purchase" on ANJ. • Cargill adopted a "no-buy" position on ANJ in October 2016 due to non-compliance in ANJ's Papua operations, and has been engaging with their direct supplier Permata Hijau Group (PHS) on the matter. More information is available on Cargill's Grievance Log.

B3	June 2016	Rainforest Action Network (RAN), OPPUK, ILRF, Greenpeace, AidEnvironment, Rainforest Foundation Norway, and SumofUs	<p>Allegations of Labor rights violations</p> <ul style="list-style-type: none"> In June 2016, RAN, OPPUK and ILRF published a report titled, "The Human Cost of Conflict Palm Oil" which alleged that Child labor, exposure to highly hazardous pesticides, payment below the minimum wage, long-term reliance on temporary workers to fill core jobs, and the use of company-backed unions to deter independent labor union activity, among other findings had all occurred on the plantations in Indofood Agri operations. Alleged clearance and labor issues in Indofood Agri were reported again in the Greenpeace report "Deadly Trade-Off" (Sept 2016). RAN filed a formal complaint at the RSPO against PT PP London Sumatra and its parent company PT Salim Ivomas Pratama Tbk. (October 2016). Greenpeace dismissed new palm oil policy issued by Indofood's agriculture subsidiary Indofood Agri Resources Ltd, "as inadequate in both substance and scope" (March 2017). Greenpeace issued a palm oil alert for Indofood/Salim Group, citing environmental and social issues (May 2017). ILRF update reported their follow-up investigations to find "no real changes" to the alleged labor working conditions (August 2017). In November 2017, RAN, OPPUK and ILRF published "The Human Cost of Conflict Palm Oil Revisited", detailing new allegations of labor abuses on certified plantations owned by Indofood. <p>Draining and clearing of peat allegations</p> <ul style="list-style-type: none"> AidEnvironment, commissioned by RAN, published "Palm oil sustainability assessment of Salim-related companies in Borneo peat forests" (April 2018) alleging Salim-linked companies are draining the Ketungau peat swamp in Sintang, West Kalimantan, Indonesia. <ul style="list-style-type: none"> PT Duta Rendra Mulya (PT DRM) PT Sawit Khatulistiwa Lestari (PT SKL) Greenpeace included Indofood Agri and deforestation cases allegedly done by PT DRM and 	Salim Group/Indofood Agri Unilever does not have any direct business relationship with the Salim Group/Indofood Agri.	<ul style="list-style-type: none"> Unilever wrote to the Rainforest Action Network (RAN) regarding these allegations and that appropriate steps must be taken by Indofood and monitored by our suppliers who are still sourcing from Indofood (February 2017). Indofood Agri uploaded a Sustainability Policy on their website (August 2017). Unilever wrote to suppliers who had declared that they have bought directly or indirectly from Indofood mills in 2017 regarding these allegations. KLK has put on hold purchases from Indofood with effect from September 2016. Source: KLK's Grievance List. On their grievance list, Musim Mas outlines their engagement with Indofood Agri, RSPO and NGO stakeholders on this matter. Musim Mas invited all stakeholders to urge both the RSPO and Indofood Agri to prioritise the case and for both parties to report progress publicly, draft and abide by a time-bound action plan, publish verification results, and provide an open channel for communication with all stakeholders (February 2018). Unilever issued a public statement on the allegations against the Salim Groups stating that Unilever asked our suppliers to ensure that no palm oil sourced by them comes from the Salim Group companies (May 2018). RSPO field verification planned for June 2018 (this was halted by complainants not revealing exact location, but Indofood Agri have sent a Non-reprisal to the RSPO confirming that there will be no intimidation of workers/complainants). Musim Mas announced a temporary cessation in business relationship with Indofood Agri since August 2018. More information is available on Musim Mas website (September 2018). Unilever met with RAN to discuss the concerns (October 2018). RSPO Complaints Panel issued a Final Decision Letter (November 2018). The letter followed an independent verification at mill and plantations of PT Lonsum in April 2018. It reported several findings that RSPO urged Indofood Agri to resolve in 3-6 months. In November 2018, Unilever issued a public statement responding to the decision of the RSPO Complaints Panel. Musim Mas, Unilever, and several other suppliers and buyers issued an open letter to the RSPO, asking for improvements to the complaints system, especially with regards to clarity and transparency. This follows RSPO's decision letter on the Indofood Agri case. The letter can be accessed here (November 2018).
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			PT SKL in a letter to major palm oil buyers alleging that they are a non-compliant NDPE palm oil company in May 2018 and again in the report " Final Countdown " (Sept 2018). Between April 2015 and March 2018.		
B2	May 2016	Chain Reaction Research (CRR), Foresthints, Greenpeace	<p>Deforestation and NDPE non-compliances allegation</p> <ul style="list-style-type: none"> In a sustainability benchmark report of palm oil growers listed on the Indonesian stock exchange, Chain Reaction Research presented drone imagery recording alleged active deforestation in PT MPP in May 2016, part of the CBI group/PT SSMS. Chain Reaction Research release new report "Sawit Sumbermas Sarana: Supplying the Palm Oil Leakage Market, Risks for Purchasers" (June 2017). Foresthints.com reported allegations that PT BSG, a subsidiary of PT SSMS was developing new palm oil plantations in sections of targeted peat restoration areas. (April 2018). Greenpeace included SSMS in a letter to major palm oil buyers alleging that SSMS was a non-compliant NDPE palm oil company in May 2018 and again in the report "Final Countdown" (Sept 2018). 	<p>Citra Borneo Indah (CBI) Group/Sawit Sumbermas Sarana (SSMS)</p> <p>Unilever does not have any direct business relationship with CBI/SSMS.</p>	<ul style="list-style-type: none"> Following the independent verification process conducted by Daemeter to review the allegations against Citra Borneo Indah (CBI)/PT SSMS, Unilever concluded that CBI / SSMS was not in full compliance with Unilever's Sustainable Palm Oil Policy. Unilever has not bought palm oil directly from SSMS since June 2017 and earlier issued a public statement regarding Unilever's position on this grievance. In September 2017, SSMS released a Sustainability Policy (NDPE) and is developing a roadmap to comply with new policy. The SSMS group undertook assessments of the areas reported by Foresthints.com and published a response on their website. SSMS investigation confirmed that the alleged development took place outside BSG's permit (<i>izin lokasi</i>) at the request of local smallholders. An assessment by Sulung Research Station concluded the area in question was not peatland. PT BSG has ceased land clearance in the area and PT SSMS is working with the Peat Restoration Agency (BRG) to clarify peat mapping and soil composition. Unilever continues to monitor progress and engage directly with SSMS in the action plans and remediation plans relating to the allegations. The latest meeting was held in August 2018.
B1	October 2015	Coalition of civil society groups, Greenpeace, Chain Reaction Research	<p>Allegations of labor rights violations and deforestation</p> <ul style="list-style-type: none"> FELDA-FGV RSPO complaint was made related to allegations on breached labor conditions in their plantations, following an article on the Wall Street Journal (October 2015). RSPO issued a response to the report. RSPO issued a response to the report, reporting it requested ASI to conduct a compliance audit on the certification bodies involved and an investigation audit to the Felda operations in the area linked to the allegations. The resulting audit and investigation reports are available here. In November 2015, A coalition of civil society groups issued a response to the investigation. In a letter, the coalition of civil society groups recommended buyers and investors to require Felda to publicly release a Policy on Employment of Migrant Labor and Corrective Action Plan within three months (September 2016). 	<p>FELDA/Felda Global Ventures (FGV)</p> <p>Unilever does not have any direct business relationship with FELDA/FGV.</p>	<ul style="list-style-type: none"> FELDA/FGV submitted an action plan to the RSPO (July 2016). Unilever engaged with IFFCO (Malaysia) Bhd. and FELDA-IFFCO regarding allegations brought by Greenpeace through the July 2017 Palm Oil Alert. FELDA states they had all necessary approvals from relevant authorities in Indonesia, in respect of the development PT Temila Agro Abadi's plantation (2017). FGV informed on the enhancement of the peat protection clause in the Group's Sustainability Policy (August 2017). FGV to restore over 1,000ha of rainforest in West Kalimantan (2017). In January 2018, Unilever reached out after receiving a report by Greenpeace about their alleged non-compliance with Unilever's Sustainable Palm Oil Policy. Unilever no longer sources from Felda-IFFCO and IFFCO since January 2018. Unilever continued to engage with FGV and IFFCO to discuss their sustainability plans in August and November 2018. FGV published sustainability updates in January and April 2018, which contain updates on FGV's Social Compliance and Human Rights action plan and Peat Restoration Master Plan. FGV announced enhancement to FGV's sustainability policy focusing on peat management, HCS Approach adoption, human rights, worker welfare, and local communities. FGV Announced that it had submitted a detailed Peat Restoration Plan for approval by Indonesia's Ministry of Environment and Forestry (KLHK) (April 2018).

		<ul style="list-style-type: none"> • Allegations that Felda continued to clear peat forest at PT TAA in West Kalimantan. Drone images alleged to show ongoing deforestation (April 2017). A case is logged at the RSPO complaints panel. • Greenpeace released a Palm Oil Alert on Felda allegations and calls for measures to be taken by companies (July 2017). • Greenpeace included FELDA/FGV in a letter to major palm oil buyers alleging that FELDA/FGV was a non-compliant NDPE palm oil company in May 2018 and also in the report "Final Countdown" (Sept 2018). • RSPO Complaints Panel issued a decision letter following an independent verification visit (November 2018). 		<ul style="list-style-type: none"> • FGV published a statement reaffirming its stand on sustainability commitments (May 2018). • In a response to the RSPO Complaints Panel decision, FGV stated that it has "frozen all new recruitment of workers from external contractors across its operations, with immediate effect." (November 2018) • Unilever is monitoring the complaint resolution progress on the RSPO website (November 2018). • Unilever's supplier, KLK, met with FGV in December 2018 and updated that peat restoration has started in the area categorized under "Protection", and there will be no replanting in this area. For existing peat area under 'Economic' category, their hydrological function would be maintained. On the labour rights allegation highlighted in the RSPO Complaints Panel Decision Letter, FGV confirmed that it is preparing an action plan, targeted to be ready and made public by February 2019. More information on KLK's Grievance List. • Unilever is also monitoring progress through Sime Darby, which has indicated it purchased from FGV (not from its Indonesian operations) and is engaging with FGV directly. Information available on Sime Darby's Grievance Register.
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