

# Unilever's Palm Oil Grievance Tracker Updated April 2023

This document lists grievances that have been raised to Unilever concerning our palm oil supply chain. Unilever defines a palm oil grievance as a complaint sent to Unilever about an alleged breach of Unilever's [People and Nature Policy \(PDF | 2.04 MB\)](#) and the associated [Guidelines](#). 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 <sup>1</sup> with supply chain grievances		
13		
	Supplier Name	References
1	ADM	A4, A6, B6, B16
2	Agropalma	A17
3	Apical/Asian Agri	A4, A7, A16, B15, B18, B29
4	Bunge LC/IOI	A1, A4, A6, A7, B6, B16, B18, B19
5	Cargill	A4, A6, A7, A11, A14, B6, B9, B15, B16, B18, B19
6	Emami Agrotech	A9
7	Golden Agri Resources (GAR)	A3, A4, A6, A7, A14, B4, B5, B6, B14, B15, B16, B19, B20
8	Karyaindah Alam Sejahtera	A13
9	Kuala Lumpur Kepong Bhd (KLK)	A2, A7, B16
10	Louis Dreyfus	A4, B16
11	Musim Mas	A4, A6, A7, A15, B3, B4, B5, B6, B8, B10, B14, B15, B16, B19, B20
12	Sime Darby	A4, A6, A7, A10, A15, B16
13	Wilmar	A4, A5, A6, A7, A8, B4, B5, B6, B7, B9, B10, B11, B14, B15, B16

B. Third-party/indirect suppliers <sup>2</sup> with supply chain grievances		
56		
	Supplier Name	References
1	AA Sawit Sdn Bhd	B35
2	Agra Bumi Niaga	A6, B5
3	Amanah Saham Pahang	B25
4	Anglo-Eastern Plantations	B11, B15
5	Astra Agro Lestari	B27, B36
6	Austindo Nusantara Jaya	B4, B15, B16, B18
7	Bintang Harapan Desa	B13
8	Best Group	B7, B22
9	BLD Plantations	B18
10	Brasil Biofuels	B40
11	Bumitama	B15, B41, B44
12	CAA/First Resources	B10, B18, B32
13	Capitol Group	B24
14	CB Industrial Product Holdings	B24
15	Central Cipta Murdaya/ Hardaya Group	B15, B43
16	Citra Borneo Indah/PT SSMS	B2, B15, B18
17	Dharma Satya Nusantara	B34
18	Djarum	B15
19	DTK Opportunity	B15
20	East New Britain Resources	B31
21	Felda, FGV, Felda-IFFCO	B1
22	First Borneo Group	B38
23	GAMA/Ganda (now KPN)	A8, B15
24	Genting	B15
25	Global Sawit Semesta	B20
26	HSA Group	B12, B15, B16
27	IJM Corporation	B15
28	Indofood Agri (Salim)	B3
29	Indonusa	B15, B22
30	JA Wattie	B16
31	Jalan Abesin Ltd.	B37
32	Jhonlin group/Batulicin Agro	B18, B22
33	Korindo	B15
34	Laot Bangko	B19
35	Mulia Sawit Agro	B18, B22
36	Musirawas	B16, B22
37	Noble Group	B8, B15
38	NPC Resources	B15
39	Pasifik Agro Sentosa	B30
40	Peputra Group	B22
41	PKPP Plantation Sdn Bhd	B25
42	PT Perkebunan Nusantara I	B19
43	Pundi Lahan Khatulistiwa Group	B17
44	REPSA	B9
45	Rimbunan Hijau	B15, B28, B31
46	Samling/Glenealy	B15
47	Samudera Sawit Nabati	B20
48	Samuel	B16
49	Sentosa Kalimantan Jaya	B44
50	Sungai Budi Group/Tunas Baru Lampung	B15, B22
51	Surya Panen Subur II	A6, B6
52	Tabung Haji Plantations	B14, B15, B16
53	Tee family/Prosper Group	B15, B18, B31
54	Yayasan Pahang (YP)	B25
55	Yayasan Sabah/Innoprise Plantations Sdn Bhd	B33
56	YPJ Plantations Sdn Bhd	B26

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 the 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 source palm oil from a supplier group should not be assumed to be a confirmation of fault of any kind.

<sup>1</sup> Direct suppliers have a contract with Unilever and directly supply Unilever's palm oil.

<sup>2</sup> Indirect/ third-party suppliers do not have a contract with Unilever, but our direct suppliers are currently sourcing from or had previously declared sourcing palm oil from them (up to a mill level).

## 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
A17	Sept 2022	Global Witness	<p><b>Allegation of human rights violations</b></p> <p>Global Witness reported in <a href="#">an article</a> allegations of human rights and land rights violations linked to two palm oil producers in Brazil, Brasil Biofuels (BBF), and Agropalma.</p>	Agropalma	<ul style="list-style-type: none"> <li>• Unilever was first made aware of the allegations from its monitoring of the local media. Unilever conducted a detailed assessment of the supplier which includes a review of information already provided, as well as new documents provided by Agropalma.</li> <li>• Unilever is engaging Agropalma and requesting information on what steps have been taken to address the allegations.</li> <li>• Unilever issued a <a href="#">statement</a> in response to the Business &amp; Human Rights Resource Centre (October 2022).</li> <li>• Unilever met with Agropalma (February, April 2023).</li> <li>• We are aware that local authorities are involved and we are monitoring the situation and decisions issued.</li> </ul>
A16	November 2021	Rainforest Action Network	<p><b>Allegation of NDPE noncompliance in group-associated companies</b></p> <p>Letter to Unilever alleges NDPE-noncompliant sourcing of palm oil, and violation of customary land rights, criminalization of human rights defenders, deforestation, and use of fires inside concessions in supplier group-associated pulp and paper companies.</p> <p>Similar points in the letter are raised in articles on the RAN website <a href="#">here</a> and <a href="#">here</a>.</p> <p>KSPPM released a statement on their <a href="#">website</a> (February 2023).</p>	<p>Unilever direct supplier mentioned in the report:</p> <ul style="list-style-type: none"> <li>• Apical</li> </ul> <p>We do not have a direct business relationship with APRIL or PT Toba Pulp Lestari (TPL).</p>	<ul style="list-style-type: none"> <li>• Unilever has engaged with Apical with regards to the case involving noncompliant sourcing from a plantation in the Leuser Ecosystem. See case B29.</li> <li>• Unilever is aware of the grievances raised against our supplier Apical's parent group, the Royal Golden Eagle (RGE) group, with regards to other concerns in sustainability and land rights across its operations.</li> <li>• PT TPL released a <a href="#">response</a> on its website (December 2021).</li> <li>• Unilever team met with representatives from RGE, Apical, and APRIL to discuss points in the allegations and push for a resolution which includes independent verification, especially concerning the allegations raised against PT TPL, including PT TPL's commitment to land mapping and third-party assurance, and definition of "corporate group" (April 2022).</li> <li>• RGE issued a <a href="#">statement</a> on its engagement with TPL (April 2022).</li> <li>• PT TPL has entered an agreement with the Earthworm Foundation (EF) to review and improve its social engagement system and processes (October 2022). Find the full statement on the <a href="#">TPL</a> and <a href="#">Earthworm Foundation</a> websites.</li> <li>• PT TPL issued a <a href="#">progress update</a> on its website (February 2023).</li> <li>• With regards to the statement raised by KSPPM, EF published its response on its <a href="#">website</a> (April 2023). Unilever is engaging RGE through its supplier Apical to ensure this statement is supported by a check on procedures that were claimed to be set and followed</li> </ul>

					<p>when engaging the communities and, moving forward, a commitment to reach out to the CSO and improve the consultation process.</p> <ul style="list-style-type: none"> <li>• We are continuing to monitor the progress through Apical and RGE.</li> </ul>
A15	December 2021	Mighty Earth	<p><b>Rapid Response 37</b></p> <p><a href="#">A report</a> containing allegation of High Carbon Stock (HCS) area clearing within a Musim Mas concession PT Multipersada Gatramegah between May and July 2021.</p>	Musim Mas	<ul style="list-style-type: none"> <li>• A review of the case with our deforestation monitoring partners, and as confirmed by Musim Mas, indicated that the area cleared was not classified as HCS but rather as cultivated land. This is consistent with the result of a peer-reviewed HCS assessment done in 2018, available on the HCSA <a href="#">website</a>.</li> <li>• Grievance is therefore not upheld (December 2021).</li> </ul>
A14	June 2021	TuK Indonesia, PUSAKA, Walhi, and Forest Peoples Programme	<p><b>Allegation of ongoing violation of human rights</b></p> <p><a href="#">A report</a> compiled by TuK Indonesia, PUSAKA, Walhi, and Forest Peoples Programme contains allegations of unresolved human rights grievances at ten plantation companies linked to global brands.</p>	<p>Unilever direct suppliers were mentioned in the report:</p> <ul style="list-style-type: none"> <li>• GAR/Sinar Mas, PT Kresna Duta Agroindo</li> <li>• Cargill, PT Harapan Sawit Lestari (see also: A11)</li> </ul>	<ul style="list-style-type: none"> <li>• Unilever reached out to Cargill and GAR on the allegations of unresolved grievance raised in the report (June 2021).</li> <li>• GAR responded that the allegations refer to issues that have been resolved in 2016 and closed at the Roundtable on Sustainable Palm Oil (RSPO), and there are no outstanding disputes with the community at PT KDA. This resolution is based on an agreement between all parties and the implementation of action plans on the ground. More detailed information can be found on the <a href="#">RSPO case tracker</a> and GAR's <a href="#">grievance list</a> and <a href="#">report</a> on the case.</li> <li>• Cargill responded to points raised in the allegation. The case has been settled with the complainant and the Asam Besar communities and closed by the RSPO Complaints Panel in September 2020. More detailed information can be found on the <a href="#">RSPO case tracker</a> and Cargill's public response to the report <a href="#">here</a>.</li> <li>• Both suppliers have followed the independent complaints process at the RSPO, and information on the process is available publicly on the RSPO website and suppliers' website.</li> </ul>
A13	May 2020	Mighty Earth	<p><b>Allegations of NDPE noncompliance</b></p> <p>Mighty Earth raised its Rapid Response (RR) report number <a href="#">27</a> (May 2020), <a href="#">28</a>, (June 2020), and <a href="#">29</a> (July 2020).</p> <p>Cases involving a direct supplier we reviewed to be in scope of our grievance process is Gawi (RR 27) through our previous link with PT Karyaindah Alam Sejahtera.</p>	PT Karyaindah Alam Sejahtera (part of Gawi) is no longer a Unilever direct supplier since Q2 2020.	<ul style="list-style-type: none"> <li>• Unilever ran a review on all cases raised in the Rapid Response reports, by comparing allegations with Unilever's internal deforestation alert and monitoring system with supply chain links to Unilever. We excluded cases in which there was insufficient information in the report to be verified (e.g., lack of precise location of where the alleged case deforestation took place) and palm oil companies on which Unilever had already imposed a procurement suspension.</li> <li>• Previously in March 2020, Unilever had reached out to Gawi on the clearing in its concession PT Indopenta Sejahtera Abadi detected through our internal deforestation alert and monitoring system.</li> </ul>

			Cases involving allegations of third-party or indirect suppliers in the RR are found in ref. B24.		<ul style="list-style-type: none"> <li>Unilever no longer sources directly from PT Karyaindah Alam Sejahtera at a group level (Gawi).</li> </ul>
A12	November 2019	Greenpeace	<p><b>Allegations of noncompliance with regards to forest fires</b></p> <p>Greenpeace published a report titled "<a href="#">Burning down the house</a>" with allegations that consumer goods companies including Unilever are purchasing palm oil from producers linked to forest fires and operations subject to court action, administrative sanctions, or other government intervention as a result of fires in the past few years.</p> <p>A related <a href="#">press release</a> on transboundary haze was also published in November 2019.</p>	<p>Several Unilever direct suppliers were mentioned in the report:</p> <ul style="list-style-type: none"> <li>Cargill</li> <li>GAR/Sinar Mas</li> <li>KLK</li> <li>Musim Mas</li> <li>Perkebunan Nusantara (PTPN)</li> <li>Sime Darby</li> <li>Wilmar</li> </ul> <p>The remaining suppliers listed, while not direct suppliers to Unilever, may still be indirectly linked to the Unilever supply chain. See B21.</p>	<ul style="list-style-type: none"> <li>Prior to the report's publication on November 4, Greenpeace sent Unilever a letter detailing a new publication on October 30 (2019).</li> <li>Unilever reached out to its direct suppliers to verify the allegations: Apical, Cargill, KLK, Musim Mas, PTPN, Sime Darby, GAR, and Wilmar, requesting clarification on fires and hotspots in the suppliers' direct operations, sealed operations or fines, links to third-party suppliers linked to forest fires in 2015-2018, and burnt areas in 2019 detected by Unilever's monitoring (November 2019).</li> <li><b>Wilmar</b> sent a <a href="#">sustainability brief</a> on the matter (October 2019).</li> <li><b>Musim Mas</b> sent a letter to buyers clarifying data cited in the report, including on allegations of burnt area and hotspots in its concessions between 2015-2018 (November 2019). Similar details on the clarification can be found on a Musim Mas statement <a href="#">here</a>.</li> <li><b>KLK</b> clarified following an earlier <a href="#">public statement</a> (September 2019) that, in the case of PT Adei, KLK was found negligent in not preventing perpetrators from starting a fire in the plasma area. The reported sentencing of PT Adei's directors were not fire-related but rather for operating the plantation without a permit (IUP) despite the area being a joint community project and owned by the community. Investigation for 2019 fires at PT Adei is still ongoing.</li> <li><b>GAR</b>, with regards to Greenpeace allegations, had published a <a href="#">statement</a> responding to the report (November 2019). In addition to these allegations, Unilever inquired about two concessions where significant peat fires were detected in 2019. GAR had documented these incidences in its <a href="#">Fire Incident Report</a> online and provided information on its actions to put out the fire and prevent future fires and maintain peat hydrology under drought conditions.</li> <li><b>Sime Darby</b> issued a <a href="#">statement</a> prior to the Greenpeace haze press release, which includes clarification on the data sources and method in its hotspots monitoring, available publicly on its <a href="#">hotspots dashboard</a>. Responding to Unilever, Sime Darby provided number of hotspots monitored, causes of these hotspots as a result of investigation, and supply chain links to third-party suppliers listed in the report. Sime Darby had also released a <a href="#">statement</a> with regards to allegations surrounding PT Sime Indo Agro (SIA).</li> <li><b>Cargill</b> responded by outlining action plans taken if a fire inside plantation is detected and stated that recent reports were started "in enclaved areas owned by the community" and despite not</li> </ul>

					<p>having control over actions of the communities, they deployed fire-fighting team to fight the fires.</p> <ul style="list-style-type: none"> <li>• <b>PTPN III</b> Holdings Secretariat responded to Unilever that the allegations had not been raised to them directly. PTPN Holdings stated it has not opened a new land in 2015-2018, and new planting and conversion to palm are undertaken using a no-burning principle. They will investigate the allegation of burned areas between 2015-2018. PTPN stated it monitors hotspots and mobilizes emergency teams when fires are detected.</li> <li>• Unilever takes this issue seriously and will continue to engage with its suppliers to resolve any noncompliance regarding fires.</li> <li>• Unilever’s work with Earth Equalizer and Aidenvironment allows us to investigate peat and forest burnt areas via satellite images, and we will be investigating further with regards to burned areas within our suppliers’ plantations that were subsequently planted with oil palm. We are also involved in other deforestation monitoring initiatives and recently invested in supporting earlier detection of deforestation using radar waves which will be made available through <a href="#">WRI’s Global Forest Watch</a> platform. Finally, we are engaging with the RSPO on cases related to RSPO members.</li> </ul>
A11	April 2019	LinkAR-Borneo	<p><b>Allegations of land conflict</b> LinkAR-Borneo contacted Unilever to report an allegation that the Cargill subsidiary PT Poliplant Sejahtera (PSA) in West Kalimantan has not fully compensated a farmer for his plot inside the estate according to the agreed conditions of ownership transfer since 2009. The farmer was imprisoned at the end of 2018 for harvesting palm in the plot he used to own. The case is being processed in the local district court.</p>	Cargill	<ul style="list-style-type: none"> <li>• In April 2019, Unilever responded to LinkAR-Borneo and contacted Cargill for clarifications.</li> <li>• Cargill responded that it acquired PT PSA in 2015, and evidence of negotiations and agreements between the previous management, the farmer, the village head, and other parties about the land was documented in the due diligence process. This includes a notarized acknowledgment of ownership transfer signed by the farmer.</li> <li>• Unilever met with Cargill in April 2019.</li> <li>• Unilever has connected LinkAR-Borneo to Cargill and discussions regarding the grievance will continue between the two parties.</li> <li>• In July 2019, Cargill and LinkAR-Borneo had agreed to meet. More information can be found on Cargill’s <a href="#">grievance list</a>. Unilever last reached out to Cargill in February 2020 to request updates on their engagement with the grievance raiser.</li> <li>• RSPO issued a <a href="#">decision letter</a> to both parties noting the closure of this complaint (September 2020).</li> </ul>
A10	March 2019	Forest Peoples Programme, TUK Indonesia	<p><b>Allegations of land conflict</b> In March 2019, FPP published a <a href="#">press release</a> with allegations that PT Mitra Austral Sejahtera (MAS), a Sime Darby subsidiary, has</p>	Sime Darby Plantation	<ul style="list-style-type: none"> <li>• In April 2019, Unilever engaged Sime Darby to request clarification on the allegations.</li> <li>• Sime Darby responded confirming Sime Darby’s intention to sell PT MAS, per a <a href="#">statement</a> on Sime Darby’s website.</li> </ul>

			<p>not fulfilled its responsibility to resolve the land conflict since 1999 with the Dayak Hibun indigenous people in Kerunang and Entapang, West Kalimantan. Sime Darby is reported to have divested from PT MAS.</p> <p>In May 2019, FFP and TUK Indonesia filed a formal grievance to Unilever.</p>		<ul style="list-style-type: none"> <li>• Unilever requested more information regarding the statement.</li> <li>• Unilever is also monitoring the progress of this case at the RSPO Complaints Panel. RSPO has previously issued a <a href="#">letter</a> on Sime Darby's plans to divest from PT MAS.</li> <li>• Unilever further discussed this with Sime Darby in June 2019.</li> <li>• After further legal review, in which Unilever sought third-party legal advice, Unilever found the grievance to be outside of Unilever's supply chain at the time it was raised to Unilever.</li> <li>• The RSPO Secretariat has finalised the legal review of parties involved and is preparing a Briefing Note (March 2020).</li> <li>• RSPO Complaints Panel <a href="#">final directive</a> was furnished to both parties (July 2021).</li> </ul>
A9	November 2018	Chain Reaction Research	<p><b>Absence of NDPE policies allegation</b></p> <p>In November 2018, Chain Reaction Research reached out to Unilever with a draft of their report "<a href="#">Leakage Risks in India, 58 Percent of Palm Oil Imports Not Covered by NDPE Policies</a>".</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"> <li>• Unilever engaged with Chain Reaction Research regarding the publication of the report (November 2018).</li> <li>• Unilever has reached out to Emami Agrotech to understand their response to 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).</li> <li>• Unilever is following up on this allegation with Emami in May 2019.</li> <li>• Unilever's last shipment from Emami was in H1 2018, and currently has no direct contract with Emami.</li> </ul>
A8	June 2018	Greenpeace	<p><b>NDPE non-compliance allegation</b></p> <p>Greenpeace report titled "<a href="#">Rogue Trader</a>", 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 "<a href="#">Final Countdown</a>" (see B15).</p>	Wilmar	<ul style="list-style-type: none"> <li>• Wilmar provided Unilever with a letter regarding its response to Greenpeace on the "Rogue Trader" report (June 2018). Wilmar had ceased sourcing from the GAMA group.</li> <li>• Wilmar has written to the suppliers allegedly linked to the "GAMA Group" to clarify the allegations. Progress in the cases involving Wilmar's supply base can be found on <a href="#">Wilmar's grievance list</a>.</li> <li>• GAMA and Aidenvironment entered a collaborative agreement to develop and implement a sustainability policy framework. A full joint statement is provided <a href="#">here</a>.</li> <li>• The GAMA <a href="#">NDPE policy</a> was released in September 2018.</li> <li>• Gama/KPN issued its first NDPE <a href="#">progress report</a> in February 2019.</li> <li>• Wilmar had stated that, based on a review of progress and after consultation with Aidenvironment on the group's performance and commitment, that it is lifting the suspension on GAMA in March 2019. More information is available on <a href="#">Wilmar's grievance list</a>.</li> </ul>

A7	May 2018	Greenpeace	<p><b>NDPE non-compliance allegation</b> In a letter to major palm oil buyers, Greenpeace listed alleged 26 NDPE non-compliant palm oil producer groups (May 2018).</p> <p>In September 2018, Greenpeace published "<a href="#">Final Countdown</a>," 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"> <li>• Bunge/IOI</li> <li>• Wilmar</li> </ul> <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"> <li>• Bunge/IOI</li> <li>• Wilmar</li> <li>• Sime Darby</li> <li>• KLK</li> <li>• GAR</li> <li>• Apical</li> <li>• Cargill</li> <li>• Musim Mas</li> </ul> <p>See B15.</p>	<ul style="list-style-type: none"> <li>• 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 concerning each supplier on the list (June 2018).</li> <li>• 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).</li> <li>• Unilever engaged independent consultants to identify which mills of the listed companies are in Unilever's mills list, to get better clarity of how the listed companies may be within Unilever's supply chain (June 2018).</li> <li>• Unilever issued a response to the Greenpeace campaign "Final Countdown" (September 2018).</li> <li>• 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.</li> <li>• 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 <a href="#">grievance list</a> September 2018, IOI Group, RSPO). In September 2018, Bunge issued a <a href="#">response</a> to the "Final Countdown" report, which they communicated to Unilever.</li> <li>• Wilmar responded to Greenpeace with a document also shared with Unilever. Wilmar outlined engagements with the listed companies on their public <a href="#">grievance list</a>. As a response to the "Final Countdown" report, Wilmar issued a <a href="#">public statement</a>, which they also communicated to Unilever (September 2018).</li> <li>• 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 <a href="#">grievance list</a>. With regards to the "Final Countdown" report, GAR issued an advisory to its customers (September 2018).</li> <li>• GAR contacted Bumitama Agri with regards to the Final Countdown report in September 2018 and in October 2018, GAR met Bumitama for an update. For further details, please see: <a href="http://bit.ly/2U9G9Qn">http://bit.ly/2U9G9Qn</a> and <a href="#">GAR Grievance List</a>.</li> </ul>
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					<ul style="list-style-type: none"> <li>• 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 <a href="#">grievance list</a>. Cargill issued a statement to buyers responding to the “Final Countdown” report (September 2018).</li> <li>• On the Final Countdown report, IOI published its <a href="#">official statement</a> (October 2018).</li> <li>• Musim Mas issued a response to Unilever. Engagements with the listed companies are also available on their public <a href="#">grievance list</a>.</li> <li>• We have been informed that Apical is engaging directly with Greenpeace on these allegations.</li> <li>• Sime Darby and KLK issued a response to Unilever, and they are working on these allegations. More information is outlined in Sime Darby’s <a href="#">Grievance Register</a> and KLK’s <a href="#">Grievance List</a>.</li> <li>• In December 2018, Wilmar and Aidenvironment issued a <a href="#">joint statement</a> on a new supplier monitoring and engagement programme that aims to accelerate efforts towards a deforestation-free palm oil industry. Unilever and Mondelez are supporting signatories to the joint statement.</li> <li>• Unilever sent an email to all of Unilever’s direct palm oil suppliers, reinforcing compliance to Unilever’s Sustainable Palm Oil Sourcing Policy by stating that: in the event an allegation of a breach on No Deforestation, No Peat and No Exploitation (NDPE) commitments is found, then, consistent with a verification process, the allegation must be verified by the supplier with its direct and indirect third parties in a timely manner, and if there is confirmation of non-compliance, or a lack of substantive response to the verification process, then consistent with Unilever’s published Grievance Procedure, Unilever requires its direct suppliers to impose a procurement suspension of the direct or indirect third-party palm oil supplier from supplies to Unilever’s supply chain (April 2019).</li> </ul>
A6	November 2016	Rainforest Action Network (RAN)	<p><b>Deforestation in Leuser Ecosystem (Aceh) allegation</b></p> <p>RAN released a report "<a href="#">Protecting the Leuser Ecosystem</a>" (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>Unilever does not have any direct business relationship with PT Surya Panen Subur II (PT SPS II) but may be exposed to the company through its suppliers. In the reports, RAN highlighted three of</p>	<ul style="list-style-type: none"> <li>• Unilever has been engaging with RAN and major direct suppliers on this grievance.</li> <li>• 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 priority for the landscape approach “Areal Prioritas Transformasi (APT). These APT areas were included in a deforestation monitoring initiative developed by TFT and partners.</li> </ul>



			<p>The Rainforest Action Network (RAN) through the <a href="#">Leuser Watch</a> 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 <a href="#">guilty</a> by the State Prosecutor’s Office of clearing of peat forests (2016). In a May 2018 case study, RAN has further <a href="#">reported</a> 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>In May 2019, RAN submitted to Unilever ongoing grievances on twelve palm oil companies in Aceh Timur that have allegedly continued clearing forests within the Leuser Ecosystem in 2019. For more information on these companies, see B19.</p> <p>In September 2019, RAN published “The Last of the Leuser Lowlands” a report alleging link between palm fruits harvested in the Rawa Singkil Wildlife Reserve and the supply chain of brands such as Unilever. For more information on this report, see B20.</p>	<p>Unilever’s suppliers: Wilmar, Musim Mas, and Golden Agri. Other suppliers and traders include ADM, Bunge, Cargill, and Sime Darby.</p> <p>Unilever does not have any direct business relationship with any of the twelve companies raised by RAN in May 2019 but may be exposed to the company through its direct suppliers.</p>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• Musim Mas does not list SPS II in their grievance list but have engaged with other suppliers in the Singkil regency (Pati Sari, Sisirau, Mopoli Raya, Ensem Sawita, Ensem Lestari, Bangun Sempura Lestari). In August 2017, Ensem Sawita (supplier to Wilmar and Musim Mas) confirmed that all purchasing from PT ABN had ceased (see B5).</li> <li>• 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 <a href="#">Musim Mas grievance list</a> (September 2017).</li> <li>• GAR supported PT SPS in their Collaboration for Transformation (CFT) programme, which completed conflict resolution process implementation (December 2017).</li> <li>• 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).</li> <li>• 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 <a href="#">GAR grievance list</a>.</li> <li>• 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 <a href="#">grievance list</a>.</li> <li>• 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.</li> <li>• Unilever reached out to direct suppliers to understand their sourcing relationships with PT SPS II. Most of Unilever’s direct</li> </ul>
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					<p>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).</p> <ul style="list-style-type: none"> <li>• ADM did not directly source from PT SPS II. ADM’s engagement with their direct suppliers is available on their <a href="#">Grievance Log</a> (October 2018).</li> <li>• Bunge does not directly supply from the area but may be indirectly exposed through traders. As of December 2018, PT SPS II is no longer in Bunge’s supply chain. Source: Bunge Loders Croklaan <a href="#">grievance list</a>.</li> <li>• Cargill will be discussing with direct suppliers on milestones required for SPS II to demonstrate compliance with their policy. Surya Panen Subur II is no longer in Cargill’s supply chain. Source: <a href="#">Cargill indirect grievance list</a>.</li> <li>• GAR and Foresthints had a meeting to discuss next steps regarding the Foresthints reports (<a href="http://bit.ly/2Qv6KFm">http://bit.ly/2Qv6KFm</a> and <a href="http://bit.ly/2SQ9mit">http://bit.ly/2SQ9mit</a>), and agreed on a joint field verification visit to the areas relevant to the grievance in SPS II concession. Results and recommendations from the verification visits are available on <a href="#">GAR Grievance List</a> (August 2018).</li> <li>• 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 <a href="#">GAR Grievance List</a> (November 2018).</li> <li>• With regards to new clearings identified and raised in May 2019, Unilever has notified its direct suppliers with potential sourcing links to the area. Unilever also works with Aidenvironment to verify the allegations via its deforestation reports and deployment of field teams.</li> <li>• GAR responded to Unilever with information that eleven of the companies identified in the May 2019 grievance are not linked to their supply chain, and they are engaging the remaining one supplier on the allegation (May 2019).</li> <li>• Unilever has signed a MoU with IDH Sustainable Trade Initiative in Indonesia <a href="#">to support a landscape program to better address the challenges in the Leuser Ecosystem</a> in Aceh. The landscape project will initially start in Aceh Tamiang collaborating with various stakeholders including local governments, civil society</li> </ul>
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					organizations, and the private sector to address systemic issues on deforestation and sustainable agriculture (October 2019).
A5	November 2016	Amnesty International	<p><b>Non-compliant labor and working conditions allegation</b></p> <p>Amnesty report titled <a href="#">“The Great Palm Oil Scandal”</a> reports allegations surrounding labor conditions in Wilmar’s direct and indirect operations (November 2016).</p> <p><a href="#">Amnesty report</a> 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"> <li>• Unilever issued a <a href="#">public response</a> to the report (November 2016).</li> <li>• Unilever has engaged with Amnesty International and Wilmar to discuss the allegations and action plans to take in 2017.</li> <li>• <a href="#">Wilmar published an update</a> on pushing for industry wide collaboration with Verite and BSR, and released an <a href="#">action plan</a> for PT Perkebunan Milano and PT Daya Labuan Indah (April 2017).</li> <li>• Internal investigation was carried out by the Wilmar Sustainability team (May 2017).</li> <li>• Unilever participated in a BSR social sustainability workshop held by Wilmar for its main suppliers (November 2017).</li> <li>• Wilmar released a <a href="#">12-month progress report</a> (December 2017).</li> <li>• Wilmar issued an <a href="#">update</a> that they are working with Verité to review and improve the living and working environment of their employees (February 2018).</li> <li>• Amnesty sent a letter to major buyers of Wilmar regarding follow up action of the report (March 2018), to which <a href="#">Unilever replied with a public response</a> (March 2018).</li> <li>• Wilmar continued to engage with Amnesty International (June 2018).</li> <li>• Wilmar issued a <a href="#">two-year progress report</a> (November 2018).</li> <li>• Verite issued an <a href="#">update</a> on Wilmar’s program (November 2018).</li> <li>• Amnesty sent an update letter to Unilever on the case (March 2019).</li> <li>• Wilmar reached out to its stakeholders on the actions taken in an update to all parties (March 2019). In this update, reference was made to the five points raised by Amnesty International, as well as previous updates sent to stakeholders in November 2018.</li> </ul>
A4	April 2016	Eyes on the Forest (EoF)	<p><b>Allegation of sourcing of FFB from national park encroachment in Riau</b></p> <p>Eyes on the Forest published <a href="#">“Enough is Enough”</a> 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, <a href="#">“No one is safe”</a> published in 2016.</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"> <li>• Wilmar</li> <li>• Musim Mas</li> </ul>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• 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 <a href="#">here</a> (May 2018).</li> <li>• Unilever conducted an internal review of the grievance. Unilever and other brands also met with WWF to discuss the possible next steps (July 2018).</li> </ul>

			<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>	<ul style="list-style-type: none"> <li>• Golden Agri Resources (GAR)</li> <li>• RGE (Apical, Asian Agri).</li> </ul> <p>Some Unilever suppliers do not directly source from the area, but palm oil within the scope of the grievance might enter their supply chain through traders. These are:</p> <ul style="list-style-type: none"> <li>• ADM</li> <li>• Cargill</li> <li>• Bunge Loders Croklaan/IOI</li> <li>• Louis Dreyfus</li> <li>• Sime Darby.</li> </ul>	<ul style="list-style-type: none"> <li>• Wilmar, in their <a href="#">Grievance List</a>, 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).</li> <li>• 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).</li> <li>• Unilever met with WWF, palm oil traders, and palm oil buyers to discuss potential collaboration in the Tesso Nilo area (November 2018).</li> <li>• 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 civil society group, Setara Jambi for a traceability to plantation project. The progress is made available on Apical’s <a href="#">public grievances</a>.</li> <li>• 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 updates available <a href="#">here</a>.</li> <li>• 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).</li> <li>• GAR and EOF had a meeting to discuss "Enough is Enough" report and action plan on landscape approach. For more information, please see <a href="#">GAR Grievance List</a> (July 2018).</li> <li>• 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. GAR met PT MAS management to ask for a stronger commitment on traceability to plantation (TTP). PT MAS stated it had achieved 30% TTP as of October 2018 and agreed to reach 100% TTP by end of Q1 2019. PT MAS also welcomed GAR's plan to support them in achieving the full traceability to the</li> </ul>
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					<p>plantation in CFT programme. For more information, please see <a href="#">GAR Grievance List</a> (October 2018).</p> <ul style="list-style-type: none"> <li>• GAR reviewed the TTP of BIM, MAS, PSJ, PAJ, TS, SMN, and SRJ, and expects all to reach 100% TTP by July 2019. Refer to GAR's <a href="#">Grievance List</a> (February 2019).</li> <li>• ADM had clarified on their <a href="#">Grievance Log</a> that they do not source directly from the area, and have engaged with the relevant suppliers to understand their suppliers' actions.</li> <li>• 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 <a href="#">Grievance List</a>. Cargill advises 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.</li> <li>• Bunge does not directly source from the area and is working closely with its suppliers to address allegations related to indirect exposure.</li> <li>• 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.</li> </ul> <p>To address high risk mills and better resource management in the area, Unilever has been conducting site verifications of palm oil mills that have been identified as being in areas of high environmental risk, together with Proforest and Daemeter. This builds off of other site verification activities that have been conducted by Unilever suppliers. Unilever is also in part of a coalition of palm oil growers, traders, and buyers supporting a landscape project that involves the local government and civil society organizations focusing in the districts of Siak and Pelalawan in Riau. More information can be found <a href="#">here</a>.</p>
A3	April 2015	Forest Peoples Programme (FPP), LinkAR-Borneo	<p><b>Alleged issue concerning land rights in new concessions</b></p> <p><a href="#">Forest Peoples Programme published allegations in a statement titled "Golden Agri-Resources still in violation of RSPO standards"</a> (April 2015). This is with regards to prior complaints raised to the RSPO about PT Kartika Pratama Cipta, a GAR subsidiary.</p>	Golden Agri Resources (GAR)	<p><b>On PT KPC:</b></p> <ul style="list-style-type: none"> <li>• Unilever has engaged FPP and GAR to discuss allegations and action plans to take in 2017. GAR stated that it is continuing active dialogue with FPP.</li> <li>• GAR released quarterly complaint progress reports, available to access on the <a href="#">RSPO Complaints Panel</a> site. In its latest <a href="#">(Q4 2018) report</a>, GAR reported completion of major actions and ongoing progress in implementing FPIC remediation, and requested RSPO to close the complaint for monitoring.</li> </ul>

			<p><a href="#">Forest Peoples Programme published allegations in a joint statement</a> 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"> <li>GAR provided an update to Unilever that it awaited RSPO's instructions for a further review of the HCV assessments and related management and monitoring plans (February 2019).</li> </ul> <p><b>On PT SMS:</b></p> <ul style="list-style-type: none"> <li>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 <a href="#">GAR Grievance List</a>.</li> </ul>
A2	2014	Rainforest Action Network (RAN)	<p><b>Deforestation and human rights violations allegation</b></p> <p>2014 RAN report "<a href="#">Conflict Palm Oil in Practice</a>" 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 labor and deforestation risks in its Indonesian and global operations.</p> <p><a href="#">RAN recommended customers and financiers</a> to require KLK to take several 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 "<a href="#">Still Cooking the Climate</a>" (November 2017).</p>	Kuala Lumpur Kepong (KLK)	<ul style="list-style-type: none"> <li><a href="#">KLK provided updates on actions taken (March 2016)</a>.</li> <li>KLK had performed participatory mapping exercise in Liberia as reported in <a href="#">Sustainability Report</a> (March 2017).</li> <li><a href="#">KLK commits to address issues</a> raised by RAN (March 2017).</li> <li>Unilever sent a letter to KLK in August 2017, followed by a meeting in Singapore in September 2017.</li> <li>KLK provided updates to Unilever regarding grievances in their supply chain in August and November 2018.</li> <li>KLK has reviewed and updated its <a href="#">Sustainability Policy</a>, outlining timelines and deliverables to demonstrate the Group's environmental, social, traceability, governance, compliance, and monitoring commitments. The statement is available <a href="#">here</a> (August 2018).</li> <li>Following good progress, Unilever considered the grievance closed for monitoring of the supplier's implementation of commitments.</li> </ul>
A1	2010	Greenpeace, Rainforest Action Network (RAN), Forest Peoples Programme, Grassroots coalition ( <i>Pelita case</i> )	<p><b>Community rights and deforestation issues allegation</b></p> <ul style="list-style-type: none"> <li><a href="#">IOI Pelita case</a> 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).</li> <li><a href="#">IOI concessions in Ketapang, West Kalimantan case</a> raised in the RSPO Complaint Panel in 2015 a grievance</li> </ul>	IOI Group	<p>After the acquisition of IOI by Bunge in 2018, Unilever's direct relationship goes mostly through Bunge Loders Croklaan.</p> <ul style="list-style-type: none"> <li>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).</li> <li>IOI and Aidenvironment issued a <a href="#">joint statement</a> on the closure of the Ketapang complaints (December 2016).</li> <li>Unilever discussed with RAN, Grassroots, and IOI (directly and via email) about the allegations.</li> <li><a href="#">Greenpeace officially halts campaign against IOI</a> that has 'come a long way' (April 2017).</li> </ul>

		<p>Aidenvironment <b>(Ketapang case)</b></p>	<p>related to alleged land clearing and illegal planting (2015).</p> <ul style="list-style-type: none"> <li>The IOI Pelita allegations are briefly mentioned in the Greenpeace 2017 report "Dirty Bankers".</li> </ul>		<ul style="list-style-type: none"> <li>IOI explored the Terms of Reference for an <a href="#">independent IOI Sustainability Advisory</a> Panel (May 2017).</li> <li>IOI published a <a href="#">Sustainability Implementation Plan</a> (July 2017) and a <a href="#">Sustainability Progress Update</a> (August 2017).</li> <li><a href="#">Unilever resumed palm oil sourcing</a> from IOI Group (August 2017) following good progress. Since 2017, IOI reports quarterly through implementation of its <a href="#">Group Sustainability Palm Oil Plan</a>.</li> <li>On the Pelita case, IOI and Grassroots worked on a joint action plan which was reviewed by Pelita and submitted to the <a href="#">RSPO</a>. The action plan underwent review by the RSPO, who asked for clarification on Grassroots' role as complainant (December 2017).</li> <li>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).</li> <li>Pelita resolution plan received a conditional endorsement by the RSPO Complaints Panel (June 2018).</li> <li>IOI went ahead to socialize the plan to eleven communities involved in the dispute, June - July 2018. The socialization update is provided <a href="#">here</a> (July 2018).</li> <li>RSPO Complaints Panel officially closed the complaint case on its plantation subsidiary companies in Ketapang, Indonesia (October 2018). Release from IOI <a href="#">here</a>.</li> <li>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 <a href="#">RSPO case</a> is still open.</li> <li>In February 2019, RSPO issued a <a href="#">directive letter</a> to IOI, commending efforts in engagement that result in the obtaining of 8 communities' consent to the resolution plan. RSPO noted IOI can proceed with the first stage of the plan, but all communities need to be on board before stage two in line with FPIC requirements.</li> </ul>
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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
B44	Mar 2023	--	<b>Clarification on deforestation alerts detected by a satellite monitoring provider</b>	<ul style="list-style-type: none"> <li>Unilever has no direct sourcing relationship with</li> </ul>	<ul style="list-style-type: none"> <li>We requested our sustainability partners to verify the alerts and ownership attribution. In cases where we have direct sourcing</li> </ul>

			<p>Unilever is following up on deforestation alerts detected by a monitoring provider which we received through our stakeholders. Two documents contained nine alerts detected in 2021 were alleged to be linked to the Unilever supply chain.</p>	<p>Triputra, Sumber Tani Agung, Union Sampoerna, Yayasan Sabah, Bumitama, and Sentosa Kalimantan Jaya. However, these oil palm growers may be connected to our direct suppliers.</p> <p>Permata Sawit Mandiri and Samling are not Unilever suppliers. Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<p>relationship with the integrated supplier, we reached out directly (December 2022).</p> <ul style="list-style-type: none"> <li>• In three cases, namely those concerning Wilmar, Triputra, and Sumber Tani Agung, clearing took place outside of concession boundaries. Grievance was therefore not upheld.</li> <li>• In the case on Union Sampoerna, our supplier Wilmar has clarified based on their investigation that the area cleared was shrubs and not classified as forest based on a 2014 HCV report and land cover analysis. Grievance was not upheld.</li> <li>• In two other cases, Yayasan Sabah and Bumitama, clearing was not done for palm and/or not done by the concession holder. Bumitama had reported on the matter to the RSPO. We continue to monitor the actions taken on these concessions. See also: B33.</li> <li>• Two cases involve suppliers that are not in the supply chain and have been on Unilever's No-Buy List since 2020. These are PT Permata Sawit Mandiri and Samling.</li> <li>• We are engaging our supplier Wilmar on the remaining case on alerts detected at PT Sentosa Kalimantan Jaya (March 2023).</li> </ul>
B43	Mar 2023	Mighty Earth	<p><b>Rapid Response 41</b></p> <p>Allegations of noncompliant forest clearing tied to palm oil producers. Full report <a href="#">here</a>.</p>	<ul style="list-style-type: none"> <li>• Unilever has no direct sourcing relationship with Hardaya Inti Plantations/Central Cipta Murdaya (CCM) group but may be exposed through our suppliers.</li> <li>• Unilever has no known supply chain link to the Mukti Group and the Shin Yang Group.</li> </ul> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• We investigated our supply chain link through relevant suppliers based on verification of the alerts and ownership attribution by our sustainability partners (March 2023).</li> <li>• Unilever supplier Wilmar has engaged PT Sebuku Inti Plantation (SIP), CCM group, on the issue and clarified in its <a href="#">ineligible grievances list</a> that the location of the alert is not within a forested area and has previously been cultivated by the communities. PT SIP is reported to have adopted a moratorium on land clearing since February 2023 (March 2023).</li> <li>• Unilever placed the Shin Yang group on its no-buy list in April 2020, and while we received information that a mill is receiving supply from the group, we currently find no supply chain link to the mill. Grievance was therefore not upheld.</li> </ul>



B42	Feb 2023	Rainforest Action Network	<p><b>Allegations of noncompliant sourcing</b></p> <p>RAN <a href="#">investigation</a> alleged that palm oil originating from deforesting concessions on the Leuser Ecosystem have been sold through a new palm oil trader.</p>	<p>Unilever has no known supply chain link to PT PT. Inno-Wangsa Oils &amp; Fat or other subsidiaries of the Tanimas Group.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• Unilever reached out to our deforestation monitoring partners to investigate the allegations and any supply chain link to the company on a group level.</li> <li>• We currently find no supply chain link to the Tanimas Group. Grievance was therefore not upheld.</li> <li>• We will continue to ensure no palm oil from noncompliant and suspended sources in the Leuser Ecosystem is linked to the Unilever supply chain, before steps are taken by the responsible party to assess and remediate the noncompliance.</li> </ul>
B41	Feb 2023	Rainforest Action Network	<p><b>Allegation of land rights violation in group-associated companies</b></p> <p>Letter to Unilever alleges violation of customary land rights in supplier group-associated timber companies.</p>	<p>Unilever has no direct sourcing relationship with Bumitama, but may be exposed through our suppliers.</p> <p>Unilever has no sourcing from the Harita group, and its associated timber companies PT. Rodamas Timber Kalimantan (RTK) and PT. Kemakmuran Berkah Timber (KBT).</p>	<ul style="list-style-type: none"> <li>• Unilever reached out to Bumitama.to obtain further information and clarification on the allegations raised (February 2023).</li> <li>• We investigated our paper and packaging supply chain and found no materials originating from the companies associated with the Harita group.</li> <li>• Bumitama published a <a href="#">response</a> on its website. Harita Group issued a <a href="#">response</a> to RAN (February 2023).</li> <li>• We reiterated our support, through Bumitama, for the timber companies to address stakeholders request to release relevant documents that support the confirmation, or formalization, of the cancellation of logging activities in areas identified as customary lands of the Long Isun.</li> </ul>
B40	Sept 2022	Global Witness	<p><b>Allegation of human rights violations</b></p> <p>Global Witness reported in <a href="#">an article</a> on allegations of human rights and land rights violations linked to two palm oil producers in Brazil, Brasil Biofuels (BBF), and Agropalma (see case A17).</p>	<p>Unilever has no direct sourcing relationship with Brasil Biofuels but may be exposed through our suppliers.</p>	<ul style="list-style-type: none"> <li>• Upon receiving the article, Unilever reached out to its sole supplier through which indirect link with BBF is indicated (September 2022).</li> <li>• The supplier, Cargill, has suspended BBF effective in October 2022, as stated to the Business &amp; Human Rights Resource Centre (BHRRC). More information <a href="#">here</a>.</li> </ul>
B39	Sept 2022	Rainforest Action Network	<p><b>Allegation of noncompliant sourcing from Rawa Singkil Wildlife Reserve with links to the Unilever supply chain</b></p>	<p>Unilever has no direct sourcing relationship with PT Global Sawit Semesta (GSS), PT Runding Putra Persada (RPP), and PT Bangun</p>	<ul style="list-style-type: none"> <li>• Unilever engaged with its suppliers with indicated link to third party mills mentioned in the report (October 2022).</li> <li>• PT GSS sent Apical a <a href="#">clarification letter</a>, stating steps it has taken to address the grievance allegations (September 2022).</li> <li>• Our direct supplier GAR no longer sources from PT BSL since December 2021 and did not supply PT GSS to Unilever since 2021.</li> </ul>

			<p>RAN published a <a href="#">report</a> alleging FFB originating from inside Rawa Singkil was supplied to mills in Aceh, that are supplying Unilever suppliers.</p> <p>RAN published a follow-up <a href="#">article</a> on its website (October 2022).</p>	<p>Sempurna Lestari (PT BSL) but may be exposed to the companies through direct suppliers.</p>	<ul style="list-style-type: none"> <li>• GAR is engaging with PT RPP and arranged a verification of palm operations mentioned in the report beyond what is indicated in the land ownership title of Mr. Mahmudin (Sertifikat Hak Milik, SHM), the broker, and the surrounding area (October 2022).</li> <li>• Result of the investigation conducted by GAR and Wilmar, and action plan for Mr. Mahmudin, CV Buana Indah, and PT RPP is published on GAR's grievance list, linked <a href="#">here</a> (November 2022).</li> <li>• Unilever remains committed to supporting a landscape program in the Leuser Ecosystem in Aceh with <a href="#">IDH</a> Sustainable Trade Initiative, and other partners, suppliers, and stakeholders. The programs focus on protection and restoration, improving deforestation monitoring, and supporting livelihoods.</li> </ul>
B38	July 2022	Mighty Earth	<b>Rapid Response 40</b>	<p>Unilever has no direct sourcing with PT Khatulistiwa Agro Abadi, PT Arjuna Utama Sawit, and PT Borneo International Anugerah (First Borneo group).</p>	<ul style="list-style-type: none"> <li>• Our supplier GAR engaged with the companies in question and deemed the supplier non-compliant. More information on GAR's <a href="#">grievance list</a> (October 2022). GAR has not included palm materials from PT AUS in its supply to Unilever.</li> <li>• Unilever will also be engaging with its suppliers located outside of Indonesia who are exposed to supply from PT AUS through trade.</li> </ul>
B37	May 2022	Mighty Earth	<b>Rapid Response 39</b>	<p>Allegation of noncompliant clearing at PT Sawit Sukses Sejati (SSS), owned by Jalan Abesin Ltd. Full report <a href="#">here</a>.</p>	<ul style="list-style-type: none"> <li>• We investigated our supply chain link through relevant suppliers based on verification of the alerts and ownership attribution by our sustainability partners.</li> <li>• With regards to allegations of supply link via Sumber Tani Agung (STA), Unilever suppliers have engaged with STA directly and confirmed currently there is no supply from SSS to STA. Find more information on <a href="#">Wilmar</a> and <a href="#">GAR</a> grievance lists.</li> </ul>
B36	March 2022	Friends of the Earth and WALHI	<b>Allegation of noncompliance with regards to land rights and NDPE</b>	<p>Unilever has no direct sourcing with Astra Agro Lestari but may be exposed through our direct suppliers.</p>	<ul style="list-style-type: none"> <li>• We have received the report and are engaging with our relevant suppliers on the issue (March 2022).</li> <li>• With regards to PT Agro Nusa Abadi (ANA), see also case B27.</li> <li>• We received written responses through our direct suppliers on the issue of land rights, environment, and governance.</li> <li>• We have also engaged Astra directly on the allegations raised, with a focus on having the case independently reviewed (May 2022).</li> <li>• Unilever sent a list of questions to Astra on the circulated independent report and received a written response.</li> <li>• Unilever met with Astra to further response and actions forward (October 2022).</li> <li>• Unilever met with Friends of the Earth in November 2022 and March 2023.</li> </ul>

					<ul style="list-style-type: none"> <li>• Unilever met with Astra in December 2022 and March 2023.</li> <li>• Unilever takes the allegations very seriously and will continue to closely work with AAL, our suppliers, civil society, and relevant parties to further understand the issues and seek to assist and guide towards an independently mediated pathway.</li> <li>• Astra <a href="#">announced</a> the appointment of EcoNusantara as a third-party for the further review of their plantations (March 2023).</li> </ul>
B35	February 2022	Mighty Earth	<p><b>Rapid Response 38</b></p> <p>Allegation of noncompliant clearing at the PTD 1815 concession, for which AA Sawit Sdn Bhd is a project proponent. Full report <a href="#">here</a>.</p> <p>Mighty Earth published a report on other subsidiaries of AA Sawit in its <a href="#">Rapid Response 40</a>.</p>	Unilever has no direct sourcing with AA Sawit Sdn Bhd and its subsidiaries but may be exposed through our direct suppliers.	<ul style="list-style-type: none"> <li>• We requested our sustainability partners to verify the alerts and ownership attribution. Based on this verified information, we engaged relevant suppliers on the grievance.</li> <li>• Bunge has reached out to AA Sawit Sdn Bhd subsidiary Jernih Kemboja Sdn Bhd (JKSB) with its expectations on NDPE-compliant development, a Stop Work Order (SWO) on PTD 1815, and HCS/HCV assessments. Bunge has suspended trading with this supplier in the meantime. Refer to Bunge’s <a href="#">Grievance List</a>.</li> <li>• Mewah sourced indirectly from JKSB and had engaged with AA Sawit and JKSB on the allegations. Currently a trade suspension is imposed to facilitate investigation.</li> <li>• We will continue to monitor the case closely.</li> </ul>
B34	December 2021	Mighty Earth	<p><b>Rapid Response 37</b></p> <p>Allegation of noncompliant clearing at Dharma Satya Nusantara (DSN). Full report <a href="#">here</a>.</p>	Unilever has no direct sourcing with Dharma Satya Nusantara but may be exposed through our direct suppliers.	<ul style="list-style-type: none"> <li>• GAR has engaged DSN on the alleged noncompliance. DSN reported the clearance as carried out by the local community in areas that have not been released to PT Kencana Alam Permai (KAP) and it will work with the community to come to an agreement. Refer to <a href="#">GAR’s grievance list</a> (December 2021).</li> <li>• Wilmar has also engaged DSN on the issue. Field investigation found similarly that clearing was done by local communities on areas that have not been released. More information and DSN’s statement can be found on Wilmar’s <a href="#">Ineligible Grievance List</a>.</li> </ul>
B33	October 2021	Mighty Earth	<p><b>Rapid Response 36</b></p> <p>Allegation of noncompliant clearing by Innoprise Plantations Bhd. Full report <a href="#">here</a>.</p>	Unilever has no direct sourcing with Innoprise Plantations Bhd/ Yayasan Sabah but may be exposed through our direct suppliers.	<ul style="list-style-type: none"> <li>• We had been previously alerted to this clearing and had reached out to our suppliers (August 2021).</li> <li>• Our supplier KLK is indirectly linked to Innoprise and updated us on the results of its investigation with trading partners. It was concluded that the development is not related to oil palm but related to tree-planting. For more information please refer to KLK’s <a href="#">grievance list</a> and Wilmar’s <a href="#">ineligible grievance list</a>.</li> <li>• Our implemented sourcing agreement with our direct supplier does not currently include Yayasan Sabah, but it may still come into our supply chain through indirect exposure. We are monitoring the development with our sustainability partners.</li> </ul>

B32	October 2021	Tempo, Mongabay, Betahita, Auriga Nusantara	<p><b>Allegation of noncompliant sourcing from forest areas</b></p> <p>Tempo reached out to Unilever regarding their investigation on palm oil that is alleged to be sourced from inside Indonesian forests, and mills from producer groups that are linked to Unilever's supply chain.</p>	<p>Unilever has no direct sourcing with any of the reported suppliers: PT Tasma Puja, PT Ciliandra Perkasa/First Resources, and PT Sumbar Andalas Kencana/Incasi Raya, but may be exposed through our direct suppliers.</p>	<ul style="list-style-type: none"> <li>• Unilever engaged its supplier that indicated a potential link to the mills mentioned in the report.</li> <li>• <b>PT Sumbar Andalas Kencana:</b> PT Incasi Raya clarified that PT SAK only receives FFB from its nucleus and plasma, this includes crops from the truck with a plate number AA1891JH, and that the Bukit Betabuh area is located far away from PT SAK. It has provided a copy of the weighbridge data to our supplier.</li> <li>• <b>PT Tasma Puja:</b> Our supplier is indirectly linked and is investigating the case with its trading partner. PT TP informed our supplier that a survey to the farm is carried out as due diligence against each of their new FFB suppliers to ensure no sourcing from non-compliant sources. Our supplier is directly engaging the company on the allegations of conflict with plasma smallholders.</li> <li>• <b>PT Ciliandra Perkasa:</b> Our supplier is engaging the company on the allegations raised. The mill and its parent company are included in the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022). We maintain that the supplier would need to agree on and implement appropriate remediation plans before they can be included in supply to Unilever.</li> <li>• On the issue of overlapping areas with Forest Estates for all companies mentioned in the report, we received clarification that while the plantation companies have secured their location permits and HGU for their operations, the concessions overlap with areas designated as Forest Estates by the government in later years. The companies are therefore liable to administrative sanctions as stipulated in Article 110A of the UUCK (Undang-Undang Cipta Kerja) issued in 2020, and the government provided avenues in the Article 110A &amp; 110B of the UUCK and Government Regulation No 24 Year 2021 for these companies to solve their administrative issues of overlapping with Forest Estates during the 3-year grace period.</li> <li>• We will be monitoring the progress through our suppliers.</li> </ul>
B31	October 2021	Global Witness	<p><b>Allegation of NDPE noncompliance in Papua New Guinea</b></p> <p>Global Witness report titled "<a href="#">The true price of palm oil</a>" named several suppliers in an allegation of deforestation and human rights abuses in Papua New Guinea (PNG).</p>	<p>Unilever has no direct sourcing with any of the suppliers named in the report: Tzen Plantation/East New Britain Resources Group, Gilford Ltd./</p>	<ul style="list-style-type: none"> <li>• <b>East New Britain Resources Group (ENB):</b> Responding to allegations raised in the report, our supplier KLK has reached out to its trading partner that indicated a groupwide trade suspension has been imposed until the allegations have been fully investigated, and their last purchase from the group was in April 2020. Please refer to information on KLK's <a href="#">Grievance Redressal List</a> (October 2021).</li> </ul>

				<p>Rimbunan Hijau Group, and Bewani Oil Palm Plantations Ltd (BOPPL)/Top Leap Holdings but may be exposed through our direct suppliers.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• With regards to Unilever direct suppliers that were indicated to be linked to ENB in 2020, all no longer indicate such link to ENB in their supply to Unilever in 2021. Supplier Cargill has imposed a suspension, as reported on its <a href="#">grievance list</a> (March 2022).</li> <li>• <b>Rimbunan Hijau</b>: See also B15. In response to the allegations raised in the current report, Unilever's direct supplier that indicated a supply chain link with Rimbunan Hijau group has initiated engagement with their trading partners. Please refer to information on KLK's <a href="#">Grievance Redressal List</a> (October 2021).</li> <li>• Unilever supplier Mewah has also suspended purchases from both ENB and RH groups pending an investigation into the allegations. Refer to information on Mewah's <a href="#">Grievance Log</a> (August 2021).</li> <li>• <b>Bewani Oil Palm Plantations Ltd (BOPPL)</b>: On BOPPL and the alleged link to Prosper Group/Tee Family, see also B15, B18.</li> <li>• Unilever takes the allegations in the report very seriously and will continue to monitor the cases in close engagement with our suppliers and consultants.</li> </ul>
B30	August 2021	Teraju Foundation	<p><b>Allegation of labor rights violations</b></p> <p>Report sent to Unilever about alleged labor rights violations at PT MAR, subsidiary of PT Pasifik Agro Sejahtera, involving a worker, which includes issues of employment terms, non-payment of benefits and salary, unlawful termination, and FPIC to plasma.</p>	<p>Unilever has no direct sourcing relationship with PT PAS on a group level but may be exposed through our direct suppliers.</p>	<ul style="list-style-type: none"> <li>• Unilever has engaged relevant suppliers who are investigating the issue (August 2021) directly with the management of PT PAS.</li> <li>• Parties in the grievance were reported to have had a series of virtual meetings to discuss but have not yet reached a resolution.</li> <li>• Parties in the grievance informed our direct suppliers that they are in the process of appointing a mediator from the RSPO (August 2021).</li> </ul>
B29	June 2021	Rainforest Action Network (RAN)	<p><b>Allegation of noncompliant sourcing from the Leuser Ecosystem with links to Unilever supply chain</b></p> <p>An article on the RAN Leuser Watch blog alleges the transporting of FFB from PT Laot Bangko, a company with allegations of noncompliant clearing in the Leuser Ecosystem (see also: B19) to the mill PT Global Sawit Semesta (see also: B20), which was then sent to PT Sari Dumai, a refinery operated by Apical.</p>	<p>Unilever has no direct sourcing relationship with PT Laot Bangko or PT Global Sawit Semesta but may be exposed through our direct suppliers.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• Unilever acknowledged the grievance to RAN and contacted its supplier Apical on the allegations (July 2021).</li> <li>• Unilever met with Apical to inquire further on the case, reiterate its request to suspend PT LB and PT GSS, and understand further Apical's due diligence system in place for third-party suppliers that are in the vicinity of the Leuser Ecosystem. Apical shared to Unilever its action plan to strengthen traceability and deforestation monitoring mechanism in Aceh, the action plan of PT Laot Bangko, and updated Unilever on its engagement with PT GSS and PT LB. Apical has also ceased sourcing from both companies.</li> <li>• PT LB has reportedly committed to a moratorium, adopted an NDPE policy, and initiated the process to conduct an HCS-HCV assessment. Meanwhile, PT GSS has reportedly committed to an action plan with Apical to strengthen supply chain monitoring and</li> </ul>

					<p>traceability to ensure such violation will not be repeated. More information is available on Apical's <a href="#">grievance list</a> (July 2021).</p> <ul style="list-style-type: none"> <li>• We will continue to engage Apical to monitor the progress. In the meantime, we maintain our position on the companies as stated on our suspended supplier list until robust remediation and traceability action plans are in place for both PT LB and PT GSS.</li> </ul>
B28	June 2021	Mighty Earth	<p><b>Rapid Response 34</b></p> <p>Mighty Earth raised its Rapid Response (RR) report number <a href="#">34</a> (June 2021) alleging noncompliance to NDPE by palm oil producers.</p>	<p>Unilever has no direct relationship with suppliers listed: Eagle High, Triputra Agro, and Rimbunan Hijau, but may be exposed through our direct suppliers.</p>	<ul style="list-style-type: none"> <li>• <b>Eagle High:</b> Eagle High Plantation (EHP) conducted a site visit and <a href="#">reported</a> that clearing was not done by the plantation company, but by villagers who claimed they were not aware of the area belonging to PT TSP. EHP has provided clarification of their further engagement to Wilmar (refer to its <a href="#">ineligible grievance list</a>) who then deem grievance closed (July 2021).</li> <li>• <b>Triputra Agro:</b> Triputra Agro clarified in a <a href="#">report</a> to Unilever suppliers Wilmar and GAR that clearance took place outside of the concession (June 2021).</li> <li>• <b>Rimbunan Hijau:</b> RH reported to our direct supplier that the area is not planted with oil palm but is designated for forest replanting by the State Forestry and has been replanted with bamboo and Eucalyptus pellita in line with the State Forestry directives. Refer to Mewah's <a href="#">Grievance Log</a> (August 2021).</li> <li>• <b>PT Agincourt Resources:</b> PT Agincourt Resources is not a palm oil company and is not a supplier to Unilever. We have stated our concerns on the allegations to the company and encouraged to halt developments before HCS/HCV assessments have been completed and submitted for independent review.</li> </ul>
B27	June 2021	Forest People's Programme	<p><b>Allegation of ongoing violation of human rights</b></p> <p>A report compiled by TuK Indonesia, PUSAKA, Walhi, and Forest Peoples Programme contains allegations of unresolved human rights grievances at ten plantation companies linked to global brands.</p>	<p>Unilever has no direct relationship with PTPN XIII, Astra Agro Lestari, PT Mitra Austral Sejahtera, PT Kurnia Luwuk Sejati, and PT Hardaya Inti Plantation, but may be exposed through our direct suppliers.</p>	<ul style="list-style-type: none"> <li>• Unilever contacted Astra Agro Lestari (AAL) on the allegations related to Astra (PT ANA and PT SAL). Astra clarified to Unilever their perspective on the incidents/points raised in the allegation.</li> <li>• With regards to PT ANA, our supplier Wilmar has also been engaging AAL in response to grievances raised by WALHI (March 2021). Refer to Wilmar's <a href="#">grievance list</a>.</li> </ul>
B26	January 2021	Mighty Earth	<p><b>Rapid Response 32</b></p> <p>Mighty Earth raised its Rapid Response (RR) report number <a href="#">32</a> (January 2021) alleging noncompliance to NDPE by palm oil producers.</p>	<p>Unilever has no direct relationship with suppliers listed: SIPEF, Bunga Group, and YPJ Plantations Sdn Bhd,</p>	<p>Unilever ran a review on all cases raised in the Rapid Response reports, by comparing allegations with Unilever's internal deforestation alert and monitoring system with supply chain links to Unilever.</p>

				but may be exposed through our direct suppliers.	<p><b>YPJ Plantations Sdn Bhd:</b> Unilever engaged its suppliers and consultant on the case. Please find more detailed information on Wilmar’s <a href="#">grievance list</a>, Sime Darby’s <a href="#">grievance list</a>, and KLK <a href="#">grievance list</a> (May 2021).</p> <p><b>Bunga Group:</b> Unilever is not directly linked to Value Greenworld Sdn Bhd, but a mill owned by a Bunga subsidiary through several suppliers. Bunge reported that the Bunga group has committed to a moratorium and an NDPE policy (January 2021). Wilmar has ceased sourcing (March 2021). Other suppliers are monitoring the case through suppliers or directly (refer to the disclosure by <a href="#">Mewah</a>, <a href="#">Sime Darby</a>, and <a href="#">Bunge</a>).</p> <p><b>SIPEF</b> responded to allegations raised in Rapid Response 32 on <a href="#">its website</a>.</p>
B25	November 2020	Mighty Earth	<p><b>Rapid Response 30-31</b></p> <p>Mighty Earth raised its Rapid Response (RR) report number <a href="#">30</a> (August 2020) and <a href="#">31</a> (November 2020).</p>	<p>Unilever has no direct business relationship with Perbadanan Kemajuan Pertanian Negeri Pahang (PKPP), Perbadanan Pertanian Negeri Pahang (PKNP), Yayasan Pahang (YPPH), and Amanah Saham Pahang Bhd (ASPA), but may be exposed through our direct suppliers.</p>	<ul style="list-style-type: none"> <li>• Unilever ran a review on all cases raised in the Rapid Response reports, by comparing allegations with Unilever’s internal deforestation alert and monitoring system with supply chain links to Unilever. Unilever is engaging with Mighty Earth, its monitoring partners, and suppliers on these cases.</li> <li>• <b>PKPP Plantation Sdn Bhd:</b> Wilmar responded to Unilever that its supplier LKPP Corporation Sdn Bhd had clarified that it is a different entity from PKPP Plantation Sdn Bhd, and while Wilmar and LKPP does not source from PKPP, it had been engaging directly with PKPP on the allegations raised by Mighty Earth. PKPP has reportedly committed to a moratorium while investigation is ongoing and decided to reserve two lots of land for potential recovery sites (November 2020). Wilmar’s last purchase was in November 2020. Refer to Wilmar’s <a href="#">grievance list</a>.</li> <li>• Cargill and its trading partners had met with PKPP, which resulted in PKPP’s agreement to implement a group-wide policy and relevant programs from January 2021. Ongoing discussion on obtaining a written commitment to a recovery plan. More information on Cargill’s <a href="#">grievance list</a> (December 2020).</li> <li>• <b>PKNP:</b> We do not find an indication of supply chain link to Unilever or Unilever suppliers.</li> <li>• <b>Yayasan Pahang:</b> To our supplier Wilmar, and KLK (through its trading partner), YPPH clarified EIA was conducted and the development received approval from local authorities. YP Plantation has reportedly committed to 1) impose a moratorium effective August 2020, and 2) adoption of NDPE, which they have published <a href="#">online</a>. Refer to Wilmar’s <a href="#">grievance list</a> and KLK’s <a href="#">grievance list</a>.</li> </ul>

					<ul style="list-style-type: none"> <li>• <b>Amanah Saham Pahang:</b> Supplier KLK is investigating the matter and engaging ASPA on the allegation through its trading partner. ASPA has reportedly agreed to adopt an NDPE policy and issued a moratorium on new clearing. Refer to KLK’s <a href="#">grievance list</a>.</li> </ul>
B24	May 2020	Mighty Earth	<p><b>Rapid Response 27-29</b> Mighty Earth raised its Rapid Response (RR) report number <a href="#">27</a> (May 2020), <a href="#">28</a>, (June 2020), and <a href="#">29</a> (July 2020).</p> <p>Cases of indirect suppliers we reviewed to be in scope of our grievance process and will process further are:</p> <ul style="list-style-type: none"> <li>• Capitol Group (RR 29)</li> <li>• CB Industrial Product Holdings (detailed information presented in <a href="#">RR 26</a>)</li> </ul>	Unilever has no direct business relationship with Capitol Group, CB Industrial Product Holdings (CBIPH), but may be exposed through our direct suppliers.	<ul style="list-style-type: none"> <li>• Unilever ran a review on all cases raised in the Rapid Response reports, by comparing allegations with Unilever’s internal deforestation alert and monitoring system with supply chain links to Unilever. We excluded cases of which there was insufficient information in the report to be verified (e.g., lack of precise location of where the alleged deforestation case took place) and of palm oil companies that Unilever had already imposed a procurement suspension.</li> <li>• Update from our direct supplier Wilmar that PT Medco Papua Hijau Selaras (MPHS)/<b>Capitol Group</b> has committed to a moratorium (September 2020). PT MPHS has submitted HCV/HCS integrated report to be peer-reviewed by HCVRN (July 2021) and prepared management plans for the HCV/HCS areas. More information on Wilmar’s <a href="#">grievance list</a>.</li> <li>• Supplier Apical reported on its engagement with CBIPH. CBIPH claimed both companies in the Mighty Earth report are registered under Convertible Production Forest land licensing for timber logging by the Forestry Ministry (May 2020). More information on Apical’s <a href="#">grievance list</a>.</li> </ul>
B23	April 2020	Mighty Earth	<p><b>Allegation of NDPE noncompliance</b> In an article titled “<a href="#">Samling and Mulia Sawit’s Ongoing Deforestation</a>”, Mighty Earth alleges deforestation within the group’s Marudi &amp; Batu Belah concessions under Licences for Planted Forests (LPF) in Sarawak.</p> <p>A related article titled “<a href="#">The Coronavirus Climate Profiteers</a>” was published in April 2020.</p>	<p>Samling</p> <p>Unilever does not have direct business relationship with Samling or Glenealy Plantations.</p> <p>Please also refer to the <a href="#">Unilever’s Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• Unilever requested further information from Mighty Earth with regards to the grievances raised against Samling after which Unilever engaged several direct suppliers indicated to be linked to Samling to request more information on grievance verification and engagement with Samling. Due to the cross-commodity nature of the case, Unilever also requested support from external sustainability experts (April 2020).</li> <li>• Unilever checked with KLK about its alleged link to Mulia Sawit. KLK responded to Unilever that it does not purchase from MSA and MSA is not in its supply chain (April 2020).</li> <li>• Unilever issued a letter to its direct supplier requesting to impose a procurement suspension of Samling for Unilever’s palm oil supply chain including through indirect supply to Unilever (April 2020).</li> </ul>
B22	February 2020	Chain Reaction Research	<p><b>Allegation of top deforesters in 2019</b> In an article titled “<a href="#">The Chain: Repeat Offenders Continue to Clear Forests for Oil Palm in</a>”</p>	Unilever does not have any direct business relationship with the	<ul style="list-style-type: none"> <li>• Prior to the publication of the report, Unilever had reached out to its main direct suppliers with regards to companies listed due to deforestation alerts in 2019 and/or previous grievances.</li> </ul>



		<p><a href="#">Southeast Asia</a>,” Chain Reaction Research published their analysis on the ten palm oil companies that combined were responsible for approx. 39.500 hectares of deforestation and peat development in Indonesia, Malaysia, and Papua New Guinea in 2019.</p> <p>Some of these companies remain linked to the supply chain of companies and brands covered under Unilever’s NDPE sourcing policies:</p> <ul style="list-style-type: none"> <li>• <b>Jhonlin group:</b> Alleged clearing of 5,900 ha area of forest, mostly at PT Kodeco Timber in Kalimantan.</li> <li>• <b>Mulia Sawit group:</b> Alleged clearing of close to 4,300ha, mostly at PT PEAK in Central Kalimantan.</li> <li>• <b>Sungai Budi group/Tunas Baru Lampung:</b> Alleged clearing of 2,900ha of peat at PT SUJ in 2019. See also B18 and B15.</li> <li>• <b>Indonusa group:</b> Alleged clearing of 2,800ha of forest at PT Internusa Jaya Sejahtera in Merauke, Papua.</li> <li>• <b>Peputra group-related:</b> Alleged clearing of 2,100ha of peat and peat forest at PT Marita Makmur Jaya in Riau, one of three plantations CRR refers to as “shadow companies” owned by the same family.</li> <li>• <b>Musirawas group:</b> Alleged clearing of 2,100 ha in 2019 through PT Uni Primacom and PT Sumur Pandanwangi in Central Kalimantan.</li> </ul> <p>The remaining companies with little known supply chain information are:</p> <ul style="list-style-type: none"> <li>• <b>Sulaidy-associated company:</b> Alleged clearing of over 12,700 ha in 2019 in multiple plantations in Kalimantan.</li> <li>• <b>Rugao Shuangma group:</b> Alleged clearing of 2,460 ha of peat and peat forest in North Kalimantan in 2019.</li> <li>• <b>BEST Agro:</b> Alleged clearing of 2,300 ha in 2019. See also previous case B7.</li> </ul>	<p>ten companies mentioned but may be exposed through our direct suppliers.</p> <p>Please also refer to the <a href="#">Unilever’s Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>○ <b>Jhonlin group:</b> See B18.</li> <li>○ <b>Mulia Sawit group:</b> See B18.</li> <li>○ <b>Sungai Budi group:</b> See B15.</li> <li>○ <b>Indonusa group:</b> See B15.</li> <li>○ <b>Musirawas group:</b> See B16.</li> </ul> <ul style="list-style-type: none"> <li>• With regards to <b>BEST Agro</b>, see case B7.</li> <li>• In April 2020, Unilever sent a letter to its main direct suppliers to reiterate expectations that suppliers remove from Unilever’s supply chain companies that are alleged to be responsible for significant deforestation in 2019 and therefore may be failing to meet the requirements set out in of the Unilever Sustainable Palm Oil Policy. This includes the ten group companies raised in the CRR report.</li> <li>• Unilever’s main suppliers confirm they have taken actions to exclude the following groups from supply to Unilever: Sulaidy, Jhonlin group, Mulia Sawit group, Tunas Baru Lampung, Indonusa, Shuangma group, Best Agro, Musirawas, Golden Land Bhd. Unilever will continue to monitor remaining supply chain links to groups indicated to be indirectly linked to Unilever.</li> <li>• <b>Peputra group-related:</b> With regards to PT Marita Makmur Jaya (PT MMJ), suppliers raised questions regarding the Peputra group and the link of PT MMJ to the group (e.g. see GAR’s <a href="#">statement</a> on this issue). Unilever is reviewing group definitions used to assess the case, including that of the RSPO, to determine the extent to which Peputra group shall be included in the engagement with PT MMJ on the allegations and seeks constructive ways to address the ongoing clearing at PT MMJ. In the meantime, suppliers should ensure supply from PT MMJ does not get into Unilever’s supply chain.</li> <li>• With regards to an <a href="#">update</a> in 2020 that alleged a link between Sulaidy-owned plantation with a Pundi Group mill, Unilever reached out to its direct supplier Wilmar who reported that the mill has stopped sourcing from PT PAL effective September 1<sup>st</sup> 2020, and has shared list of FFB suppliers to Wilmar for monitoring. More detailed information on Wilmar’s <a href="#">grievance list</a> (September 2020).</li> </ul>
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B21	November 2019	Greenpeace	<p><b>Allegations of noncompliance with regards to forest fires</b></p> <p>Greenpeace published a report titled “<a href="#">Burning down the house</a>” with allegations that Unilever is purchasing palm oil from producers linked to forest fires and operations subject to court action, administrative sanctions, or other government intervention as a result of fires in the past few years.</p> <p>A related <a href="#">press release</a> on transboundary haze was also published in November 2019.</p>	<p>Unilever is allegedly linked to the following suppliers:</p> <p>Agro Inti Semesta, Astra Agro Lestari, ANJ, Bakrie, Bumitama, Citra Borneo Indah, Fangiono Agro, Gagah Putra Satria, GAMA, Genting, JA Wattie, Korindo, Matahari Kahuripan (Makin), NPC Resources, Pasifik Agro Sentosa, Rachmat, Rajawali/Eagle High, Salim, SIPEF, Sungai Budi/Tunas Baru Lampung, Tianjin Julong, TSH Resources, Waimusi Agroindah, Arjuna Utama Sawit, Provident Agro, Teguhkarya Wanalestari, Djarum/HPI Agro, Nusantara Sawit Persada, Surya Bratasena Plantation.</p> <p>Unilever has no direct sourcing relationship with the suppliers above but may be exposed through our direct suppliers.</p>	<ul style="list-style-type: none"> <li>• Prior to the report publication on November 4, Greenpeace sent Unilever a letter detailing a new publication on October 30 (2019).</li> <li>• Unilever reached out to its direct suppliers to verify the allegations: Apical, Bunge, Cargill, KLK, Musim Mas, PTPN, Sime Darby, GAR, and Wilmar, requesting clarification on fires and hotspots in the suppliers’ direct operations, sealed operations or fines, links to third-party suppliers linked to forest fires in 2015-2018, and burnt areas in 2019 detected by Unilever’s monitoring system, if any (November 2019).</li> <li>• Unilever direct suppliers clarified which third party suppliers listed are present in their supply chain and are engaging those they are sourcing from to investigate the allegations. Unilever is monitoring the progress.</li> <li>• Some suppliers were subject to previous cases and engagements: <ul style="list-style-type: none"> <li>○ <b>ANJ:</b> See B4.</li> <li>○ <b>Bumitama:</b> See B15.</li> <li>○ <b>Citra Borneo Indah:</b> See B2.</li> <li>○ <b>Fangiono Agro:</b> See B10.</li> <li>○ <b>GAMA:</b> See B15.</li> <li>○ <b>Genting:</b> See B15.</li> <li>○ <b>JA Wattie:</b> See B16.</li> <li>○ <b>Korindo:</b> See B15.</li> <li>○ <b>NPC Resources:</b> See B15.</li> <li>○ <b>Salim:</b> See B3.</li> <li>○ <b>Sungai Budi/Tunas Baru Lampung:</b> See B15.</li> <li>○ <b>Djarum/HPI Agro:</b> B15.</li> </ul> </li> <li>• Unilever direct suppliers have stopped sourcing from some of the suppliers listed: ANJ, Citra Borneo Indah, JA Wattie, Salim, Sungai Budi. Unilever and its suppliers are looking into the mills Greenpeace reported as associated with these groups.</li> <li>• Unilever takes this issue seriously and will continue to engage with its suppliers to resolve any noncompliance with regards to fires.</li> <li>• Unilever’s work with Earth Equalizer and Aidenvironment allows us to investigate peat and forest burnt areas via satellite images. We are also involved in other monitoring initiatives and recently invested into supporting earlier detection of deforestation using radar waves which will be made available through <a href="#">WRI’s Global</a></li> </ul>

					<a href="#">Forest Watch</a> platform. Finally, we are engaging with the RSPO on cases related to RSPO members.
B20	Sept 2019	Rainforest Action Network (RAN)	<p><b>Allegation of noncompliant sourcing from the Rawa Singkil Wildlife Reserve with links to Unilever supply chain</b></p> <p>A <a href="#">report</a> published by RAN alleges the transporting of FFB from inside Rawa Singkil Wildlife Reserve to a nearby palm broker, which were then sent to two mills supplying refineries of Unilever suppliers.</p>	<p>Unilever has no direct sourcing relationship with PT Global Sawit Semesta (GSS) and PT Samudera Sawit Nusantara (SSN) but may be exposed to the companies through direct suppliers.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• RAN notified Unilever of the upcoming release of the results of their investigations (September 2019).</li> <li>• Unilever responded to the notification.</li> <li>• Unilever immediately contacted its suppliers with indication of direct sourcing from around the Rawa Singkil area.</li> <li>• Unilever suppliers GAR and Musim Mas are both investigating the case with PT GSS and PT SSN (October 2019) and have published an official response on their respective websites (<a href="#">here</a> and <a href="#">here</a>).</li> <li>• Our suppliers' site visits with both mills are scheduled in October 2019.</li> <li>• Unilever had requested its suppliers GAR and Musim Mas to exclude any palm oil products coming from PT GSS and PT SSN from its direct contract with them, and to ensure the mills have a verifiable traceability system and a mechanism to monitor NDPE compliance before GAR and Musim Mas resume linking supply from these mills to Unilever (October 2019).</li> </ul>
B19	May 2019	Rainforest Action Network (RAN)	<p><b>Deforestation in Leuser Ecosystem (Aceh) Allegation</b></p> <p>In May 2019, Rainforest Action Network formally submitted grievances on twelve companies with allegations of noncompliance as documented on multiple reports and articles on LeuserWatch.org.</p> <p>These companies are:</p> <ul style="list-style-type: none"> <li>• <a href="#">PT Nia Yulided</a></li> <li>• <a href="#">PT Putra Kurnia</a></li> <li>• <a href="#">PT Tualang Raya</a></li> <li>• <a href="#">PT Indo Alam</a></li> <li>• <a href="#">PT Tegas Nusantara</a></li> <li>• <a href="#">PT Indo Sawit Perkasa</a></li> <li>• <a href="#">PT Perkebunan Nusantara (PTPN) I Blang Tualang</a></li> <li>• <a href="#">PT Agra Bumi Niaga</a></li> <li>• <a href="#">PT Surya Panen Subur II (See also: B6)</a></li> <li>• <a href="#">PT Kallista Alam</a></li> <li>• <a href="#">PT Dua Perkasa Lestari</a></li> <li>• <a href="#">PT Laot Bangko</a></li> </ul>	<p>Unilever has no direct sourcing relationship with any of the companies listed.</p> <p>PT Perkebunan Nusantara I (PTPN I), PT Laot Bangko, PT Teupin Lada, and PT Beurata Subur Persada are either third-party/indirect suppliers that may enter Unilever's supply chain through trade, or belong to the same group company as an indirect supplier to Unilever.</p>	<ul style="list-style-type: none"> <li>• Unilever has notified its direct suppliers with potential sourcing links to the area.</li> <li>• Unilever also works with Aidenvironment to verify the allegations through the deforestation monitoring platform and deployment of field teams.</li> <li>• GAR responded to Unilever with information that eleven of the companies identified in the May 2019 grievance are not linked to their supply chain, and they are engaging directly with one supplier on the allegation (May 2019). GAR has previously reported on their engagement progress with <a href="#">PT Indo Sawit Perkasa</a>, <a href="#">PT Agra Bumi Niaga</a>, <a href="#">PT Dua Perkasa Lestari</a>, and <a href="#">PT Laot Bangko</a>.</li> <li>• Musim Mas has responded that it does not source FFB directly from any of the suppliers listed and is currently investigating whether these companies are linked to its supply chain.</li> <li>• Cargill notified Unilever that in agreement with Cargill's grievance management expectations, its supplier has ceased sourcing from the PT Laot Bangko's group-level company (September 2019).</li> <li>• Bunge notified Unilever that clearing had been verified by their supplier, and criteria have been set before PT Laot Bangko and its group-level company can gain supply chain re-entry. More information on Bunge's grievance <a href="#">list</a> (September 2019).</li> </ul>

			<p>In August 2020, RAN published:</p> <ul style="list-style-type: none"> <li>• <a href="#">Article</a> alleging FFB from PT Indo Alam is sent to the mill PT Teupin Lada.</li> <li>• <a href="#">Article</a> alleging ongoing social conflict, irregular permitting procedure, and development on peat at PT Dua Perkasa Lestari, and that FFB from the plantation is being sent to mill PT Beurata Subur Persada.</li> </ul>		<ul style="list-style-type: none"> <li>• Unilever partnering with Musim Mas and Pepsico are collaborating to support the Verified Sourcing Area (VSA) program in Aceh, developed by the IDH Sustainable Trade Initiative, to increase sustainable palm oil production while protecting the Leuser Ecosystem. This was initiated by the <a href="#">signing of the Production, Protection, and Inclusion (PPI) Compact</a> by the government of Aceh Tamiang District with multiple local stakeholders (December 2019).</li> <li>• With regards to the new allegations raised in 2020, Unilever immediately reached out to suppliers with links to the third-party mills to verify the allegations.</li> <li>• Supplier GAR reported on their engagement with PT Teupin Lada, citing PT TL committed to exclude PT Indo Alam from its supply chain effective in August 2020, and engaging PT TL to reach 100%TTP by Q4 2020. More information on GAR's <a href="#">grievance list</a>.</li> <li>• Wilmar has engaged PT Teupin Lada after detecting the issue through its Leuser Supplier Reporting Tool (LSRT) programme and confirmed that the mill has ceased sourcing from PT Indo Alam. See Wilmar's <a href="#">grievance list</a>.</li> </ul>
B18	Feb 2019	Chain Reaction Research	<p><b>List of alleged top ten deforesters in Southeast Asia</b></p> <p>Chain Reaction Research listed allegations of <a href="#">top ten deforesters in 2018</a> based on alleged hectares deforested, and how it alleges that NDPE policy uptake has influenced the year-on-year decline. On the list are several companies that are stated to remain connected to buyers with NDPE policies.</p> <ul style="list-style-type: none"> <li>• <b>Jhonlin group:</b> Alleged clearing of around 5,000ha of forest on PT Multi Sarana Agro Mandiri, PT Pradiksi Gunatama and PT Kodeco Timber plantations in Kalimantan. Two companies are stated to belonging to the group, PT Adisurya Cipta Lestari and PT Batulicin Agro Sentosa, sell palm oil to traders with NDPE policies.</li> <li>• <b>Tanah Merah project:</b> See B12.</li> <li>• <b>Ciliandry Anky Abadi (CAA):</b> Alleged clearing of around 3,500ha of mostly peat forest in 2018. See also B10.</li> </ul>	<p>Unilever does not have any direct business relationship with Jhonlin group, Tanah Merah project, CAA, BLD plantations, Tee family/Prosper group, Mulia Sawit Agro, Sungai Budi Group/Tunas Baru Lampung, Citra Borneo Indah/PT SSMS, and ANJ.</p> <p>However, these are third-party/indirect suppliers that may enter Unilever's supply chain through trade.</p> <p>Please also refer to the <a href="#">Unilever's Suspended</a></p>	<p>Upon publication of this article, Unilever investigated our supply chain for the existence of any links with the suppliers listed.</p> <ul style="list-style-type: none"> <li>• <b>Jhonlin group:</b> Unilever reached out to its suppliers with links to the Jhonlin group to request confirmation on the allegations (February 2019). Unilever's direct suppliers with links to this group responded that they are investigating into the allegations, with one indicating they are no longer sourcing from the group. Bunge's latest mill list (Q2 2019) indicated they no longer source from Batulicin Agro. We reiterated our request that suppliers exclude Jhonlin from supply to Unilever in April 2020.</li> <li>• <b>Tanah Merah project:</b> See B12.</li> <li>• <b>CAA:</b> See B10.</li> <li>• <b>BLD:</b> Unilever reached out to two suppliers with supply chain links to BLD. Both suppliers have indicated they no longer source from the company in 2018. Refer to Bunge's <a href="#">grievance list</a> and Cargill's <a href="#">grievance list</a> (February 2019).</li> <li>• <b>Tee family/Prosper:</b> See B15.</li> <li>• <b>Mulia Sawit Agro:</b> Unilever reached out to its suppliers who have indicated they no longer buy from Mulia Sawit Agro. Refer to Bunge's <a href="#">grievance list</a>, <a href="#">Cargill's grievance list</a> and Apical's <a href="#">grievance</a></li> </ul>

			<ul style="list-style-type: none"> <li>• <b>BLD Plantations:</b> Alleged development of approximately 3,000ha of peat in Mukah, Sarawak.</li> <li>• <b>Tee family:</b> Tee family members were reported to own the Bewani Oil Palm Plantation (BOPPL) in Papua New Guinea, where 3,000ha of forest was allegedly cleared in 2018. See also B15.</li> <li>• <b>Mulia Sawit Agro:</b> Alleged clearing of peat and peat forest on PT Persada Era Agro Kencana plantation in Central Kalimantan.</li> <li>• <b>Sungai Budi group:</b> Alleged clearing of around 2,600ha of peat and peat forest in 2018. See also B15.</li> <li>• <b>Citra Borneo Indah:</b> Alleged clearing of around 2,300ha of forest and peat in 2018. See also B2.</li> <li>• <b>Austindo Nusantara Jaya (ANJ):</b> Alleged clearing of around 2,100ha of forest in 2018. See also B4.</li> </ul>	<a href="#">or No-Buy List of Palm Oil Companies</a> (August 2022).	<p><a href="#">update</a> (June 2019). We reiterated our request that suppliers exclude Mulia Sawit from supply to Unilever in April 2020.</p> <ul style="list-style-type: none"> <li>• <b>Sungai Budi group:</b> See B15.</li> <li>• <b>Citra Borneo Indah:</b> See B2.</li> <li>• <b>ANJ:</b> Unilever has engaged suppliers that previously indicated ANJ mills is in their supply chain, all of which have adopted a “no buy” position on ANJ. See B4.</li> </ul>
B17	Feb 2019	Foresthints.com	<p><b>NDPE non-compliance allegations</b></p> <ul style="list-style-type: none"> <li>• Foresthints released <a href="#">an article</a> alleging Pundi Lahan Khatulistiwa group of continually clearing and draining peat forests at PT Pinang Witmas Abadi (PWA) in West Kalimantan.</li> </ul>	<p>Pundi Lahan Khatulistiwa group</p> <p>Unilever does not have direct business relationship with the Pundi group.</p>	<ul style="list-style-type: none"> <li>• In February 2019, Unilever contacted direct suppliers with links to the Pundi group immediately after receiving the Foresthints article.</li> <li>• Cargill responded to Unilever that Pundi was an indirect supplier, and Cargill no longer sources from Pundi. More information on Cargill’s indirect supplier <a href="#">grievance list</a>.</li> <li>• Bunge responded that it has ceased sourcing from Pundi and notified their supplier, as is also reflected on the <a href="#">Bunge grievance list</a> (last update April 2019).</li> <li>• Sime Darby <a href="#">clarified on their website</a> that Pundi group does not supply to Sime Darby.</li> </ul>
B16	Sept 2018	Mighty Earth	<p><b>Alleged NDPE non-compliant companies with links to Unilever supply chain</b></p> <p>Mighty Earth with its partners Aidenvironment and MapHubs publishes 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</p>	<p>Unilever does not have any direct business relationship with ANJ Group, Tabung Haji, HSA group, JA Wattie, Musirawas, and Samuel.</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> </ul>

			<p>alignment with Unilever’s Sustainable Palm Oil Policy.</p> <ul style="list-style-type: none"> <li>• <b>ANJ:</b> see B4.</li> <li>• <b>Tabung Haji:</b> see B15.</li> <li>• <b>HSA Group:</b> see B13.</li> <li>• <b>JA Wattie:</b> PT Condong Garut, reported to be managed by JA Wattie, allegedly cleared 52ha peat forest in West Kalimantan. Information in <a href="#">Rapid Response 6</a>.</li> <li>• <b>Musirawas:</b> PT Sumur Pandanwangi allegedly developed 243ha of peat in the concession. Information in <a href="#">Rapid Response 6</a>.</li> <li>• <b>Samuel:</b> 45ha of forest were cleared in PT Prasetya Mitra Muda (PMM) Blok II concession. In <a href="#">Rapid Response 6</a>, 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.”</li> </ul>	<p>However, these are third-party/indirect suppliers that may enter Unilever’s supply chain through trade, as identified by Mighty Earth.</p> <p>Mighty Earth reported potential indirect supply from the named companies through Unilever’s suppliers that include:          KLK, Wilmar, GAR, Musim Mas, Cargill, IOI/Bunge, ADM, Louis Dreyfus, and Sime Darby.</p>	<p>previously declared they source for ANJ indicated they no longer source from ANJ.</p> <ul style="list-style-type: none"> <li>• <b>JA Wattie:</b> Unilever’s direct supplier Bunge has stopped sourcing from the supplier in February 2018.</li> <li>• <b>Musirawas:</b> Unilever was previously linked through 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. Apical has also engaged Musirawas, also commonly known as the Asam Jawa Group to request further clarification. PT Asam Jawa reiterated they have no management control of PT SP. More information available on Wilmar’s <a href="#">Grievance List</a> and Apical’s <a href="#">grievance list</a>. We reiterated our request that suppliers exclude Musirawas from supply to Unilever in April 2020.</li> <li>• <b>Samuel:</b> Wilmar has been engaging directly with Samuel. Samuel has signed a letter of commitment to Wilmar’s NDPE policy and 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 <a href="#">Grievance List</a> (August 2018).          GAR does not source from PT PMM, but from another supplier confirmed to be under the same controlling shareholder. In December 2018 GAR conducted a site visit with TFT. PT PMM has met with GAR and discussed allegations of clearing done by a third party as well as HCS/HCV that PMM committed to at a group level. <a href="#">Report</a> of the site visit can be accessed on GAR’s website (January 2019).</li> <li>• 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.</li> </ul>
B15	May 2018	Greenpeace	<p><b>NDPE non-compliance allegations</b></p> <ul style="list-style-type: none"> <li>• In a letter to major palm oil buyers, Greenpeace listed 26 alleged NDPE non-compliant palm oil producer groups (May 2018).</li> <li>• Greenpeace published “<a href="#">Final Countdown</a>,” a report on the 26 companies and on brands and traders’ alleged failure to implement</li> </ul>	<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,</p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

			<p>NDPE commitments that extend to their entire supply chains (September 2018).</p> <ul style="list-style-type: none"> <li>• <b>AEP:</b> see B11.</li> <li>• <b>ANJ:</b> see B4.</li> <li>• <b>Bumitama:</b> Greenpeace <a href="#">report</a> 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).</li> <li>• <b>CCM:</b> Deforestation allegations that between November 2016 and October 2017 PT HIP cleared 500 ha of secondary forest.</li> <li>• <b>Citra Borneo Indah/PT SSMS:</b> See B2.</li> <li>• <b>Djarum:</b> Between August 2015 and September 2017, allegations that PT GSK cleared 1,100 ha of peatland forest.</li> <li>• <b>DTK:</b> 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 2017, allegations that the company continued clearing.</li> <li>• <b>GAMA/Ganda:</b> 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 recently constructed a new palm oil mill in West Kalimantan (reported in March 2018). See also A8.</li> <li>• <b>Genting:</b> 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.</li> <li>• <b>Hayel Saeed Anam (HSA) group:</b> See B12.</li> </ul>	<p>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"> <li>• <b>AEP:</b> See B11.</li> <li>• <b>ANJ:</b> See B4.</li> <li>• <b>Bumitama</b> had published a <a href="#">sustainability report in 2016</a>, 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 <a href="#">Final Countdown</a> 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 href="#">a report</a> 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' <a href="#">grievance list</a>. Cargill will request for Bumitama's action plan on compensation from its direct suppliers. In April 2019, Bumitama issued <a href="#">a response</a> to allegations of clearing at PT LGI raised by its internal and external sources.</li> <li>• <b>CCM:</b> 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 available on Musim Mas' <a href="#">grievance list</a>. Cargill reported that a moratorium is in place for Hardaya Plantation and there is active monitoring of the moratorium via Aidenvironment. CCM is not in Cargill's and Bunge's direct supply chain. There is no additional development since the moratorium is in place.</li> <li>• <b>Citra Borneo Indah/PT SSMS:</b> See B2.</li> <li>• <b>Djarum:</b> 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 <a href="#">GAR grievance list</a>. 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 <a href="#">Indirect Suppliers Grievance List</a>.</li> </ul>
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			<p>clearing in Papua New Guinea and deforestation of 1,016ha within concession.</p> <ul style="list-style-type: none"> <li>• <b>Sungai Budi Group (Tunas Baru Lampung):</b> Between August 2015 and October 2017, allegations that PT SUJ cleared 4,100ha of forest, mostly on peat. Also, allegations that between April 2016 and August 2017, PT SJP cleared 1,400ha of peatland forest, including 700 ha after December 2016.</li> <li>• <b>Tabung Haji Plantations:</b> See B14.</li> <li>• <b>Tee Family/Prosper:</b> Alleged deforestation in Papua New Guinea (PNG) by Bewani Oil Palm Plantations (BOPPL) with alleged ownership ties to the Prosper Group of Companies/ Far East Holdings Bhd (1,146ha of alleged deforestation since July 2017).</li> </ul>		<p>KLK engaged with Genting to clarify the allegations, information available on KLK’s <a href="#">Grievance list</a>. For alleged clearance by Genting subsidiary PT CSC detected in 2019, please refer to Wilmar’s <a href="#">grievance list</a>.</p> <ul style="list-style-type: none"> <li>• <b>Hayel Saeed Anam (HSA) group:</b> See B12.</li> <li>• <b>IJM Corporation:</b> 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 <a href="#">Grievance List</a>. Our supplier Cargill is engaging with their direct supplier, as noted on Cargill’s <a href="#">Indirect Grievance List</a>. Bunge reported confirmed clearance stop and moratorium in place. Source: Bunge <a href="#">Grievance List</a> (February 2019).</li> <li>• <b>Indonusa:</b> Unilever supplier Cargill stated that Indonusa is no longer in their supply chain. More information available on Cargill’s <a href="#">Grievance List</a>. We reiterated our request that suppliers exclude Indonusa from supply to Unilever in April 2020.</li> <li>• <b>Korindo:</b> Korindo is reportedly committed to implementing moratorium in three concessions – Tunas Sawaerma A, Tunas Sawaerma B and Tunas Sawaerma (2016). Wilmar has put on hold purchasing from Korindo in June 2016. Information on Wilmar’s <a href="#">Grievance List</a>. Our supplier Cargill reported that they have reached out to their suppliers, two of which indicated they are no longer sourcing from Korindo, and one that has implemented a strict controlled-purchase mechanism with the supplier. Cargill is monitoring this engagement. More information available on Cargill’s <a href="#">grievance list</a>. Korindo is not in Unilever’s direct or indirect supply chain per June 2018.</li> <li>• <b>Noble group:</b> See B8.</li> <li>• <b>NPC Resources:</b> Our direct supplier, Wilmar, has been engaging with NPC on the allegations of NDPE non-compliance following their internal monitoring. NPC has reportedly appointed consultants to conduct relevant assessment at PT SAS. The consultants are completing the report and has shared the draft report with Wilmar in August 2018. Wilmar continues to monitor PT SAS’s activities on a monthly basis. More information on Wilmar’s <a href="#">Grievance List</a>.</li> <li>• <b>Rimbunan Hijau:</b> Our direct supplier, Wilmar, has initiated engagement with Rimbunan Hijau since early September 2018 to</li> </ul>
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					<p>seek clarifications on allegations of deforestation at their Papua New Guinea site. Wilmar does not source from Gilford Ltd, but their parent company, Rimbunan Hijau is associated with Wilmar's suppliers in Malaysia. Gilford Ltd has reportedly provided a written commitment in adhering to an NDPE policy and shared their concession maps with RH group for further investigation. A stop work order is reportedly in place while engagement is ongoing. More information on Wilmar's <a href="#">Grievance List</a>.</p> <ul style="list-style-type: none"> <li>• <b>Salim group:</b> see B3.</li> <li>• <b>Samling/Glenealy Plantations:</b> Wilmar engaged with Samling on the Myanmar case in early 2017. A stop work order is in place since February 2017 and Samling has engaged an assessor to ensure NDPE compliance. Wilmar has initiated discussion with Samling on their operation in Indonesia, Malaysia, and Papua New Guinea (PNG) since August 2017. Samling was in the process of divesting their PNG concession in 2017, and the divestment process was completed in early 2018. Samling has committed to a moratorium on land clearing activities in their Malaysia and Indonesia operation. All the relevant assessments must be conducted prior resuming their land clearing for palm planting in the future. Wilmar met with Samling in January 2018 and conducted a site visit in Sarawak in March 2018. More information on Wilmar's <a href="#">Grievance List</a>. Bunge has stopped sourcing from Samling in June 2018, as indicated in their <a href="#">Grievance List</a>. With regards to alleged clearing in December 2018 in Samling-Lana plantations, Samling clarified the areas highlighted was harvesting of acacia trees planted within the Samling Group's Licensed Planted Forest (LPF) concession and not oil palm. Source: <a href="#">KLK</a> (December 2018).</li> <li>• In April 2020, Unilever engaged its suppliers with regards to recent land clearing allegations by Samling and requested our direct suppliers to suspend supplies into Unilever's supply chain deriving from Samling.</li> <li>• <b>Sungai Budi Group/Tunas Baru Lampung:</b> Our direct supplier GAR had engaged with PT TBL, conducted an analysis on PT SUJ and provided recommendations with regards to conducting a soil study and plan for peat restoration. However, GAR's internal monitoring still detected land clearing in both concessions in 2017 and PT SUJ in July 2018. Our direct supplier Wilmar has engaged with PT TBL following their monitoring activity in 2016 and has secured PT TBL's commitment to adhere to an NDPE policy and halt further land clearing. Despite this commitment, Wilmar's</li> </ul>
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					<p>internal monitoring detected ongoing land clearing activities. Wilmar’s last purchase from TBL was on February 2018, as listed in their <a href="#">Grievance List</a>. Musim Mas’ last purchase was in June 2018 as indicated <a href="#">on their Grievance List</a>. See also GAR <a href="#">Grievance List</a>. Unilever reached out to suppliers with regards to allegations arising in 2019 against this supplier. Cargill declared TBL to be no longer in their supply chain. Source: Cargill’s <a href="#">grievances</a>. We reiterated our request that suppliers exclude Sungai Budi group from supply to Unilever in April 2020.</p> <ul style="list-style-type: none"> <li>• <b>Tabung Haji Plantations:</b> See B14.</li> <li>• <b>Tee Family/Prosper:</b> One of our direct suppliers met with Prosper to seek clarification in May 2018. Our suppliers <a href="#">Mewah</a> and <a href="#">Bunge</a> were no longer sourcing from Prosper in H2 2018, but Mewah continues to engage with Prosper and requested action plan implementation in January 2019. Our supplier, Cargill, has on several occasions raised the concern of alleged association of Prosper to Bewani Oil Palms in PNG. Prosper denies any form of association, stating that Bewani is an investment by its minority shareholder with no commercial links to the Group. Cargill have received written acknowledgment that Prosper is not commercially linked to Bewani and Prosper will not market any of Bewani's products. KLK engaged with Prosper in September 2018, and received feedback that neither Prosper Palm Oil Products Marketing Sdn Bhd nor Winner Acres Sdn Bhd has signed any agreement with the people of Bewani. Source: KLK’s <a href="#">Grievance List</a>.</li> </ul>
B14	April 2018	Chain Reaction Research, Greenpeace, Mighty Earth	<p><b>Clearance of peatland and forests allegation</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Chain Reaction Research</a> 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).</li> <li>• 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 “<a href="#">Final Countdown</a>” (Sept 2018).</li> </ul>	<p>Tabung Haji Plantations (THP)</p> <p>Unilever does not have any direct business relationship with Tabung Haji Plantations.</p> <p>Please also refer to the <a href="#">Unilever’s Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• September 24, 2018, Unilever issued a <a href="#">public response</a> to the Greenpeace campaign “Final Countdown”.</li> <li>• 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.</li> <li>• Wilmar reported in its <a href="#">Grievance List</a> 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.</li> <li>• 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</li> </ul>

			<ul style="list-style-type: none"> <li>In a letter to Unilever, Mighty Earth raised a grievance in <a href="#">Rapid Response 5</a> alleging THP of further deforestation of 217ha peat forests at PKP between April and June 2018.</li> <li>In April 2020, <a href="#">Chain Reaction Research</a> published allegations of the planned development of 8,094ha of oil palm plantations on Deru Semangat Sdn Bhd (DSSB), in Mukim Tembeling, Pahang, Malaysia before High Carbon Stock (HCS) assessment were conducted.</li> </ul>		<p>there is indeed land clearing. We continue to monitor this progress directly with Wilmar and through their public grievance update.</p> <ul style="list-style-type: none"> <li>Musim Mas (<a href="#">grievance list</a>) and GAR (<a href="#">grievance list</a>) are also Unilever direct suppliers that have been engaging with THP and through which we will continue to monitor this situation.</li> <li>Following indication of peat clearance at PT PKP captured by GAR's internal monitoring, GAR reached out to Trurich Resources (a JV between TH plantations and FGV). Given the feedback they received with regards to the grievance, GAR has deemed Trurich Resources as non-compliant with their grievance handling process. More information on GAR's <a href="#">grievance list</a> (March 2019).</li> <li>Unilever reached out to our direct suppliers with regards to new indications of peat clearing at PT PKP in 2019.</li> <li>In 2020, stakeholders raised the Chain Reaction Research article alleging the planned development before HCS in DSSB, Pahang, Malaysia. Unilever immediately reached out to its deforestation monitoring partner and direct suppliers who have direct engagements with THP to better understand the allegations. We learned from our suppliers that TH Plantations has communicated the intention to terminate the Management Agreement to DSSB. Refer to Musim Mas' <a href="#">website</a> (June 2020).</li> <li>Unilever issued a letter to its direct supplier requesting to impose a procurement suspension of TH Plantations at a group level for Unilever's palm oil supply chain including through indirect supply to Unilever (August 2020).</li> </ul>
B13	February 2018	Foresthints.com	<p><b>Deforestation allegation</b></p> <p><a href="#">Foresthints.com</a> 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"> <li>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).</li> <li>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 (December 2018).</li> </ul>
B12	December 2017	Greenpeace, Mighty Earth	<p><b>Clearance of protected forest allegation</b></p> <ul style="list-style-type: none"> <li>Greenpeace Deforestation Case Studies allege ownership linkages between the Hayel Saeed Anam (HSA) Group, Pacific Inter-Link,</li> </ul>	<p>Hayel Saeed Anam (HSA) Group</p>	<ul style="list-style-type: none"> <li>Unilever engaged Greenpeace regarding the findings of the Deforestation Case Study report and inquired about the HSA Group case (December 2017).</li> </ul>

			<p>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).</p> <ul style="list-style-type: none"> <li>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 "<a href="#">Final Countdown</a>" (Sept 2018).</li> <li>In a September 2018 letter to Unilever, Mighty Earth raised a grievance in <a href="#">Rapid Response 5</a> and <a href="#">Rapid Response 7</a> 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.</li> <li>The allegations, alleged ownership link to the HSA group, and the group's response to the allegations are raised again in <a href="#">an article</a> by the Gecko Project in November 2018.</li> <li>Greenpeace and EIA raised a complaint to the RSPO against Pacific Inter-Link Sdn Bhd, Pacific Oils &amp; Fats Industries Sdn Bhd, PT. Pacific Indopalm Industries, PT. Pacific Medan Industri, and PT. Pacific Palmindo Industri (HSA group companies). The case was accepted in November 2018 and can be found <a href="#">here</a>.</li> </ul>	<p>Unilever does not have any direct business relationship with Pacific Inter-Link and Arma Foods.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>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).</li> <li>In January 2018, Unilever stopped buying from Pacific Inter-Link and Arma Foods (associated with the HSA group).</li> <li>Unilever issued a statement regarding Unilever's position on the HSA Group allegations (May 2018).</li> <li>HSA issued <a href="#">a statement</a> 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).</li> <li>PIL group issued a sustainability charter in July 2018 and launched a sustainability dashboard in Q3 2018. More information is available on their <a href="#">website</a>.</li> <li>Unilever issued a public response to the Greenpeace campaign "Final Countdown" that included our position on the HSA case (September 2018).</li> <li>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).</li> <li>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.</li> <li>In February 2019, PIL issued a <a href="#">clarification letter</a> to the RSPO complaints panel, with additional details on the circumstances surrounding their links with the Papuan concessions. The letter is currently with the RSPO complainants for review.</li> <li>Unilever met with PIL to discuss the case (March 2020).</li> <li>Unilever continues to engage and have direct meetings with Pacific Interlink with regards to PIL's sustainability roadmap. Unilever was present at the session hosted by the HSA group and RSPO at the RSPO RT to understand the progress and update on the RaCP process (November 2022).</li> </ul>
B11	Nov 2017	Mighty Earth, Greenpeace	<p><b>Deforestation allegation in Central Kalimantan</b></p> <ul style="list-style-type: none"> <li>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</li> </ul>	<p>Anglo Eastern Plantations (AEP)</p> <p>Unilever does not have any direct business</p>	<ul style="list-style-type: none"> <li>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).</li> </ul>

			<p>clearance of 420 ha of forest. Also, allegations that prior to Oct 16, 2017, there were 3,593 ha of forest cleared. Information in <a href="#">Rapid Response 1</a> (November 2017).</p> <ul style="list-style-type: none"> <li>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 "<a href="#">Final Countdown</a>" (Sept 2018).</li> <li>Allegations of further clearing at PT KAP was raised by Mighty Earth in <a href="#">Rapid Response 14</a> (April 2019).</li> </ul>	<p>relationship with Anglo Eastern Plantation.</p>	<ul style="list-style-type: none"> <li>GAR has been engaging directly with AEP with regards to HCSA and monitoring the moratorium at PT KAP. Our direct supplier, Wilmar, is also engaging directly with PT AEP.</li> <li>In March 2018, AEP appointed PT Meganesia Tirta Foresta to conduct a HCS assessment at PT KAP and shared the results with our suppliers such as GAR and Wilmar. More information available on Wilmar's <a href="#">Grievance List</a>.</li> <li>Following indication of new deforestation allegation in 2019, Unilever suppliers have reached out to AEP to request clarification. More information on GAR's engagement with AEP and HCSA can be found on their <a href="#">grievance list</a> (May 2020).</li> <li>Unilever met with AEP in to understand the group's progress with regards to sustainability and ongoing review at the HCSA (January 2021).</li> <li>AEP provided an <a href="#">update</a> on the HCSA process and included in it a commitment to conserving the remaining plasma area (February 2021).</li> </ul>
B10	May 2017	Greenpeace, Environmental Investigation Agency (EIA), Foresthints.com	<p><b>Deforestation allegation</b></p> <ul style="list-style-type: none"> <li>EIA submitted first-ever <a href="#">grievance</a> 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).</li> <li>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).</li> <li><a href="#">Foresthints.com</a> 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</li> </ul>	<p>Ciliandry Anky Abadi (CAA)</p> <p>First Resources (PT Limpah Sejahtera)</p> <p>Unilever does not have any direct business relationship with CAA or First Resources.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>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).</li> <li>Unilever has stopped buying from First Resources from Q1 2018.</li> <li>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).</li> <li>In September 2018, First Resources clarified through statements linked to their <a href="#">grievance list</a> 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 <a href="#">here</a>.</li> <li>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).</li> <li>Wilmar reported to Unilever that their last purchase from CAA was in March 2018, as listed on their <a href="#">Grievance List</a>.</li> <li>Musim Mas engaged with First Resources through mill verification and later to raise concerns on the allegations. For more information, refer to Musim Mas <a href="#">grievance list</a>.</li> </ul>

			<p>Unilever’s 2017 palm oil mill list of direct and indirect suppliers (February 2018).</p> <ul style="list-style-type: none"> <li>• 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 “<a href="#">Final Countdown</a>” (Sept 2018).</li> </ul>		<ul style="list-style-type: none"> <li>• In December 2018, a complaint was made to the RSPO alleging that First Resources/PT Lintah Sejahtera withheld information on peat planting as part of the RSPO RaCP Land Use Change Analysis (LUCA) for the compensation calculation, and after reviewing the evidence, the RSPO issued its findings in March 2019 that the LUCA was null and void and had to be repeated.</li> <li>• In April 2019, Unilever met with First Resources to discuss sustainability roadmap, grievances resolution, leverage on associated companies, and communicating progress.</li> <li>• The case is transferred to the RSPO Investigation and Monitoring Unit in May 2019. See <a href="#">statement</a> issued by the RSPO Complaints Panel.</li> </ul>
B9	April 2017	Oxfam, Guatemala Human Rights Commission, and coalition of NGOs	<p><b>Alleged land and community noncompliance in Guatemala</b></p> <p>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"> <li>• <a href="#">Oxfam published a blog update</a> on REPSA (April 2017).</li> <li>• <a href="#">Open letter from NGOs</a> to all buyers of REPSA (April 2017).</li> <li>• <a href="#">Open letter from NGOs</a> to buyers of REPSA (June 2021).</li> <li>• Joint letter from civil society organizations on REPSA (January 2022).</li> </ul>	<p>REPSA (Reforestadora de Palma S.A.)</p> <p>Unilever does not have any direct business relationship with REPSA on a group level.</p>	<ul style="list-style-type: none"> <li>• <a href="#">REPSA issued a response</a> to the open NGO letter (May 2017) and a <a href="#">Sustainability Action Plan</a> 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). <a href="#">First</a>, <a href="#">second</a>, and <a href="#">final</a> progress reports can be found on their website.</li> <li>• In 2017, Unilever found that REPSA oils potentially came into Unilever’s supply chain via Cargill and Wilmar. 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.</li> <li>• Cargill engaged with the supplier and stated that it no longer buys from REPSA. Cargill is engaging REPSA on a re-engagement plan (2018). Detailed information on their engagement is available on Cargill’s <a href="#">grievance list</a>.</li> <li>• 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 <a href="#">Grievance List</a>.</li> <li>• With regards to the open letter raised in 2021, Unilever confirms that it has no direct business with REPSA, but that it may be indirectly linked through trade with two suppliers in 2020. The first, Naturaceites, reported that their logistical arrangement with a Grupo HAME mill ended in 2020.</li> <li>• We notified the other supplier, a chemical manufacturer in the United States, of the concerns raised and the supplier removed REPSA from its supply chain in 2021.</li> </ul>

B8	January 2017	Greenpeace, Environmental Investigation Agency	<p><b>Deforestation allegation</b></p> <ul style="list-style-type: none"> <li>Greenpeace released the report "<a href="#">Dirty Bankers</a>" making allegations with respect to certain major banks and their financing of palm oil companies (January 2017).</li> <li>EIA submitted first-ever <a href="#">grievance</a> 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).</li> <li><a href="#">HSBC requests RSPO to investigate allegations</a> of deforestation by Noble Plantations in Papua; RSPO advises Noble to suspend development on the concession (July 2017).</li> <li>Greenpeace release "Palm Oil Alert 4" including allegations concerning Noble, Korindo, and POSCO Daewoo (September 2017).</li> <li>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 "<a href="#">Final Countdown</a>" (Sept 2018).</li> </ul>	<p>Noble Group</p> <p>Unilever does not have any direct business relationship with the Noble Group.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>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.</li> <li>Unilever decided in October 2017 not to continue business with Noble Natural Resources India (Noble Group/COFCO). Noble published a <a href="#">Sustainability Information Document</a>, and submitted a <a href="#">letter</a> to the complaints panel, citing a "stop work" order has been put in place in PT Pusaka Agro Lestari (October 2017).</li> <li>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 <a href="#">grievance list</a>. Their last purchase is in December 2016.</li> <li>The RSPO Complaints Panel decided in January 2018 to proceed with independent verification of the assessments conducted by Noble.</li> <li>The RSPO Complaints Panel issued a <a href="#">decision letter</a> (February 2019), requesting the company to undergo the Remediation and Compensation Process (RaCP) and submit a remediation plan.</li> <li>Noble is resigning from the RSPO (May 2020). RSPO CP issued a <a href="#">letter</a> in response. Unilever is monitoring the <a href="#">complaint resolution progress</a> on the RSPO website.</li> <li>Noble is not in Unilever's indirect supply chain per June 2018.</li> </ul>
B7	November 2016	Amnesty International, Environmental Investigation Agency (EIA)	<p><b>Alleged labor exploitation issues</b></p> <ul style="list-style-type: none"> <li>BEST group was a supplier of Wilmar with alleged labor exploitation in an Amnesty International Report, "<a href="#">The Great Palm Oil Scandal</a>" (November 2016).</li> <li><a href="#">A Central Kalimantan court ordered the local government to review the plantation permits</a> of companies implicated in the 2015 haze, after a case was submitted in 2016: Wilmar, BEST, GAR, and Bumitama included (2017).</li> </ul>	<p>BEST Group</p> <p>Unilever does not have any direct business relationship with the BEST Group.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>Unilever sent PT Global Interinti a letter of concern, dated December 2, 2016, on the allegations raised by Amnesty International.</li> <li>Unilever stopped buying directly from the BEST Group in May 2016.</li> <li>Wilmar put on hold purchases from PT BEST from <a href="#">June 2017</a>.</li> <li>We reiterated our request that suppliers exclude BEST from supply to Unilever in April 2020.</li> </ul>
B6	November 2016	Rainforest Action Network (RAN)	<p><b>Deforestation in Leuser Ecosystem (Aceh) allegation</b></p>	<p>PT Surya Panen Subur II</p>	<ul style="list-style-type: none"> <li>Unilever has been engaging with RAN and major direct suppliers, directly and via email.</li> </ul>



			<p>RAN released a report "<a href="#">Protecting the Leuser Ecosystem</a>" (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 <a href="#">Leuser Watch</a> 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 <a href="#">guilty</a> by the State Prosecutor's Office of clearing of peat forests (2016). RAN has further <a href="#">reported</a> 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>Unilever does not have any direct business relationship with PT Surya Panen Subur II (PT SPS II).</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• 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 (October 2018).</li> <li>• <b>GAR</b> supported PT SPS in their Collaboration for Transformation (CFT) programme, which completed conflict resolution process implementation (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. 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. A high-level meeting was held between GAR and SPS II, during which GAR asked for a more concrete solution for the ongoing deforestation caused by encroachment in SPS II concession. More information on <a href="#">GAR grievance list</a> (July 2018).</li> <li>• <b>Musim Mas</b> do not list SPS II in their grievance list but have engaged with other suppliers in the Singkil regency (Pati Sari, Sisirau, Mopoli Raya, Ensem Sawita, Ensem Lestari, Bangun Sempura Lestari). More information on Musim Mas' <a href="#">grievance list</a>.</li> <li>• <b>Wilmar</b> reported that PT SPS II has 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's last purchase was in June 2018. 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 <a href="#">Grievance List</a>.</li> <li>• <b>ADM</b> reached out to supplier Wilmar and are satisfied with their handling of the issue. Source: <a href="#">ADM Grievances and Resolutions Summary Table</a>.</li> <li>• <b>Bunge</b> states it does not directly supply from the area but may be indirectly exposed through traders. In December 2018, PT SPS II is no longer in Bunge's supply chain. Source: Bunge Loders Croklaan <a href="#">grievance list</a>.</li> <li>• <b>Cargill</b> 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 &amp; response systems which can</li> </ul>
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					<p>strengthen the work in Leuser. Surya Panen Subur II is no longer in Cargill's supply chain. Source: <a href="#">Cargill indirect grievance list</a>.</p> <ul style="list-style-type: none"> <li>Following concerns of alleged ongoing clearings in the Leuser ecosystem, Unilever contacted suppliers to reconfirm PT SPS II is not in their supply chain (May 2019).</li> </ul>
B5	Nov 2016	Rainforest Action Network (RAN)	<p><b>Deforestation in Leuser Ecosystem (Aceh) allegation</b></p> <ul style="list-style-type: none"> <li>RAN released a report "<a href="#">Protecting the Leuser Ecosystem</a>" (2016) alleging illegal deforestation of elephant habitat by PT. ABN (alleged to be connected to Wilmar) within the Leuser Ecosystem.</li> <li>This is followed up by another <a href="#">article by RAN</a> (February 2017) and a <a href="#">report</a> (July 2017) alleging that PT Agra Bumi Niaga (PT ABN) is responsible for ongoing clearance in 2017.</li> <li><a href="#">Guardian article</a> alleged Unilever and other big brands of "complicity in rainforest destruction" due to oil coming from PT ABN to in the supply chain (2017).</li> </ul>	<p>Agra Bumi Niaga (PT ABN)</p> <p>PT ABN sold FFB to PT Ensew Sawita, a mill that supplied to Unilever's direct supplier Wilmar, Musim Mas, and GAR.</p> <p>Unilever does not have any direct business relationship with PT ABN.</p>	<ul style="list-style-type: none"> <li>Unilever wrote to Wilmar, Musim Mas, and GAR regarding the allegations and are monitoring action plans conducted with these traders (2017).</li> <li>PT Ensew Sawita confirmed that all purchases of palm oil from PT ABN have ceased (August 2017). This information, along with key engagements done by GAR and Musim Mas are <a href="#">reported by GAR</a> in September 2017.</li> <li>ABN is not in Unilever's indirect supply chain per June 2018.</li> <li>In February 2020, RAN informed Unilever that they see the adoption of commitment of NDPE and HCV/HCS by <a href="#">Agra Bumi Niaga</a> as a "credible response to address the deforestation previously carried out by the companies, which should trigger a re-entry process." Unilever does not have any direct contract with any of the above suppliers but supports our suppliers' decision to continue engaging with Agra Bumi Niaga.</li> </ul>
B4	Sept 2016	Greenpeace, Environmental Investigation Agency (EIA), Foresthints.com, Mighty Earth	<p><b>Deforestation allegation</b></p> <ul style="list-style-type: none"> <li>In September 2016, Greenpeace report '<a href="#">Deadly Trade-off</a>' 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.</li> <li>EIA submitted first-ever <a href="#">grievance</a> 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).</li> <li>Greenpeace Deforestation Case Studies (not disclosed to the public) contained allegations</li> </ul>	<p>Austindo Nusantara Jaya</p> <p>Unilever does not have any direct business relationship with PT ANJ.</p>	<ul style="list-style-type: none"> <li>ANJ adopted a "No Deforestation, No Peat, No Exploitation (NDPE)" <a href="#">policy</a> in November 2016.</li> <li>Unilever wrote to suppliers who had previously declared that they have bought directly or indirectly from ANJ mills regarding these allegations (March 2018).</li> <li>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).</li> <li>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.</li> <li>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.</li> </ul>

			<p>of continued deforestation in West Papua in the second half of 2017.</p> <ul style="list-style-type: none"> <li>• <a href="#">Foresthints.com stated</a> allegations that Unilever is connected to ANJ which has been clearing High Carbon Stock (HCS forests) in Papua since 2017 (March 2018).</li> <li>• 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 "<a href="#">Final Countdown</a>" (Sept 2018).</li> <li>• In a September 2018 letter to Unilever, Mighty Earth raised a grievance in <a href="#">Rapid Response 4</a> and <a href="#">Rapid Response 6</a> alleging ANJ of further deforesting 82ha peat forests between May and July 2018.</li> <li>• In November 2018, <a href="#">Chain Reaction Research reported</a> allegations that ANJ's continued land clearing violated the newly adopted RSPO P&amp;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.</li> </ul>		<ul style="list-style-type: none"> <li>• Unilever issued a public response to the Greenpeace campaign "Final Countdown" (September 2018).</li> <li>• Unilever issued a response letter to Mighty Earth in October 2018 and met with Mighty Earth in December 2018.</li> <li>• Wilmar and GAR have reported in public grievance lists that they do not source from the supplier. Musim Mas' last purchase was in 2015 but it continued to engage the supplier on HCS/HCV afterwards. See Musim Mas <a href="#">grievance list</a>. KLK has stopped trading relationship with ANJ since December 2016. 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 <a href="#">Grievance Log</a>. Bunge has stopped sourcing from ANJ, per its latest <a href="#">grievance list</a> and mills list Q4 2018.</li> <li>• GAR engaged ANJ regarding the suspended supplier re-engagement protocol checklist (May 2019). In line with this protocol, ANJ has committed to a <a href="#">group-wide moratorium</a> and group-wide sustainability/<a href="#">NDPE policy</a>, updated its grievance disclosure, and submitted a report on its HCS clearance liability, target recovery area, and a framework for rehabilitation project. It has also shared concession maps to GAR. (March 2020). GAR has subsequently changed the engagement status with ANJ into "Monitoring" and informed Unilever on the progress (April 2020). More information on GAR <a href="#">grievance list</a>.</li> </ul>
B3	June 2016	Rainforest Action Network (RAN), OPPUK, ILRF, Greenpeace, Aidenvironment, Rainforest Foundation Norway, and SumofUs	<p><b>Allegations of Labor rights violations</b></p> <ul style="list-style-type: none"> <li>• In June 2016, RAN, OPPUK and ILRF published a report titled, "<a href="#">The Human Cost of Conflict Palm Oil</a>" 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.</li> <li>• Alleged clearance and labor issues in Indofood Agri were reported again in the Greenpeace report "<a href="#">Deadly Trade-Off</a>" (Sept 2016).</li> </ul>	<p>Salim Group/Indofood Agri/Indogunta</p> <p>Unilever does not have any direct business relationship with the Salim Group/Indofood Agri/Indogunta.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• Indofood Agri uploaded a <a href="#">Sustainability Policy</a> on their website (August 2017).</li> <li>• Unilever wrote to suppliers who had declared that they have bought directly or indirectly from Indofood mills in 2017 regarding these allegations.</li> <li>• KLK has put on hold purchases from Indofood with effect from September 2016. Source: KLK's <a href="#">Grievance List</a>.</li> <li>• On their <a href="#">grievance list</a>, 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</li> </ul>

			<ul style="list-style-type: none"> <li>• RAN filed a formal complaint at the RSPO against PT PP London Sumatra and its parent company PT Salim Ivomas Pratama Tbk. (October 2016).</li> <li>• <a href="#">Greenpeace dismissed new palm oil policy</a> issued by Indofood’s agriculture subsidiary Indofood Agri Resources Ltd, "as inadequate in both substance and scope" (March 2017).</li> <li>• <a href="#">Greenpeace issued a palm oil alert</a> for Indofood/Salim Group, citing environmental and social issues (May 2017).</li> <li>• <a href="#">ILRF update</a> reported their follow-up investigations to find "no real changes" to the alleged labor working conditions (August 2017).</li> <li>• In November 2017, RAN, OPPUK and ILRF published "<a href="#">The Human Cost of Conflict Palm Oil Revisited</a>", detailing new allegations of labor abuses on certified plantations owned by Indofood.</li> </ul> <p><b>Draining and clearing of peat allegations</b></p> <ul style="list-style-type: none"> <li>• Aidenvironment, commissioned by RAN, published "<a href="#">Palm oil sustainability assessment of Salim-related companies in Borneo peat forests</a>" (April 2018) alleging Salim-linked companies are draining the Ketungau peat swamp in Sintang, West Kalimantan, Indonesia. <ul style="list-style-type: none"> <li>• PT Duta Rendra Mulya (PT DRM)</li> <li>• PT Sawit Khatulistiwa Lestari (PT SKL)</li> </ul> </li> <li>• Greenpeace included Indofood Agri and deforestation cases allegedly done by PT DRM and 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 "<a href="#">Final Countdown</a>" (Sept 2018). Between April 2015 and March 2018.</li> </ul>		<p>verification results, and provide an open channel for communication with all stakeholders (February 2018).</p> <ul style="list-style-type: none"> <li>• Unilever issued a <a href="#">public statement</a> 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).</li> <li>• RSPO field verification <a href="#">planned for June 2018</a> (this was halted by complainants not revealing exact location, but Indofood Agri have sent a <a href="#">Non-reprisal</a> to the RSPO confirming that there will be no intimidation of workers/complainants).</li> <li>• Musim Mas announced a temporary cessation in business relationship with Indofood Agri since August 2018. More information is available on <a href="#">Musim Mas website</a> (September 2018).</li> <li>• Unilever met with RAN to discuss the concerns (October 2018).</li> <li>• RSPO Complaints Panel issued a <a href="#">Final Decision Letter</a> (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.</li> <li>• In November 2018, Unilever <a href="#">issued a public statement</a> responding to the decision of the RSPO Complaints Panel.</li> <li>• 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 <a href="#">here</a> (November 2018).</li> <li>• In January and February of 2019, Indofood Agri companies (PT Salim Ivomas Pratama and PT PP London Sumatra Indonesia) issued <a href="#">letters of resignation</a> from the RSPO membership. In the same month, RSPO issued a <a href="#">letter of termination</a> of membership of the two companies.</li> <li>• No Indogunta group mills are present in Unilever supply chain in 2019. Unilever listed mills and plantations identified as belonging to the Indogunta group in a Suspended Suppliers List to suppliers (April 2020).</li> </ul>
B2	May 2016	Chain Reaction Research (CRR),	<b>Deforestation and NDPE non-compliances allegation</b>	Citra Borneo Indah (CBI) Group/Sawit	<ul style="list-style-type: none"> <li>• Following the independent verification process conducted by Daemeter to review the allegations against Citra Borneo Indah</li> </ul>

		Foresthints, Greenpeace	<ul style="list-style-type: none"> <li>• In <a href="#">a sustainability benchmark report of palm oil growers</a> 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.</li> <li>• <a href="#">Chain Reaction Research release new report</a> "Sawit Sumbermas Sarana: Supplying the Palm Oil Leakage Market, Risks for Purchasers" (June 2017).</li> <li>• <a href="#">Foresthints.com</a> 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).</li> <li>• 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 "<a href="#">Final Countdown</a>" (Sept 2018).</li> </ul>	<p>Sumbermas Sarana (SSMS)</p> <p>Unilever does not have any direct business relationship with CBI/SSMS.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<p>(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 <a href="#">public statement</a> regarding Unilever's position on this grievance.</p> <ul style="list-style-type: none"> <li>• In September 2017, SSMS released a <a href="#">Sustainability Policy</a> (NDPE) and is developing a roadmap to comply with new policy.</li> <li>• The SSMS group undertook assessments of the areas reported by Foresthints.com and published a <a href="#">response on their website</a>. 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.</li> <li>• Unilever supplier Bunge has stopped sourcing from PT SSMS, as is indicated on their <a href="#">grievance list</a> (accessed February 2019).</li> <li>• Unilever continues to monitor progress and engage directly with SSMS in the action plans and remediation plans relating to the allegations, and had since met with SSMS and its sustainability partner Daemeter in September 2019 and January 2020. SSMS updated Unilever on its roadmap to be 100% RSPO certified by 2020. More information available <a href="#">here</a>.</li> </ul>
B1	October 2015	Coalition of civil society groups, Greenpeace, Chain Reaction Research	<p><b>Allegations of labor rights violations and deforestation</b></p> <ul style="list-style-type: none"> <li>• <a href="#">FELDA-FGV RSPO complaint</a> was made related to allegations on breached labor conditions in their plantations, following an article on the Wall Street Journal (October 2015).</li> <li>• RSPO issued a <a href="#">response</a> 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 <a href="#">here</a>.</li> <li>• In November 2015, A coalition of civil society groups issued a <a href="#">response</a> to the investigation.</li> </ul>	<p>FELDA/Felda Global Ventures (FGV)</p> <p>Unilever does not have any direct business relationship with FELDA/FGV.</p> <p>Please also refer to the <a href="#">Unilever's Suspended or No-Buy List of Palm Oil Companies</a> (August 2022).</p>	<ul style="list-style-type: none"> <li>• <b>Deforestation on Peat Allegations</b></li> <li>• Unilever engaged IFFCO (Malaysia) Bhd. and FELDA-IFFCO regarding allegations by Greenpeace through the July 2017 Palm Oil Alert.</li> <li>• FGV informed on the <a href="#">enhancement of the peat protection clause</a> in the Group's Sustainability Policy (August 2017).</li> <li>• Unilever reached out after receiving a report by Greenpeace about their alleged non-compliance with Unilever's Sustainable Palm Oil Policy (January 2018).</li> <li>• Unilever no longer sources directly from Felda-IFFCO since January 2018, but continued to engage with FGV and IFFCO to discuss their sustainability plans (August - November 2018).</li> <li>• FGV published sustainability updates in <a href="#">January</a> and <a href="#">April</a> 2018, which contain updates on FGV's Social Compliance and Human Rights action plan and Peat Restoration Master Plan. FGV Announced that it had submitted a Peat Restoration Plan for approval to the Ministry of Environment and Forestry (KLHK).</li> </ul>

		<ul style="list-style-type: none"> <li>• <a href="#">In a letter</a>, 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).</li> <li>• Allegations that <a href="#">FGV continued to clear peat forest at PT TAA in West Kalimantan</a>. Drone images alleged to show ongoing deforestation (April 2017). A case is logged at the RSPO Complaints Panel.</li> <li>• Greenpeace released a Palm Oil Alert on FelDA allegations and calls for measures to be taken by companies (July 2017).</li> <li>• 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 "<a href="#">Final Countdown</a>" (Sept 2018).</li> <li>• RSPO Complaints Panel issued a <a href="#">decision letter</a> following an independent verification visit (November 2018).</li> </ul>		<ul style="list-style-type: none"> <li>• 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 under ‘Economic’ category, their hydrological function would be maintained. More information on KLK’s <a href="#">Grievance List</a>.</li> <li>• Unilever is also monitoring progress through supplier Sime Darby, which has indicated it purchased from FGV (not from its Indonesian operations) and is engaging with FGV directly. Information is available on Sime Darby’s <a href="#">Grievance Register</a> (April 2019).</li> <li>• Cargill continues to directly engage with FGV. FGV provided an update that they are mediating community pressure for development and stepping up monitoring for community fires and encroachment in Kalimantan. More information on Cargill’s direct supplier <a href="#">Grievance Log</a> (accessed April 2019).</li> <li>• RSPO Complaints Panel issued a decision letter with regards to the 1,600 ha peat clearing in Kalimantan. PT TAA to <a href="#">carry out a new soil survey</a> and report on engagement with aggrieved communities within 30 and 60 days respectively (October 2019). Survey plan had been submitted.</li> <li>• RSPO Complaints Panel issued a <a href="#">letter</a> responding to the Respondent’s proposal for soil survey (July 2020). Complaint is closed and transferred to the Investigation and Monitoring Unit (IMU) for monitoring (August 2020).</li> </ul> <p><b>Labor issues allegations</b></p> <ul style="list-style-type: none"> <li>• FELDA/FGV submitted an <a href="#">action plan</a> to the RSPO, and RSPO Secretariat formulated a verification exercise (2016-2017).</li> <li>• Unilever engaged with IFFCO (Malaysia) Bhd. and FELDA-IFFCO regarding allegations brought by Greenpeace through the July 2017 Palm Oil Alert.</li> <li>• Unilever reached out after receiving a report by Greenpeace about their alleged non-compliance with Unilever’s Sustainable Palm Oil Policy (January 2018).</li> <li>• FGV announced <a href="#">enhancement</a> to FGV’s sustainability policy focusing on peat management, HCS Approach adoption, human rights, worker welfare, and local communities. (April 2018).</li> <li>• Unilever no longer sourced directly from FelDA-IFFCO and IFFCO since January 2018, but continued to engage with FGV and IFFCO to discuss their sustainability plans (August - November 2018).</li> </ul>
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