Astra Agro Lestari Tbk PT

Palm oil assessment

Total score: 36.6%

Latest update: October 2019
Next scheduled: October 2020

About this company: Astra Agro Lestari, established 1988, is an Indonesia-based company and a subsidiary of Astra International. Jardine Matheson Holdings is its ultimate parent entity. Astra Agro Lestari is engaged in oil palm cultivation and processing of fresh fruit bunches into crude palm oil and palm kernel. The company also operates rubber plantations and manufactures cooking oil, and through its subsidiaries operates a variety of other plantations such as tea and cocoa.

Parent company: Astra International (79.68%), Jardine Matheson Holdings Ltd

Landbank (oil palm): 290,961 hectares

Palm cultivation revenue: 99%

Market cap: 1,427,016,373 USD

Thomson Reuters ticker: AALIJK

Bloomberg ticker: AALI IJ

ISIN: ID1000066004

RSPO member? No

Other initiatives: Indonesian Sustainable Palm Oil (ISPO)

Activities: oil palm cultivation, milling, palm kernel crushing, palm oil refining

Locations: Indonesia (Aceh, Riau, Jambi, Central Kalimantan, East Kalimantan, South Kalimantan, West Sulawesi, Central Sulawesi)

Headquarters: Indonesia

Related companies: Joint venture with Kuala Lumpur Kepong Bhd

Parent website: https://www.astra.co.id/

Website: http://www.astra-agro.co.id/ | Sustainability report (2018)

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Parent website: https://www.astra.co.id/

Website: http://www.astra-agro.co.id/ | Sustainability report (2018)

Total: 72.5 / 198 36.6%
The company states in its 2018 sustainability report: “Astra Agro President Director is responsible for the development and evaluation of Sustainability Policy, assisted by Chief of Communication and Sustainability Officer (CCSO). In policy implementation, Vice President of Sustainability is responsible for reporting the progress of policy implementation periodically to the President Director and CCSO.”

**4. One or more members within the board of the company have responsibility for sustainability?**
The company states in its 2018 sustainability report: “Astra Agro President Director is responsible for the development and evaluation of Sustainability Policy”. The President Director is on the Board of Directors. Note that it is not clear whether any members of the Board of Commissioners have responsibility for sustainability.

**5. Percentage or number of women in senior management team?**

**6. Percentage or number of women board members?**

0 (0%) - The company does not directly report the number or percentage of women on its board. It lists members of the Board of Directors and Board of Commissioners, who all appear to be male. This information is undated.

**7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with palm oil production?**

**8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with palm oil production?**
The company engages with NGOs and government agencies regarding implementation of its sustainability policy and with local government to establish the Fire Care Community and on peat management. It has also worked with NGOs to identify and work with local indigenous communities. In its 2018 sustainability report the company also refers to collaboration with various research agencies and the Ministry of Environment and Forestry on peatland management.

**9. Sustainability report published within last two years?**

2018

**10. Reports through standardised reporting systems?**

GRI

**11. Verification report on compliance with POIG Charter, if a POIG member?**
This indicator is disabled as the company is not a POIG member.

**12. Climate risks assessment available?**

**13. Total land area managed/controlled for oil palm (ha)?**
The company reports planted area, but it is not clear if this covers all land under the company’s control for oil palm (e.g. unplanted area not given).
14. Total oil palm planted area (ha)?
290,900 - This figures includes both nucleus (224,336 ha) and plasma (66,556 ha) plantations. The company reports conflicting figures for planted area in different places. The website and one place in the annual report give a figure of 285,025 ha, but other places in the annual report give 290,892 ha and 290,900 ha.

15. Plasma/scheme smallholders planted area (ha)?
66,556 - Contradictory figures are given in different places. In one place in the 2018 annual report 66,556 ha is reported, in another 66,394 ha. On the website, the company states a "smallholder plantation area" of over 266,000 ha, and it is not clear what kind of smallholders this refers to.

16. Unplanted (areas designated for future planting) (ha)?
X 0 / 1 No source

17. Conservation set-aside area, including HCV area (ha)?
The company refers to some areas where it has undertaken rehabilitation of riparian and mangrove areas, but a total is not possible to calculate and it is clear these do not cover all the company's conservation and set-aside land.

18. Area for infrastructure (ha)?
X 0 / 1 No source

19. Maps of estates/management units?
Some concession boundaries are available through GF - there are 10 concessions listed under Astra Agro Lestari and 32 concessions under the parent company, Astra International. However, it is unclear if this represents all the company's concessions.

20. Maps of scheme/plasma smallholders?
X 0 / 1 No source

21. Names and locations of all third-party supplying plantations?
X 0 / 1 No source

22. Number of company-owned mills?
31 - In its 2018 annual report and on its map on its website, the company states it has 31 mills. However, the sustainability progress reports give different figures for "internal" mills, which are assumed to be the company's own mills – the most recent of these reports was for 2019 Q1, and stated that the company has 80 mills in its supply chain, 15 of which are "internal". The total figure is therefore not clear.

23. Names and coordinates of company-owned mills?
The company gives 31 mill names and locations on its map on its website, but it is unclear if these are all of the company's mills – see indicator above. There are also 20 mills listed under the company on GF's Universal Mill List, and one under its Palm Oil Mill list.

24. Number (or percentage) of company-owned mills that source from company-owned plantations and/or third-party plantations?
X 0 / 1 No source

25. Total volumes (or percentages) sourced by company-owned mills that come from company-owned plantations and/or third-party plantations?
✓ 1 / 1 Source

26. Number of supplier mills?
65 - The total number is not clear, as reporting is inconsistent. The sustainability progress reports give different figures for "external" mills, which are assumed to be the company’s supplying mills – the most recent of these reports was for 2019 Q1, and stated that the company has 80 mills in its supply chain, 65 of which are "external". The report before this gives a figure of 36 "external". The 2018 sustainability report seems to report the company has 106 supplying mills.

27. Names and coordinates of all third-party supplying mills?  
   × 0 / 1  No source

28. Number (or percentage) of third-party supplier mills that source from their own plantations and/or third-party plantations?  
   × 0 / 1  No source

29. Total volumes (or percentages) sourced from third-party supplier mills that come from their own plantations and/or third-party plantations?  
   × 0 / 1  No source

30. Total volume (or percentage) sourced for refineries that comes from intermediary traders and/or refiners rather than directly from mills?  
   × 0 / 1  No source

31. Time-bound commitment to achieve 100% traceability to mill level?  
   ✔ 1 / 1  Source
   The company states it has achieved 100% traceability to mill, as of its Q1 2019 sustainability progress report.

32. Percentage of supply traceable to mill level?  
   100%  
   ✔ 1 / 2  Source

33. Time-bound commitment to achieve 100% traceability to plantation level?  
   0.5 / 1  Source
   The company commits to developing supply chain traceability to plantation level, but does not specify 100% traceability.

34. Percentage of fresh fruit bunches (FFB) from own mills traceable to plantation level?  
   0 / 2  Source
   The company has verified its FFB supply from its nucleus plantations but has not yet done so for its plasma plantations, and no overall traceability to plantation figure is reported.

35. Percentage of fresh fruit bunches (FFB) from supplier mills traceable to plantation level?  
   0 / 2  No source

36. Publishes traceability data at refinery level?  
   0.5 / 1  Source
   The company reports that its three refineries are 100% traceable to mill level, but does not report traceability to plantation level for refineries.

37. Publishes traceability data at crusher level?  
   × 0 / 1  No source

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> **Deforestation and biodiversity**

9 / 18 50%

21 media reports
<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>38. Commitment to zero deforestation or zero conversion of natural ecosystems?</td>
<td>✔</td>
<td>Source</td>
</tr>
<tr>
<td>39. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?</td>
<td>✔</td>
<td>Source</td>
</tr>
<tr>
<td>40. Criteria for defining deforestation?</td>
<td>☑</td>
<td>Source</td>
</tr>
<tr>
<td>The company specifies it will not develop on HCS or HCV areas, using the HCS Approach and the procedures outlined by the HCVRN. A cut-off date beyond which deforestation is not accepted is not specified.</td>
<td></td>
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</tr>
<tr>
<td>41. Evidence of monitoring deforestation?</td>
<td>☑</td>
<td>Source</td>
</tr>
<tr>
<td>42. Amount of illegal/non-compliant deforestation recorded in own operations?</td>
<td>✔</td>
<td>Source</td>
</tr>
<tr>
<td>0 - Through its 2018 sustainability report, and progress updates up to Q1 2019, the company reports no cases of deforestation were found through its monitoring in its own concessions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>43. Amount of illegal/non-compliant deforestation recorded in supplier operations?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>44. Commitment to restoration of non-compliant deforestation/conversion?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>45. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>46. Implementing a landscape or jurisdictional level approach?</td>
<td>☑</td>
<td>Source</td>
</tr>
<tr>
<td>47. Commitment to biodiversity conservation?</td>
<td>✔</td>
<td>Source</td>
</tr>
<tr>
<td>48. Commitment to biodiversity conservation applies to all suppliers?</td>
<td>✔</td>
<td>Source</td>
</tr>
<tr>
<td>49. Identified species of conservation concern, referencing international or national system of species classification?</td>
<td>☑</td>
<td>Source</td>
</tr>
<tr>
<td>50. Examples of species and/or habitat conservation management?</td>
<td>☑</td>
<td>Source</td>
</tr>
<tr>
<td>The company reports various restoration and rehabilitation activities, including in riparian areas and mangrove habitats.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>51. Commitment to no hunting or only sustainable hunting of species?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>The company states it prohibits the “hunting of rare, vulnerable, and critically endangered species”, but does not extend this to all species or specify only sustainable subsistence hunting allowed.</td>
<td></td>
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</tr>
<tr>
<td>52. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>Question</td>
<td>Score</td>
<td>Source</td>
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</tr>
<tr>
<td>53. Commitment to conduct High Conservation Value (HCV) assessments?</td>
<td>✅ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>54. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?</td>
<td>✅ 1 / 1</td>
<td></td>
</tr>
<tr>
<td>55. High Conservation Value (HCV) assessments for planting undertaken prior to January 2015, and associated management and monitoring plans?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>56. High Conservation Value (HCV) assessments for all estates planted since January 2015?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>57. High Conservation Value (HCV) management and monitoring plans for all estates planted since January 2015?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>58. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS)?</td>
<td>0.5 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>59. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS) applies to all suppliers?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>60. Satisfactory review of all High Conservation Value (HCV) assessments undertaken since January 2015 by the HCV ALS Quality Panel?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>61. Commitment to the High Carbon Stock (HCS) Approach?</td>
<td>✅ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>62. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?</td>
<td>✅ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>63. High Carbon Stock (HCS) assessments?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>64. Commitment to conduct social and environmental impact assessments (SEIAs)?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>65. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
<tr>
<td>66. Social and environmental impact assessments (SEIAs) undertaken, and associated management and monitoring plans?</td>
<td>❌ 0 / 1</td>
<td>No source</td>
</tr>
</tbody>
</table>
67. Commitment to no planting on peat of any depth?  
✓ 1 / 1  Source

68. Commitment to no planting on peat of any depth applies to all suppliers?  
✓ 1 / 1  Source

69. Implementation of commitment to no planting on peat of any depth?  
P 0.75 / 1  Source

70. Landbank or planted area on peat?  
× 0 / 1  No source

71. Commitment to best management practices for soils and peat?  
P 0.5 / 1  Source

The company commits to best management practices for existing plantations on peat, but a similar commitment for other soils could not be found.

72. Commitment to best management practices for soils and peat applies to all suppliers?  
P 0.75 / 2  Source

The company's commitment to best management practices for existing plantations on peat covers all suppliers, but a similar commitment for other soils could not be found.

73. Evidence of best management practices for soils and peat?  
P 0.75 / 2  Source

74. Commitment to zero burning?  
✓ 1 / 1  Source

75. Commitment to zero burning applies to all suppliers?  
✓ 1 / 1  Source

76. Evidence of fire monitoring and management?  
P 0.75 / 2  Source

77. Details/number of hotspots/fires in company estates?  
✓ 1 / 1  Source

0: The company reported in its Q1 2019 update that it detected no fires in the first three months of 2019. Details for other time periods are given in previous reports.

78. Details/number of hotspots/fires within surrounding landscape/smallholders?  
P 0.5 / 1  Source

The company states in its Q1-2 2018 update that there were fires in the surrounding areas, but exact number of fires is not provided. In the Q3-4 2018 update it states it responded to 69 fires in community lands, but it is not clear if this is the overall number of fires that occurred.

79. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?  
× 0 / 1  No source

80. Methodology used to calculate GHG emissions?
The company states it carried out GHG calculations at 29 subsidiaries, using ISPO, ISCC and IPCC calculations.

**81. Progress towards commitment to reduce GHG emissions intensity?**
The company reported average GHG emissions per subsidiary as 358 tons of CO2/ha in its 2017 sustainability report. In its 2018 annual report it states it reduced emissions by "5.5 tons of CO2-eq and sequestration emissions in the form of 15,95 tons of CO2-eq/Ha". As these metrics are different, progress between years cannot be directly calculated.

**82. Percentage of mills with methane capture (100%)?**
1 - The company reports it has a methane capture facility in South Kalimantan.

**83. GHG emissions intensity?**
358 - Tons CO2/ha. The company reported this as the average emissions per subsidiary in 2017. It is not clear whether this accounts for all of a subsidiary's operations, nor whether emissions from the company's own operations are included.

**84. GHG emissions from land use change?**
× 0 / 1 No source

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**Water, chemical and pest management**

13 media reports

**85. Time-bound commitment to improve water use intensity?**
× 0 / 1 No source

**86. Progress towards commitment on water use intensity?**
The company reports some water savings but these figures are not in intensity, and it is not clear if they are improving.

**87. Water use intensity?**
× 0 / 1 No source

**88. Time-bound commitment to improve water quality (BOD and COD)?**
× 0 / 1 No source

**89. Progress towards commitment on water quality (BOD and COD)?**
× 0 / 1 No source

**90. Treatment of palm oil mill effluent (POME) and/or palm oil refinery effluent (PORE)?**
The company reports treatment of POME but not PORE.

**91. Commitment to protect natural waterways through buffer zones?**
The company states that it conserves riparian ecosystems but it is not clear if this is in place across all operations.

**92. Implementation of commitment to protect natural waterways through buffer zones?**
The company reports some restoration on mangrove areas, and that an external partner has reviewed this restoration process. More detailed and comprehensive evidence of the company's riparian areas – such as maps of all riparian zones
in its operations – was not found

93. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?
The company states a commitment to “limit pesticide use” but does not have a commitment to reduce fertiliser use. It refers to minimising pesticide use through Integrated Pest Control techniques, but does not have a clear commitment to reduce the use of chemicals

94. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?
The company’s commitment on pesticide use applies to suppliers, but it does not have a clear commitment to reduce fertiliser use, or chemical use in general

95. Implementation of commitment to reduce chemical usage?
The company reports a reduction in the use of insecticides and rodenticides between 2017 and 2018 as part of its commitment to reduce its chemical use

96. Chemical usage per ha or list of chemicals used?

97. Commitment to no use of paraquat?

98. Commitment to no use of paraquat applies to all suppliers?

99. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?

100. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?

101. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?

102. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?

103. Integrated Pest Management (IPM) approach?

104. Commitment to human rights?
<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Yes/No</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>105</td>
<td>Commitment to human rights applies to all suppliers?</td>
<td>✓</td>
<td>Source</td>
</tr>
<tr>
<td>106</td>
<td>Progress on human rights commitment?</td>
<td>P 0.75</td>
<td>Source</td>
</tr>
<tr>
<td>107</td>
<td>Commitment to respect legal and customary land tenure rights?</td>
<td>✓</td>
<td>Source</td>
</tr>
<tr>
<td>108</td>
<td>Commitment to legal and customary land rights applies to all suppliers?</td>
<td>✓</td>
<td>Source</td>
</tr>
<tr>
<td>109</td>
<td>Details of process for addressing land conflicts available?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>110</td>
<td>Commitment to respect indigenous and local communities’ rights?</td>
<td>P 0.5</td>
<td>Source</td>
</tr>
<tr>
<td>111</td>
<td>Commitment to respect indigenous and local communities’ rights applies to all suppliers?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>112</td>
<td>Examples of local stakeholder engagement to prevent conflicts?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>113</td>
<td>Commitment to free, prior and informed consent (FPIC)?</td>
<td>✓</td>
<td>Source</td>
</tr>
<tr>
<td>114</td>
<td>Commitment to free, prior and informed consent (FPIC) applies to all suppliers?</td>
<td>✓</td>
<td>Source</td>
</tr>
<tr>
<td>115</td>
<td>Details of free, prior and informed consent (FPIC) process available?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>116</td>
<td>Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>117</td>
<td>Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced, applies to all suppliers?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>118</td>
<td>Commitment to mitigate impacts on food security?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>119</td>
<td>Commitment to mitigate impacts on food security applies to all suppliers?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>120</td>
<td>Progress on commitment to mitigate impacts on food security?</td>
<td>P 0.75</td>
<td>Source</td>
</tr>
</tbody>
</table>
them e.g. in cultivating crops

121. Commitment to provide essential community services and facilities?  
X 0 / 1  No source

122. Progress on commitment to provide essential community services and facilities?  
P 0.75 / 2  Source

123. Commitment to respect all workers' rights?  
✓ 1 / 1  Source

124. Commitment to respect all workers' rights applies to all suppliers?  
✓ 1 / 1  Source

125. Progress on commitment to respect all workers' rights?  
P 0.75 / 2  Source

126. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?  
X 0 / 1  Source

The company refers, in different places, to all of the Fundamental ILO Conventions except for the Right to Organise and Collective Bargaining

127. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?  
X 0 / 1  No source

Only the commitments regarding no forced labour and no child labour clearly apply to suppliers

128. Commitment to eliminate gender-related discrimination with regards to employment and occupation?  
X 0 / 1  No source

129. Commitment to eliminate gender-related discrimination with regards to employment and occupation applies to all suppliers?  
X 0 / 1  No source

130. Percentage or number of temporary employees?  
9,871 (21%) - Contract employees

131. Percentage or number of women employees?  
8,244 (17.5%)

132. Commitment to pay at least minimum wage?  
✓ 1 / 1  Source

133. Commitment to pay at least minimum wage applies to all suppliers?  
X 0 / 1  Source

The company does not specify whether its commitment on minimum wage applies to all suppliers

134. Progress on commitment to pay minimum wage?  
P 0.75 / 2  Source

135. Reporting of salary by gender?  
X 0 / 1  No source

136. Commitment to address occupational health and safety?
<table>
<thead>
<tr>
<th>Question</th>
<th>Source</th>
<th>Score</th>
<th>Requirement</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>137. Commitment to address occupational health and safety applies to all suppliers?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>138. Reduction of time lost due to work-based injuries?</td>
<td></td>
<td>P 0.5</td>
<td>0/1</td>
<td>Source</td>
</tr>
<tr>
<td>The company reported that in 2018 &quot;nine subsidiaries received the Zero Accident achievement award from the Government of the Republic of Indonesia&quot;, but it does not report a zero accident rate across all operations</td>
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<td>139. Time lost due to work-based injuries?</td>
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</tr>
<tr>
<td>140. Zero fatalities as a result of work-based accidents?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>141. Number of fatalities as a result of work-based accidents?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>142. Provision of personal protective equipment and related training?</td>
<td></td>
<td>P 0.75</td>
<td>0/1</td>
<td>Source</td>
</tr>
<tr>
<td>143. Member of the Roundtable on Sustainable Palm Oil (RSPO)?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>144. RSPO-certified within three years of joining the RSPO or by November 2010 for companies joining prior to finalisation of the RSPO certification systems in November 2007?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>145. Submitted most recent RSPO Annual Communication of Progress (ACOP)?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>146. Listed all countries and regions in which operates in most recent RSPO Annual Communication of Progress (ACOP)?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>147. Time-bound plan for achieving 100% RSPO certification of estates and mills within five years or achieved 100% RSPO-certification of estates?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>148. Percentage of area (ha) RSPO-certified?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>149. Percentage of scheme/plasma smallholders (ha) RSPO-certified?</td>
<td></td>
<td>×</td>
<td>0/1</td>
<td>No source</td>
</tr>
<tr>
<td>150. Percentage of mills RSPO-certified?</td>
<td>× 0 / 1 No source</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>-----------------------------------------</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>151. Time-bound plan for achieving 100% RSPO certification of scheme/plasma/associated smallholders and outgrowers within five years or target already achieved?</td>
<td>× 0 / 1 No source</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>152. Percentage of FFB supply (tonnes) from independent smallholders/outgrowers/third-party FFB suppliers that is RSPO-certified?</td>
<td>× 0 / 1 No source</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>153. Year expected to achieve 100% RSPO certification of all palm product processing facilities?</td>
<td>× 0 / 1 No source</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>154. Percentage of all palm oil and oil palm products handled/traded/processed (tonnes) that is RSPO-certified?</td>
<td>× 0 / 1 No source</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>155. Sells or processes/trades RSPO-certified palm oil through Segregated or Identity Preserved supply chains?</td>
<td>× 0 / 1 No source</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>156. Indonesia Sustainable Palm Oil (ISPO) certified (100%)?</th>
<th>P 0.75 / 1 Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Externally verified] The company reports it has 38 subsidiaries with ISPO certificates, and one certificate for independent smallholders</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>157. Malaysia Sustainable Palm Oil (MSPO) certified?</th>
<th>× 0 / 1 No source</th>
</tr>
</thead>
<tbody>
<tr>
<td>This indicator is disabled as the company does not operate in Malaysia</td>
<td></td>
</tr>
</tbody>
</table>

| 158. Certified under voluntary sustainability certification scheme (e.g. ISCC, SAS, RSB, etc.)? | × 0 / 1 No source |

### Smallholders and suppliers

| 6.5 / 16 40.6% | 4 media reports |

#### 159. Commitment to support smallholders?

| ✓ 1 / 1 Source |

#### 160. Programme to support scheme/plasma smallholders?

| P 0.75 / 1 Source |

The company reports it supports plasma smallholders by providing training on good cultivation practices, fertiliser assistance, facilitating transport, and helping them to achieve ISPO certification among others.

#### 161. Percentage of scheme/plasma smallholders involved in programme?

| P 0.5 / 1 Source |

The company clearly provides support to some scheme smallholders, but the percentage is not clear. In its 2018 sustainability report it stated 74,000 smallholders (a mix of scheme, KKPA and independent) were in its "partnership programs". In the Q1-2 2018 progress update, the company reported that the partnership programme covered 39,416 ha in June 2018, with a goal to reach 40,600 ha by the end of the year.
162. Programme to support independent smallholders/outgrowers?
The company supports independent smallholders by providing training on good cultivation practices, fertiliser assistance, facilitating transport, and helping them to achieve ISPO certification among others.

163. Percentage of independent smallholders/outgrowers involved in programme?
The company clearly provides support to some independent smallholders, but the percentage is not clear. In its 2018 sustainability report it stated 74,000 smallholders (a mix of scheme, KKPA and independent) were in its "partnership programs". In 2017 it reported it had a partnership with 34,677 independent smallholders, joined in 1,378 farmer groups, but it is unclear if all of them are being supported.

164. Process used to prioritise, assess and/or engage suppliers on compliance with company’s policy and/or legal requirements?

165. Percentage of suppliers assessed and/or engaged on compliance with company requirements?
The company states in its 2019 Q1 progress update that it assessed 80 mills and found 8 that were high-risk, and mentions another company identified separately as high-risk. It states for all of these that the allegations against these companies were untrue. It is therefore not clear whether they are still identified as high-risk, or whether these cover all suppliers identified as high-risk in total.

166. Time-bound plan to engage with all high-risk mills within three years?

167. Programme to support high-risk mills to become compliant with sourcing policies?

168. Regularly engages with a subset of high-risk mills?
The company provides examples of engaging with high-risk mills, but the frequency with which this is done is unclear.

169. Procedures in place to assess all own and third-party supplying palm oil mills for risk level?

170. Regularly assesses and categorises the risk level of all own and third-party supplying mills?
The company reports examples of identifying high-risk mills in its supply chain, but the frequency with which this is done is unclear.

171. Regularly reports the risk level of all own and third-party supplying mills identified in its supply chain?
The company reports examples of identifying high-risk mills in its supply chain, but the frequency with which this is done is unclear, and the risk level of all mills in its supply chain is not reported.

172. Suspension or exclusion criteria for suppliers?

173. Time-bound action plans (including Key Performance Indicators) for suppliers to be in compliance with palm oil sourcing commitments?

174. Proportion of direct and indirect supply that comes from palm oil plantations which are compliant with palm oil sourcing policies?
<table>
<thead>
<tr>
<th>Question</th>
<th>Rating</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>175. Commitment to ethical conduct and prohibition of corruption?</td>
<td>✔️ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>176. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?</td>
<td>✗ 0/1</td>
<td>No source</td>
</tr>
<tr>
<td>177. Progress on commitment to ethical conduct and prohibition of corruption?</td>
<td>✗ 0/2</td>
<td>No source</td>
</tr>
<tr>
<td>178. Disclosure of the company’s management approach to tax and payments to governments?</td>
<td>✗ 0/1</td>
<td>No source</td>
</tr>
<tr>
<td>179. Whistleblowing procedure?</td>
<td>⬜ 0.5/1</td>
<td>Source. The company states it allows for whistleblowing, but there is no clear description of the steps to be taken</td>
</tr>
<tr>
<td>180. Own grievance or complaints system open to all stakeholders?</td>
<td>✔️ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>181. Details of complaints and grievances disclosed?</td>
<td>⬜ 0.5/1</td>
<td>Source. The company reports the date, issue title, complainant, and status of the complaints, but details on actions taken could not be found. A login area is linked to, but at the time of assessment this did not lead to more information on the complaints</td>
</tr>
</tbody>
</table>