



## **WILMAR REACHES RESOLUTION WITH RSPO**

Wilmar International Limited (“Wilmar” or the “Company”) refers to the official statement issued by the Roundtable on Sustainable Palm Oil (“RSPO”) Executive Board on 1 February 2008, in relation to the inquiry of concerns raised by certain civil society organizations over part of Wilmar’s palm oil operations.

The Company was informed by RSPO that “It was consensually decided by 31<sup>st</sup> January, 2008 that the response was acceptable to RSPO.” There are three items in the response that still require follow up but RSPO stated that “None of the three items, individually or collectively, were considered as invalidating the acceptability of the response.”

“Wilmar is firmly committed to corporate social responsibility. We welcome the resolution of this matter with the RSPO as a step forward for promoting sustainable palm oil cultivation. The thorough operations review that was carried out has strengthened our environmental and social management systems and processes to support this goal.” said Mr. Jeremy Goon, Head of CSR for Wilmar.

Wilmar reaffirms its commitment to incorporate the recently formalized RSPO Principles & Criteria into its operations to meet and further improve on our capability to fulfill social, environmental and commercial needs.

Please refer to Appendix A for RSPO’s official statement issued on 1 February, 2008 and to Appendix B for Wilmar’s response to the RSPO on 25<sup>th</sup> January, 2008.

**Issued by**  
**Wilmar International Limited**

4 February 2008

**Wilmar International Limited Announcement:** Wilmar Reaches Resolution with RSPO

Appendix A – Latest Update: Complaint against Wilmar International Ltd.

Source: [www.rspo.org](http://www.rspo.org)

Wilmar's response to the RSPO Grievance Panel Recommendations was received by the RSPO Secretariat on 28th January, 2008.

The response was sent to all members of the Panel on the 29th of January, 2008.

All the members of the Panel studied the response and replied.

It was consensually decided by 31st January, 2008 that the response was acceptable to RSPO.

There are three items in the response where further assurance is to be secured and the RSPO Secretariat in Kuala Lumpur and the RILO office in Jakarta will follow-up on this and report within a month to the Grievance Panel. These matters and assurances will also be posted on the RSPO website.

None of the three items, individually or collectively, were considered as invalidating the acceptability of the response.

It was recommended that the Secretariat inform the parties concerned and make available the Wilmar response on the RSPO website.

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RSPO Secretariat  
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Malaysia

25<sup>th</sup> January 2008

Dear Dr. Rao,

With reference to the electronic mail dated 24<sup>th</sup> December 2007, sent by Mr. Andrew Ng seeking a re-constituted response from us on the Complaint raised against Wilmar to the RSPO Grievance Panel, please find herewith our response and additional questions asked by the Grievance Panel.

Furthermore, we would also like to reiterate our support for the RSPO and appreciate the challenges faced by the industry on key issues like HCVF and have agreed in principle to a supportive and active collaboration with the London Zoological Society and the International Finance Corporation to set up and administer the RSPO Technical Committee on Biodiversity. Details are being worked out.

Please do not hesitate to contact me should there be any further questions.

We remain as ever fully committed the process of sustainable palm oil and RSPO principles and criteria.

Yours faithfully,  
WILMAR INTERNATIONAL LIMITED

A handwritten signature in black ink, appearing to read 'Jeremy Goon', is written over the company name.

Jeremy Goon  
(Group Head – CSR)

cc:

Wilmar:

Chua Phuay Hee, Executive Director

Teo Kim Yong, Executive Director

## Appendix

### Complaint against Wilmar International Ltd. – Grievance List and Response Request.

The following provides a listing of grievances that you have to respond to. Each grievance is itemised (through a Grievance No) and you are asked if you accept or deny each item. An explanation is also expected, which should elaborate on salient points that support the decision on your part and next-steps.

Grievance No	Article reference, complaint lodged.
WIL-01	<p>RSPO Code of Conduct Art. 2.1 "Members will not make any misleading or unsubstantiated claims about the production, procurement or use of sustainable palm oil."</p> <p><b>Grievance raised: Wilmar Intl. Ltd. Is not complying with Art 2.1.</b></p> <p>Substantive argument made by complainant: Wilmar International Ltd's Annual Report 2006 in May 2006. In the section on Corporate Social Responsibility it states on page 37: "In November and December 2006, Control Union Certifications (The Netherlands) conducted a chain of custody audit on Wilmar's plantations, mills, refineries and bulk storage facilities in Indonesia. The audit was commissioned by Essent, a Netherlands-based power company. The findings indicted that crude palm oil from Wilmar's plantations and used by its refineries in producing refined products, were sustainably produced and traceable for the entire production process and chain." (Positioned for Growth, Wilmar, Annual Report 2006, page 37, website accessed July 19th, 2007, (<a href="http://www.wilmar-international.com/investor/Annual%20Report%202006.pdf">http://www.wilmar-international.com/investor/Annual%20Report%202006.pdf</a>).</p> <p>This claim and report was globally distributed by Wilmar among its shareholder, bankers, buyers and other stakeholders. A similar claim on Wilmar's website was change on June 14th , 2007, but no other rectification has been found and the online Annual Report 2006 has not been changed or amended.</p> <p><b>Answer:</b></p> <p>Being committed to achieving higher sustainability standards, we co-operated with one of our stakeholders in reviewing the sustainability issues highlighted by European policy makers and other institutes / stakeholders in relation to sustainable biomass production. It was with best intentions to collaborate with all stakeholders in a meaningful and engaging manner and to learn from this process by involving a third party to review the process.</p> <p>Some background information regarding this matter is that, Essent, who is a member of RSPO committed to sustainability of biofuel production, requested an assessment based on The Green Gold Label Standard Principles. The Green Gold Label program is a certification system for sustainable biomass. To execute the request, Essent appointed Control Union Certifications (The Netherlands), whose certifications are accepted by authorities in nearly every country in the world. We acceded to this request in the spirit of collaboration.</p> <p>Further to what is stated in the above grievance, we would like to explain that the line that</p>

immediately follows the above quoted portion of the Annual Report reads: "As a result of the study, a Green Gold Label Certificate (GGL01 Certificate) for Chain of Custody and Processing Standards was awarded to Wilmar in January 2007".

The GGL01, according to Control Union Certifications, states that its standard covers all transactions of products produced, processed, prepared or bought for marketing purposes by operators participating in the Green Gold Label Programme. In Wilmar's instance, this showed that the company has a system in place to trace CPO back to its plantations. This complies with publicly available criteria as an agricultural source Green Gold Label (sustainable source as per GGL02 Standard) under a mass balance system.

In the same section of the Annual Report, we have also stated the following: "In January 2007, Wilmar commissioned a Verification Audit on its compliance to the RSPO principles and criteria in six Indonesian provinces to benchmark its overall E+S performance. This verification audit will enable Wilmar to further enhance its E+S management vis-à-vis the RSPO principles and criteria, and make continuous improvement."

In this context, we wish to clarify that, to date, there has not been any reference to compliance to RSPO principles & criteria in either our annual report or our website.

As a committed member of RSPO, we are fully aware of the requirement that claims of sustainable palm oil according to RSPO P&C can only be made upon certification/verification by RSPO accredited Certification Bodies. It is premature to interpret sustainable palm oil as synonymous only with RSPO-certified palm oil.

As part of our commitment to sustainable palm oil production and use and the RSPO process, we will diligently work towards RSPO certification/verification of our palm oil and its derivatives as they become available to members.

WIL-02

RSPO Principles & Criteria for Sustainable Palm Oil Production (P&C) Criterion 2.2 "The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights."

P&C Criterion 2.3 "Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent."

P&C Criterion 7.5 "No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions."

**Grievance raised: Wilmar companies PT Wilmar Sambas Plantation, PT Buluh Cawang Plantation and Agro Nusa Investama in Sambas District, West Kalimantan did not adhere to the 3 criteria in land clearing, leading to local conflicts.**

Substantive argument made: Reference is made to the report *Policy, Practice, Pride and Prejudice*, Chapter 5 for details and evidence supporting complaint. Wilmar companies are alleged to have commenced land clearing without ensuring compliance to relevant laws and procedures for land acquisition, as well as conducting proper consultation with communities in the plantation project areas for the 3 companies. Additional allegation that land clearing beyond given boundaries was carried out by PT Wilmar Sambas Plantation.

**Answer:**

Wilmar fully understands the grievance and would like to clarify this in the context of our socially responsible policies, the nature of Indonesian laws and finally, what is being practiced at Wilmar.

As a matter of policy at Wilmar, we respect the land rights of local communities and will not establish plantations without their free, prior and informed consent. Furthermore, Wilmar views the commencement of land clearing and planting activities without a legally valid plantation permit as an unacceptable practice.

In so far as Indonesian laws are concerned, official regulations and engagement procedures concerning the status of the land are not always clearly defined. Licensing processes are heavily de-centralized and involves multiple stakeholder approvals whereby requirements may vary. Issues relating to local approvals processes and land security are a sector-wide concern, as well for directly affected communities.

In reviewing the 3 cases mentioned above for land acquisition, compensation and environmental impact assessments, we acknowledge that these went against Wilmar's procedures and policies. It is unfortunate, and now regretful, that the action to commence land clearing and planting activities were based on an irregularly issued IUP (Plantation Operation Permit). As such, since 8<sup>th</sup> November 2007, all land clearing and planting in PT WSP, PT BCP and PT ANI have been stopped.

Simultaneously, we have placed a moratorium on new plantation development in new areas until environmental impact assessments (EIAs) have been duly completed. Similarly, we have engaged an Independent consultant to conduct High Conservation Value Forest (HCVF) Assessments in all these new projects.

With regards to criterion 7.5, Wilmar has started working with the Compliance Advisor Ombudsman (CAO) of the World Bank and International Finance Corporation, who will be facilitating the process to directly engage all the relevant local communities in areas of concern. At a meeting convened by the CAO on the 6<sup>th</sup> of December 2007, community leaders from the Sambas region, as well as national and international Civil Society Organizations, discussed a proposal to begin dialogue with Wilmar to resolve the concerns expressed in their complaints to the CAO. Both Wilmar and the complainant group support a draft memorandum of Understanding to work together with the CAO, and are now actively looking for practical ways to resolve some of the preconditions requested by the complainants so that substantive negotiations can move forward. This process is on-going. We sincerely hope that with an open communication and fair and transparent stakeholder consultation session, and with a participatory approach, we will be able to achieve a fair and equitable solution for all parties concerned.

	<p>We wish to once again reiterate that Wilmar has made it a policy not to develop oil palm in areas where the local communities are not supportive, divided or dispute development. We have no objection to re-asserting this policy publicly, and assuring communities in Senujuh and Sasak in West Kalimantan (and elsewhere if necessary) that no further expansion will take place if such expansion is disputed. We are working closely with the CAO and will abide by their mediation process towards an amicable and successful resolution acceptable to all parties. This process is on-going.</p> <p>In areas where Wilmar's presence is welcomed, and communities are happy with the socio-economic benefits it may bring, we will continue to play an active role in enhancing socio-economic development, especially through employment and the plasma small-holder schemes.</p> <p>Concurrently, these incidences are being thoroughly examined and evaluated and improvements in our social procedures will be immediately implemented.</p> <p>In addition, we are also looking at ways to enhance the effectiveness of our Land Claims Resolution System by using an inclusive multi-stakeholder approach, working closely especially with local Civil Society Organizations.</p> <p>To ensure full compliance of RSPO Principles &amp; Criteria within Wilmar, an RSPO implementation committee has been formed, which reports to the Board of Directors and each region has a sustainability department to ensure compliance, as well as a central co-ordination person in charge. The role of the sustainability department is to facilitate and monitor the implementation of RSPO Principles and Criteria at the operational level through a surveillance compliance audit. This sustainability department is independent of the plantation and mill operation and is represented in the board of directors through our internal sustainability council chaired by our Chairman &amp; CEO.</p> <p>Any issues raised during the internal audit exercise will be addressed by the RSPO implementation committee which is led by the operating head of the respective regions.</p>
WIL-03	<p>RSPO Principles &amp; Criteria for Sustainable Palm Oil Production (P&amp;C) Criterion 2.1 "There is compliance with all applicable local, national and ratified international laws and regulations."</p> <p>P&amp;C Criterion 7.1 "A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and</p>

## Appendix 2

	<p>operations."</p> <p><b>Grievance raised: The EIA reports from PT Wilmar Sambas Plantation and PT Buluh Cawang Plantation are of poor quality, provide no meaningful guidance to understanding the impacts of the companies' activities and do not allow for proper planning and</b></p>
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	<p><b>monitoring.</b></p> <p>Substantive argument: Reference is made to the report <i>Policy, Practice, Pride and Prejudice</i>, Chapter 4 for details and evidence supporting complaint. Need for officially approved EIA report from relevant Indonesian authorities before issuance of Plantation Operation Order from District Head noted in this report as being broken. The 2 companies cited here allegedly started operating without these approvals and have not obtained these approvals until today. On 11 April 2007 the Deputy Minister of Environment in Jakarta instructed both to stop all activities in the fields until EIA Procedures are completed. A list of shortcomings of the EIA studies provided in the report.</p> <p>Answer: We express concern that local regulating authorities, with regards to Environmental Impact Assessments, sometimes require companies to utilize contractors or consultants that often lack experience and capacity and are not timely. We acknowledge that this leads to EIA's being poorly integrated into the decision making process.</p> <p>Looking ahead, in so far as the EIA process is concerned, we will re-appraise the list of accredited EIA consultants and select consultants that provide us confidence that they will practice due diligence in their assessments. Furthermore, we will incorporate, where relevant and appropriate, by improving terms of reference - components of RSPO P&amp;C into the EIA standards, including those of biodiversity and HCVF assessments into all of our EIA studies.</p> <p>In addition to EIA studies, we have engaged an independent third-party to conduct separate HCVF assessments in PT WSP, PT BCP and PT ANI and the results incorporated into a comprehensive management plan before any further land clearing or planting takes place.</p> <p>With regards to the environmental audits called for by the Ministry of Environment in Jakarta, we have duly complied and have completed environmental audits in the two companies; the audit reports have been submitted to the Department of Environment for approval.</p>
WIL-04	<p>P&amp;C Criterion 7.7 "Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in ASEAN guidelines or other regional best practice."</p> <p><b>Grievance raised: PT Wilmar Sambas Plantation and PT Buluh Cawang Plantation used fires in land clearing operations.</b></p> <p>Substantive argument: PT Wilmar Sambas Plantation and PT Buluh Cawang Plantation are/were subject to legal action by Indonesian authorities for intentional and systematic burning with the purpose of clearing land for plantation development. Reference is made to the report <i>Policy, Practice, Pride and Prejudice</i>, Chapter 3 for details and evidence supporting complaint, including information taken from legal proceedings against both companies.</p> <p>Answer: Wilmar enforces a strict zero burn policy in all our plantation operations. We categorically deny any usage of fire in land clearing operations.</p>



	<p>In legal proceedings, regarding the alleged use of fire to clear off land in PT WSP and PT BCP, the Singkawang Court of Justice, West Kalimantan pronounced Wilmar to be "not guilty" on all charges. The charge for "intentional action that cause environmental pollution and/or environmental damage" (systematic burning to clear land in preparation of planting), and charge for "unintentional action that cause environmental pollution and/or environmental damage" was found to be unproven and did not have a factual basis of proof."</p> <p>As indicated to the Compliance Advisor/Ombudsman (CAO) of the International Finance Corporation, we are willing to work with Civil Society Organizations as well as others to demonstrate, beyond a reasonable doubt, that we do not set fire or promote fire on our properties. We have also requested that Civil Society Organizations meet, together with external experts, to agree how to create a system that contributes towards the gathering of data necessary to review this important topic.</p>
WIL-05	<p>P&amp;C Criterion 7.3 "New plantings since November 2005 (which is the expected date of adoption of these criteria by the RSPO membership), have not replaced primary forest or any area containing one or more High Conservation Values."</p> <p><b>Grievance raised: The 3 companies have allegedly converted forests within their control since November 2005 without having conducted independent HCVF assessments.</b></p> <p>Substantive argument: By clearing forests after this RSPO 'cut off date' without having conducted High Conservation Value Forest assessments, Wilmar disqualifies the three areas for certification because it is actively destroying forests where such values may exist that may not be identifiable after deforestation. Reference is made to the report <i>Policy, Practice, Pride and Prejudice</i>, Chapter 6 for details and evidence supporting complaint. Section adds that other illegal activities are allegedly taking place, including illegal logging.</p> <p><b>Answer:</b></p> <p>Our merger with PPB Oil Palms was officially completed at the end of June 2007 and as part of merger integration, we performed a full review of internal policies and procedures with regard to corporate social responsibility and RSPO P&amp;C implementation.</p> <p>We deeply regret to discover, after having conducted investigations on the ground, that there were weaknesses in our system that overlooked the requirement of independent HCVF assessments in the 3 companies in question. The weaknesses were recognized in October 27. We have since taken corrective measures to improve them.</p> <p>Part of the remedial actions include placing a moratorium on all new plantation development activities in these three estates, until EIAs and HCVF assessments are duly completed and the results incorporated into system and management plans for these 3 companies. Taking a precautionary approach, only areas without HCV areas confirmed through a participatory engagement of stakeholders will be considered for development. For areas with any potential HCVs, all new land development shall cease until the full assessment has been duly completed and system and management plans taking into consideration the results of these assessments</p>

have been incorporated.

Furthermore, PPB Oil Palms, a subsidiary of Wilmar, is collaborating with WWF-Indonesia in conducting HCVF assessments for our plantations in Central Kalimantan, namely PT Prima Sawit Makmur, PT Mentaya Sawit Mas and PT Bumi Sawit Kencana. The Preliminary assessment has been duly completed and a survey on Orang Utan status and distribution was conducted by the WWF Indonesia team partnering with APAPI (Indonesia Primate Observers Association), Civil Society Organizations and universities in April 2007. The project is now in its final assessment stage. It will be followed by public consultation sessions. As a company, we are concerned about the Orang Utan and would like to put effort into their conservation if there is an appropriate opportunity to contribute.

For our plantations in West Kalimantan, including PT WSP, PT BCP and PT ANI, we have done a desktop study, identifying areas with possible HCVF potential based on maps and guidelines that were published in "Landscape High conservation value forest identification in West Kalimantan" by WWF Indonesia, May 2007. We are in the process of further verifying the HCVF potential in these areas by adopting similar concepts to what was done for our Central Kalimantan estates.

Apart from conducting HCVF assessments, the independent HCVF consultants we engage will also be tasked to train our key personnel on identifying, managing and enhancing these HCVF areas. The team will then ensure that the commitment of the value of conservation is filtered down to the general workforce and local communities. Through this process, we hope to safeguard the sanctity of these HCVF areas within our plantations. To ensure credibility to the process, we will engage third party and even civil society organizations to monitor the management of these identified HCV areas.

To further emphasise our commitment towards transparency, we are forming partnerships with environmental and social organizations who are members of RSPO to conduct these HCVF assessments and Social Impact Studies in all of our new developments in West Kalimantan and elsewhere.

PPB Oil Palms, a subsidiary of Wilmar, has signed an MOU with WWF Indonesia on conducting HCVF assessment in our projects in Central Kalimantan. And we will work along the same principles for our developments in West Kalimantan and other districts.

We have formed long-term partnerships with Civil Society Organizations such as SOS Rhino Borneo and Borneo Child Aid Society to render our support in their activities in our plantations in East Malaysia. We have been supporting SOS Rhino through our subsidiary PPB Oil Palms in the protection of the critically endangered Sumatran rhino since its inception in the Year 2000. We have also collaborated with Borneo Child Aid Society since early 2007 to give them strong support in their cause to provide free education to the migrant workers' children in our estates in Sabah.

For all future developments, we will work with the appointed EIA accredited consultants to incorporate – where relevant and appropriate - components of RSPO P&C into the EIA standards, including those of biodiversity and HCVF assessments.

	<p>In addition, we are currently reviewing all our Standard Operating Procedures (SOPs) to ensure that all RSPO criteria are strictly followed and incorporated into our practices.</p> <p>With regards to the allegations of Wilmar being involved in illegal logging, we categorically deny any involvement in such activities. The alleged illegal harvested rattan in PT ANI (Figure 15, Page 54) are actually bamboo sticks purchased by our neighbouring plantation for use as lining pegs in their new planting areas, and the sawn soft timber in PT BCP (Figure 10, Page 51) belongs to the local residents. We wish to reiterate that Wilmar is not involved in any logging nor illegal logging activities.</p>
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**Additional questions or requests we wish to raise for your attention and response include the following:**

Question No.	Details
Q-WIL01	<p>Clarify relationship of all 3 companies/operations cited in the report <i>Policy, Practice, Pride and Prejudice</i> by the complainants, i.e. PT Wilmar Sambas Plantation, PT Buluh Cawang Plantation, and PT Agro Nusa Investama to Wilmar International Ltd, as registered RSPO Ordinary Member.</p> <p>Answer: PT BCP and PT ANI are existing plantation subsidiaries while PT WSP is not owned by Wilmar but is under our management.</p>
Q-WIL04	<p>Update on status of legal proceedings associated with grievance, in particular on item WIL-04 relating to P&amp;C Criterion 7.7.</p> <p>Answer: In a report issued on 3<sup>rd</sup> July 2007, the complainants alleged that Wilmar had been clearing land by use of fire. The report further mentioned that the "Indonesian authorities were suing Wilmar for intentional and systematic illegal burning of forests to clear land for plantations."</p> <p><b>The Singkawang Court of Justice, West Kalimantan</b> has acquitted the two officers from plantations owned or managed by Wilmar of all charges. The judgment issued on 16 August 2007 was recently followed by a written judgment on the court's decision. The charge for "intentional action that caused environmental pollution and/or environmental damage" (systematic burning to clear land in preparation of planting), and charge for "unintentional action that caused environmental pollution and/or environmental damage" was found to be unproven and did not have a factual basis of proof.</p>

**Further elaboration on questions raised by the RSPO grievance panel not covered in re-constituted response:**

**How workers laid-off in areas where WIL withdraws operations will be treated and fairly compensated**

Wilmar is committed to enhancing the socio-economic development in local communities that welcome its presence. Key to this is providing employment to the locals, while ensuring they receive fair, consistent treatment and competitive remuneration.

As the self-imposed moratorium requires us to stop all planting and expansion activities, our first step is to suspend recruitment of additional workers. Most of the existing workers will be redeployed for various maintenance works such as weeding, manuring, cover crop planting, and pest and disease prevention.

This arrangement applies only to our permanent workers, not to the majority of the workers we use for field planting and for filling up soil in nurseries. The latter are hired as casual workers, are paid piece rates.

**How WIL will translate lessons learnt from this region into policies to be applied in all of WIL operations**

In line with the concept of continuous improvement (principle 8 of RSPO P&C), we have reviewed our activities and developed and implemented the following action plans to address the shortcomings:

- i) Land acquisition – for all future land acquisition, we will pay special attention to the potential presence of High Conservation Value Forest and Social Issues. Areas with the potential presence of these sensitive attributes will not be acquired unless they can be addressed satisfactorily.
- ii) To adopt a precautionary approach by conducting Environmental Impact Assessments, a full HCVF Assessment and Social Impact Assessment before any land development in the area commences.
- iii) To strictly observe all legal and statutory requirements before proceeding with land development

## **Action No. 7**

### **Details on what measures will be implemented within the Standard Operating Procedures that ensure strict following of the RSPO Principles & Criteria and a timeline for its full implementation**

The mechanism of implementation:

There are 3 levels of implementation to ensure progressive compliance of the implementation of RSPO Principles & Criteria across the group plantation and mills.

- i) Steering Council, comprising executive members of the Board of Directors, whose role it is to approve policies to meet sustainability principles and criteria, approve processes and provide necessary support in terms of resources and funding. The Steering Council will also drive, monitor and review the progress of implementation.
- ii) Operational Level – For every region, the plantation and mills has a management representative that is responsible for the full implementation of RSPO Principles and Criteria, including associated smallholders within an agreed time-line.
- iii) Internal Compliance/Audit. The sustainability department is responsible for guiding, monitoring compliance and co-ordinating efforts with regards to selection and engagement of credible external consultants. To ensure impartiality and independence, this department reports directly to the Company's Sustainability Steering Council.

To standardize the implementation of the RSPO Principles and Criteria, a system plan was developed, based on the National Interpretation for each country. The system plan defines the requirements for documentation, specific management actions and also clearly defines the role of the individuals involved in the process. Where appropriate, the system plan will be linked to a specific Standard Operating Procedure in order to address the requirement of each of the major and minor indicators stated in the national interpretation for each country of operation.