

Eagle High Plantations Tbk PT

Palm oil
assessment

Total score:

45.8%

Latest update: October 2019

Next scheduled: November 2020

About this company:	Indonesian producer Eagle High, established in 2000, is a subsidiary of the Rajawali Group. Eagle High is involved in oil palm cultivation and processing.
Parent company:	Rajawali Group (65.5%)
Landbank (oil palm)	210,511 hectares
Palm cultivation revenue:	8%
Market cap:	265,201,707 USD
Thomson Reuters ticker:	BWPT.JK
Bloomberg ticker:	BWPT IJ
ISIN:	ID1000113202
RSPO member?	Yes
Other initiatives:	Indonesian Sustainable Palm Oil (ISPO)
Activities:	Oil palm cultivation, milling
Locations:	Indonesia (West Sumatra, Jambi, West Kalimantan, Central Kalimantan, South Kalimantan, East Kalimantan, Central Sulawesi, South Sulawesi, West Papua and Papua)
Headquarters:	Indonesia
Related companies:	FGV sold its 37% stake in Eagle High Plantations to FELDA in 2016.
Parent website:	http://rajawali.com
Website:	http://eaglehighplantations.com Latest annual report (2018) Sustainability report (2018)

Total:	80.61 / 176	45.8%
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Sustainability policy and leadership

8.5 / 11 77.3%

⚠ 5 media reports



<input type="checkbox"/> 1. Sustainable palm oil policy or commitment for all its operations?	✓	1 / 1	Source
<input type="checkbox"/> 2. Sustainable palm oil policy or commitment applies to all suppliers?	✗	0 / 1	
<input type="checkbox"/> 3. High-level position of responsibility for sustainability? Head - Sustainability.	✓	1 / 1	Source
<input type="checkbox"/> 4. One or more members within the board of the company have responsibility for sustainability?	✓	1 / 1	Source

Director of Sustainability.			
<input type="checkbox"/> 5. Percentage or number of women in senior management team? 5 (0.06%)	✓	1 / 1	Source
<input type="checkbox"/> 6. Percentage or number of women board members? 0 (0%) - The company reported six male and no female board members in 2017.	✓	1 / 1	Source
<input checked="" type="checkbox"/> 7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with palm oil production? One of the company's subsidiaries is a member of the Indonesia Global Compact Network (IGCN).	P	0.5 / 1	Source
<input checked="" type="checkbox"/> 8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with palm oil production? The company reports that it is working with an NGO and government organisations on Project Amour, an orangutan conservation project.	✓	1 / 1	Source
<input type="checkbox"/> 9. Sustainability report published within last two years?	✓	1 / 1	Source
<input type="checkbox"/> 10. Reports through standardised reporting systems? GRI.	✓	1 / 1	
<input checked="" type="checkbox"/> 11. Verification report on compliance with POIG Charter, if a POIG member? This indicator is disabled as the company is not a POIG member.			
<input checked="" type="checkbox"/> 12. Climate risks assessment available?	✗	0 / 1	



> Landbank, maps and traceability

10 / 16 62.5%

3 media reports



<input type="checkbox"/> 13. Total land area managed/controlled for oil palm (ha)? 210,511	✓	1 / 1	Source
<input type="checkbox"/> 14. Total oil palm planted area (ha)? 126,286 - This figure excludes the scheme smallholder area.	✓	1 / 1	Source
<input type="checkbox"/> 15. Plasma/scheme smallholders planted area (ha)? 19,793 - This figure is reported in the company's 2018 ACOP. However, the company reports 24,000 ha managed under the plasma scheme in its 2018 Sustainability Report.	P	0.5 / 1	Source

<input type="checkbox"/> 16. Unplanted (areas designated for future planting) (ha)? 0	✓	1 / 1	Source
<input type="checkbox"/> 17. Conservation set-aside area, including HCV area (ha)? 64,432	✓	1 / 1	Source
<input type="checkbox"/> 18. Area for infrastructure (ha)?	✗	0 / 1	
<input type="checkbox"/> 19. Maps of estates/management units? The company states that it has uploaded maps representing all concessions in its 2018 ACOP.	✓	1 / 1	Source
<input type="checkbox"/> 20. Maps of scheme/plasma smallholders?	✗	0 / 1	
<input type="checkbox"/> 21. Names and locations of all third-party supplying plantations?	✗	0 / 1	
<input type="checkbox"/> 22. Number of company-owned mills? 9	✓	1 / 1	Source
<input type="checkbox"/> 23. Names and coordinates of company-owned mills?	✓	1 / 1	Source
<input type="checkbox"/> 24. Number (or percentage) of company-owned mills that source from company-owned plantations and/or third-party plantations?	✓	1 / 1	Source
<input type="checkbox"/> 25. Total volumes (or percentages) sourced by company-owned mills that come from company-owned plantations and/or third-party plantations?	✓	1 / 1	Source
<input type="checkbox"/> 26. Number of supplier mills? This indicator is disabled as the company does not source from supplier mills.			
<input type="checkbox"/> 27. Names and coordinates of all third-party supplying mills? This indicator is disabled as the company does not source from supplier mills.			
<input type="checkbox"/> 28. Number (or percentage) of third-party supplier mills that source from their own plantations and/or third-party plantations? This indicator is disabled as the company does not source from supplier mills.			
<input type="checkbox"/> 29. Total volumes (or percentages) sourced from third-party supplier mills that come from their own plantations and/or third-party plantations? This indicator is disabled as the company does not source from supplier mills.			
<input type="checkbox"/> 30. Total volume (or percentage) sourced for refineries that comes from intermediary traders and/or refiners rather than directly from mills?			

This indicator is disabled as the company has informed ZSL that it is not a refiner.

31. Time-bound commitment to achieve 100% traceability to mill level?

This indicator is disabled as the company does not source from supplier mills.

32. Percentage of supply traceable to mill level?

This indicator is disabled as the company does not source from supplier mills.

33. Time-bound commitment to achieve 100% traceability to plantation level?

The company commits to achieve 100% traceability to plantation for operations in Kalimantan, but this does not cover the full scope of the company's operations.

P 0.5 / 1 [Source](#)

34. Percentage of fresh fruit bunches (FFB) from own mills traceable to plantation level?

X 0 / 2

35. Percentage of fresh fruit bunches (FFB) from supplier mills traceable to plantation level?

This indicator is disabled as the company does not source from supplier mills.

36. Publishes traceability data at refinery level?

This indicator is disabled as the company has informed ZSL that it is not a refiner.

37. Publishes traceability data at crusher level?

This indicator is disabled as the company has informed ZSL that it does not own crushing facilities.



> Deforestation and biodiversity

6.5 / 18 36.1%

⚠ 10 media reports



38. Commitment to zero deforestation or zero conversion of natural ecosystems?

✓ 1 / 1 [Source](#)

39. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?

X 0 / 1

40. Criteria for defining deforestation?

The company specifies criteria for defining deforestation as HCV, HCS, and peat, but does not specify a cut-off date beyond which deforestation would not be accepted.

P 0.5 / 1 [Source](#)

41. Evidence of monitoring deforestation?

X 0 / 2

42. Amount of illegal/non-compliant deforestation recorded in own operations?

X 0 / 1

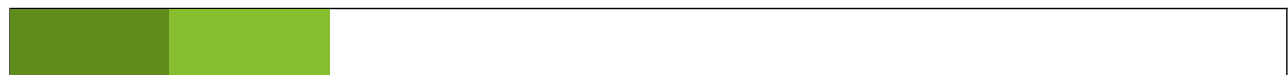
	✘	0 / 1
■ 43. Amount of illegal/non-compliant deforestation recorded in supplier operations?	✘	0 / 1
■ 44. Commitment to restoration of non-compliant deforestation/conversion?	✘	0 / 1
■ 45. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?	✘	0 / 1
■ 46. Implementing a landscape or jurisdictional level approach? The company states that two wildlife conservation projects with subsidiaries and local communities demonstrates its commitment to the landscape approach, but only provides limited details. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓	1 / 2 Source
■ 47. Commitment to biodiversity conservation?	✓	1 / 1 Source
■ 48. Commitment to biodiversity conservation applies to all suppliers?	✘	0 / 1
■ 49. Identified species of conservation concern, referencing international or national system of species classification? The company reports the IUCN status of several species found within its operational area. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓	1 / 2 Source
■ 50. Examples of species and/or habitat conservation management? The company refers to two conservation projects, one involving setting up patrols to protect, monitor and manage an HCV area where orangutan nests have been found, the other conserving the wetland habitat of the proboscis monkey. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓	1 / 1 Source
■ 51. Commitment to no hunting or only sustainable hunting of species?	✓	1 / 1 Source
■ 52. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?	✘	0 / 1



> HCV, HCS and impact assessments

5 / 25 / 14 37.5%

⚠ 2 media reports



■ 53. Commitment to conduct High Conservation Value (HCV) assessments?	✓	1 / 1 Source
■ 54. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?	✘	0 / 1
■ 55. High Conservation Value (HCV) assessments for planting undertaken prior to January 2015, and associated management and monitoring plans?	✘	0 / 1

<p>56. High Conservation Value (HCV) assessments for all estates planted since January 2015? The company reported planting 1,571 ha in its 2015 ACOP, but no HCV assessments corresponding to this could be found. It also reports having undertaken HCV assessments but no reports could be found.</p>	<p>✗ 0 / 1 Source</p>
<p>57. High Conservation Value (HCV) management and monitoring plans for all estates planted since January 2015?</p>	<p>✗ 0 / 1</p>
<p>58. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS)? The company does not have an explicit commitment itself, but commits under the RSPO New Planting Procedures (NPP) as an RSPO member.</p>	<p>P 0.5 / 1 Source</p>
<p>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?</p>	<p>✗ 0 / 1</p>
<p>60. Satisfactory review of all High Conservation Value (HCV) assessments undertaken since January 2015 by the HCV ALS Quality Panel?</p>	<p>✗ 0 / 1</p>
<p>61. Commitment to the High Carbon Stock (HCS) Approach?</p>	<p>✓ 1 / 1 Source</p>
<p>62. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?</p>	<p>✗ 0 / 1</p>
<p>63. High Carbon Stock (HCS) assessments?</p>	<p>✓ 1 / 1 Source</p>
<p>64. Commitment to conduct social and environmental impact assessments (SEIAs)?</p>	<p>✓ 1 / 1 Source</p>
<p>65. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?</p>	<p>✗ 0 / 1</p>
<p>66. Social and environmental impact assessments (SEIAs) undertaken, and associated management and monitoring plans? [Externally verified] A brief summary of an EIA is available in an HCS summary report.</p>	<p>P 0.75 / 1 Source</p>



> Peat, fire and GHG emissions

85 / 20 42.5%

⚠ 1 media report



<p>67. Commitment to no planting on peat of any depth?</p>	<p>✓ 1 / 1 Source</p>
<p>68. Commitment to no planting on peat of any depth applies to all suppliers?</p>	

		✗	0 / 1
<p>69. Implementation of commitment to no planting on peat of any depth?</p>		P	0.75 / 1 Source
<p>70. Landbank or planted area on peat? 20,334 - Figure reported for area planted on peatland (ha) in 2018.</p>		✓	1 / 1 Source
<p>71. Commitment to best management practices for soils and peat?</p>		✓	1 / 1 Source
<p>72. Commitment to best management practices for soils and peat applies to all suppliers?</p>		✗	0 / 1
<p>73. Evidence of best management practices for soils and peat? The company reports managing water levels for peat, and application of liquid and solid palm oil waste as a supplement and mulch to retain moisture. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>		✓	1 / 2 Source
<p>74. Commitment to zero burning?</p>		✓	1 / 1 Source
<p>75. Commitment to zero burning applies to all suppliers?</p>		✗	0 / 1
<p>76. Evidence of fire monitoring and management? The company reports monitoring and managing fires by daily patrols, monitoring from a monitoring tower, conducting fire prevention activities with local authorities and fire brigade, conducting emergency response training, and responding to fire outbreak to successfully extinguish fire between July-September 2018.</p>		P	0.75 / 2 Source
<p>77. Details/number of hotspots/fires in company estates? The company reports that fires occurred in one operational area between July-September 2018, but further details are not provided.</p>		P	0.5 / 1 Source
<p>78. Details/number of hotspots/fires within surrounding landscape/smallholders?</p>		✗	0 / 1
<p>79. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity? The company states it is committed to actively pursue opportunities to reduce its greenhouse gas emissions, but does not provide details and it is not a time-bound commitment.</p>		✗	0 / 1 Source
<p>80. Methodology used to calculate GHG emissions? The company states it "applies monitoring system based on the ISPO calculator adapted from the EU Directive calculator. The baseline year for calculating carbon emissions is 2016 which uses the ISPO GHG calculation tools."</p>		✓	1 / 1 Source
<p>81. Progress towards commitment to reduce GHG emissions intensity? The company reports emissions but not in intensity from POME, Scope 1 and Scope 2 for some of its subsidiaries, but not all show an improvement and this does not cover the full scope of the company's operations.</p>		✗	0 / 1 Source
<p>82. Percentage of mills with methane capture (100%)?</p>		✗	0 / 1 Source

The company reports it is planning to construct a biogas plant but does not report that this is operational.

P 0.5 / 1 [Source](#)

83. GHG emissions intensity?

The company reports emissions but not in intensity from POME, Scope 1 and Scope 2 for some of its subsidiaries, but this does not cover the full scope of the company's operations.

X 0 / 1

84. GHG emissions from land use change?



> **Water, chemical and pest management**

7.75 / 22 35.2%

7 media reports



X 0 / 1 [Source](#)

85. Time-bound commitment to improve water use intensity?

The company states it is committed to improving the intensity of water use, but does not refer to a time-bound target.

X 0 / 1 [Source](#)

86. Progress towards commitment on water use intensity?

The company reports some water use figures, but these are not reported in water use intensity, are not improving, and do not cover all operations.

X 0 / 1 [Source](#)

87. Water use intensity?

The company reports some water use figures, but these are not reported in water use intensity, are not improving, and do not cover all operations.

✓ 1 / 1 [Source](#)

88. Time-bound commitment to improve water quality (BOD and COD)?

The company states it is committed to improving the quality of processed wastewater in its operations and ensuring the quality of processed wastewater complies with the quality standards set by the government.

P 0.5 / 1 [Source](#)

89. Progress towards commitment on water quality (BOD and COD)?

The company reports improving figures for BOD that are within legal limits for some of its operations.

P 0.75 / 1 [Source](#)

90. Treatment of palm oil mill effluent (POME) and/or palm oil refinery effluent (PORE)?

The company reports it treats POME.

✓ 1 / 1 [Source](#)

91. Commitment to protect natural waterways through buffer zones?

✓ 1 / 2 [Source](#)

92. Implementation of commitment to protect natural waterways through buffer zones?

Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.

✓ 1 / 1 [Source](#)

93. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?

X 0 / 1

94. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies

to all suppliers?			
95. Implementation of commitment to reduce chemical usage?	Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓	1 / 2 Source
96. Chemical usage per ha or list of chemicals used?	The company provides a list of chemicals and pesticides used, but it is not clear whether this covers all operations as details are only provided for some subsidiaries.	P	0.5 / 1 Source
97. Commitment to no use of paraquat?	The company states it has a commitment to stop using paraquat, but does not specify that it has stopped, or provide a time-bound plan for phasing out use of paraquat.	✗	0 / 1 Source
98. Commitment to no use of paraquat applies to all suppliers?		✗	0 / 1
99. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?	The company states it has a commitment to stop using WHO Class 1A and 1B pesticides, but does not specify that it has stopped, or provide a time-bound plan for phasing out their use.	✗	0 / 1 Source
100. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?		✗	0 / 1
101. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?	The company states it has a commitment to stop using chemicals listed under the Stockholm and Rotterdam Conventions, but does not specify that it has stopped, or provide a time-bound plan for phasing out their use.	✗	0 / 1 Source
102. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?		✗	0 / 1
103. Integrated Pest Management (IPM) approach?	The company reports a range of natural pest control used for a number of pests, including using barn owls to control rats; pheromone application to control scarab beetle; using manual control, light traps and planting host plants for predatory species to control fire caterpillars. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓	1 / 2 Source



> Community, land and labour rights

22 / 25 / 46 48.4%

⚠ 7 media reports



104. Commitment to human rights? ✓ 1 / 1 [Source](#)

<p>105. Commitment to human rights applies to all suppliers?</p>	<p>✗</p>	<p>0 / 1</p>
<p>106. Progress on human rights commitment? The company states it conducts training on human rights but no further details are provided. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	<p>✓</p>	<p>1 / 2 Source</p>
<p>107. Commitment to respect legal and customary land tenure rights?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p>108. Commitment to legal and customary land rights applies to all suppliers?</p>	<p>✗</p>	<p>0 / 1</p>
<p>109. Details of process for addressing land conflicts available?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p>110. Commitment to respect indigenous and local communities' rights? The company states that it respects the right of its indigenous and local communities but does not reference the UN Declaration on the Rights of Indigenous Peoples or ILO 169.</p>	<p>P</p>	<p>0.5 / 1 Source</p>
<p>111. Commitment to indigenous and local communities' rights applies to all suppliers?</p>	<p>✗</p>	<p>0 / 1</p>
<p>112. Examples of local stakeholder engagement to prevent conflicts? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	<p>✓</p>	<p>1 / 2 Source</p>
<p>113. Commitment to free, prior and informed consent (FPIC)?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p>114. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?</p>	<p>✗</p>	<p>0 / 1</p>
<p>115. Details of free, prior and informed consent (FPIC) process available?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p>116. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p>117. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced, applies to all suppliers?</p>	<p>✗</p>	<p>0 / 1</p>
<p>118. Commitment to mitigate impacts on food security?</p>	<p>✗</p>	<p>0 / 1</p>
<p>119. Commitment to mitigate impacts on food security applies to all suppliers?</p>	<p>✗</p>	<p>0 / 1</p>
<p>120. Progress on commitment to mitigate impacts on food security? The company reports several examples including cultivation of horticulture crops, livestock, freshwater fisheries.</p>	<p>P</p>	<p>0.75 / 2 Source</p>

<p>121. Commitment to provide essential community services and facilities?</p>	✓	1 / 1	Source
<p>122. Progress on commitment to provide essential community services and facilities? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	✓	1 / 2	Source
<p>123. Commitment to respect all workers' rights? The company refers to protecting the rights of all employees, but does not explicitly state workers' or labour rights, or that this applies to both permanent and temporary employees.</p>	✓	1 / 1	Source
<p>124. Commitment to respect all workers' rights applies to all suppliers?</p>	✗	0 / 1	
<p>125. Progress on commitment to respect all workers' rights? Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	✓	1 / 2	Source
<p>126. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?</p>	✓	1 / 1	Source
<p>127. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?</p>	✗	0 / 1	
<p>128. Commitment to eliminate gender-related discrimination with regards to employment and occupation?</p>	✓	1 / 1	Source
<p>129. Commitment to eliminate gender-related discrimination with regards to employment and occupation applies to all suppliers?</p>	✗	0 / 1	
<p>130. Percentage or number of temporary employees? 16,837 (67%) - This figure includes contract and daily employees.</p>	✓	1 / 1	Source
<p>131. Percentage or number of women employees? 1,012 (12%)</p>	✓	1 / 1	Source
<p>132. Commitment to pay at least minimum wage?</p>	✓	1 / 1	Source
<p>133. Commitment to pay at least minimum wage applies to all suppliers?</p>	✗	0 / 1	
<p>134. Progress on commitment to pay minimum wage? The company states that all employees receive the provincial minimum wage in its 2018 sustainability report, and provides evidence of minimum wage paid and provincial minimum wages in its 2017 sustainability report. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	✓	1 / 2	Source
<p>135. Reporting of salary by gender?</p>	✗	0 / 1	

<input checked="" type="checkbox"/> 136. Commitment to address occupational health and safety?	✓	1 / 1	Source
<input checked="" type="checkbox"/> 137. Commitment to address occupational health and safety applies to all suppliers?	✗	0 / 1	
<input checked="" type="checkbox"/> 138. Reduction of time lost due to work-based injuries?	✗	0 / 1	
<input type="checkbox"/> 139. Time lost due to work-based injuries?	✗	0 / 1	
<input checked="" type="checkbox"/> 140. Zero fatalities as a result of work-based accidents? The company reports three fatalities in 2018, but this does not cover the full scope of the company's operations.	✗	0 / 1	Source
<input type="checkbox"/> 141. Number of fatalities as a result of work-based accidents? 3	✓	1 / 1	Source
<input checked="" type="checkbox"/> 142. Provision of personal protective equipment and related training? The company provides examples of tasks for which it provides PPE and facilitates training: spraying oil palm trees with chemicals, harvesting FFB, operating heavy equipments, conducting activities in palm oil mill production processes. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.	✓	1 / 2	Source



> Certification standards

486 / 13 37.4%

⚠ 6 media reports



<input checked="" type="checkbox"/> 143. Member of the Roundtable on Sustainable Palm Oil (RSPO)? 2,008	✓	1 / 1	Source
<input checked="" type="checkbox"/> 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? The company achieved its first certification in 2019.	✗	0 / 1	Source
<input type="checkbox"/> 145. Submitted most recent RSPO Annual Communication of Progress (ACOP)?	✓	1 / 1	Source
<input type="checkbox"/> 146. Listed all countries and regions in which operates in most recent RSPO Annual Communication of Progress (ACOP)? The company reports operational area in Sulawesi which is not stated in its 2018 ACOP, however this area is not yet operational.	✓	1 / 1	Source
<input checked="" type="checkbox"/> 147. Time-bound plan for achieving 100% RSPO certification of estates and mills within five years or achieved 100% RSPO-certification of estates? 2023	✓	1 / 1	Source

<p>148. Percentage of area (ha) RSPO-certified? 8,262 - This figure relates to the company's certified area dated 2019, but a total landbank figure dated 2019 is not available in company reporting. A figure for "Plantations – total hectares" is available in a data appendix on the company website, but it is not clear that this refers to total landbank. The company reported 0 ha certified in the 2018 ACOP.</p>	<p>✗ 0 / 1 Source</p>
<p>149. Percentage of scheme/plasma smallholders (ha) RSPO-certified? 0 (0%)</p>	<p>✗ 0 / 1 Source</p>
<p>150. Percentage of mills RSPO-certified? 1 (11%)</p>	<p>P 0.11 / 1 Source</p>
<p>151. Time-bound plan for achieving 100% RSPO certification of scheme/plasma/ associated smallholders and outgrowers within five years or target already achieved? 2026 - The company states 2026 in its 2018 ACOP, and 2025 in its 2018 Sustainability Report.</p>	<p>✗ 0 / 1 Source</p>
<p>152. Percentage of FFB supply (tonnes) from independent smallholders/ outgrowers/third-party FFB suppliers that is RSPO-certified? 0</p>	<p>✗ 0 / 1 Source</p>
<p>153. Year expected to achieve 100% RSPO certification of all palm product processing facilities? This indicator is disabled as the company has informed ZSL that it does not own processing facilities.</p>	
<p>154. Percentage of all palm oil and oil palm products handled/traded/ processed (tonnes) that is RSPO-certified? This indicator is disabled as the company has informed ZSL that it does not own processing facilities.</p>	
<p>155. Sells or processes/trades RSPO-certified palm oil through Segregated or Identity Preserved supply chains? 0</p>	<p>✗ 0 / 1 Source</p>
<p>156. Indonesia Sustainable Palm Oil (ISPO) certified (100%)? [Externally verified] The company reports five subsidiaries with ISPO certification, but only one certificate could be found via the ISPO website.</p>	<p>P 0.75 / 1 Source</p>
<p>157. Malaysia Sustainable Palm Oil (MSPO) certified? This indicator is disabled as the company does not operate in Malaysia.</p>	
<p>158. Certified under voluntary sustainability certification scheme (e.g. ISCC, SAS, RSB, etc.)?</p>	<p>✗ 0 / 1</p>



> Smallholders and suppliers

35 / 8 43.8%

⚠ 2 media reports



<p>159. Commitment to support smallholders?</p>	<p>✓ 1 / 1 Source</p>
<p>160. Programme to support scheme/plasma smallholders? The company reports it supports plasma smallholders including to increase yields and productivity, providing health and safety training, financial management and good agricultural practices. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>	<p>✓ 1 / 1 Source</p>
<p>161. Percentage of scheme/plasma smallholders involved in programme? 12,000 - The company reports it has established a strategic partnership with 12,000 plasma farmers but the percentage of smallholders supported by the company is unclear.</p>	<p>P 0.5 / 1 Source</p>
<p>162. Programme to support independent smallholders/outgrowers? This indicator is disabled as the company has informed ZSL that it does not source from independent smallholders or outgrowers.</p>	
<p>163. Percentage of independent smallholders/outgrowers involved in programme? This indicator is disabled as the company has informed ZSL that it does not source from independent smallholders or outgrowers.</p>	
<p>164. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements? The company states it records all suppliers to ensure compliance "with other needs and requirements" and states it does not buy FFB from suppliers who have violated laws relating to encroachment on forests, conservation areas, nature reserves and other prohibited areas, and regularly assesses suppliers, but does not provide further details.</p>	<p>P 0.5 / 1 Source</p>
<p>165. Percentage of suppliers assessed and/or engaged on compliance with company requirements?</p>	<p>✗ 0 / 1</p>
<p>166. Time-bound plan to engage with all high-risk mills within three years? This indicator is disabled as the company does not source from mills.</p>	
<p>167. Programme to support high-risk mills to become compliant with sourcing policies? This indicator is disabled as the company does not source from mills.</p>	
<p>168. Regularly engages with a subset of high-risk mills? This indicator is disabled as the company does not source from mills.</p>	
<p>169. Procedures in place to assess all own and third-party supplying palm oil mills for risk level? This indicator is disabled as the company does not source from mills.</p>	
<p>170. Regularly assesses and categorises the risk level of all own and third-party supplying mills? This indicator is disabled as the company does not source from mills.</p>	
<p>171. Regularly reports the risk level of all own and third-party supplying mills identified in its supply chain? This indicator is disabled as the company does not source from mills.</p>	

	P	0.5 / 1	Source
<p>172. Suspension or exclusion criteria for suppliers?</p> <p>The company states it records all suppliers to ensure compliance "with other needs and requirements" and states it does not buy FFB from suppliers who have violated laws relating to encroachment on forests, conservation areas, nature reserves and other prohibited areas, and regularly assesses suppliers, but does not provide further details.</p>			
	X	0 / 1	
<p>173. Time-bound action plans (including Key Performance Indicators) for suppliers to be in compliance with palm oil sourcing commitments?</p>			
	X	0 / 1	
<p>174. Proportion of direct and indirect supply that comes from palm oil plantations which are compliant with palm oil sourcing policies?</p>			



> Governance and grievances

35 / 8 43.8%

1 media report



	✓	1 / 1	Source
<p>175. Commitment to ethical conduct and prohibition of corruption?</p>			
	X	0 / 1	
<p>176. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?</p>			
	✓	1 / 2	Source
<p>177. Progress on commitment to ethical conduct and prohibition of corruption?</p> <p>The company reports it has disseminated its code of ethics to 46% of total employees, and code of ethics training has been conducted in all regions except Sumatra. Points for external verification have been awarded on the basis of the company's RSPO certified landbank/volume.</p>			
	X	0 / 1	
<p>178. Disclosure of the company's management approach to tax and payments to governments?</p>			
	✓	1 / 1	Source
<p>179. Whistleblowing procedure?</p>			
	P	0.5 / 1	Source
<p>180. Own grievance or complaints system open to all stakeholders?</p> <p>The company states it has a community/environment complaint mechanism with a standard operating procedure for complaint handling but no further details given and it is not clear who the system is open to or how to access it.</p>			
	X	0 / 1	
<p>181. Details of complaints and grievances disclosed?</p>			