

# WTK Holdings

Total score:

18.1%

Latest update: July 2020

Next scheduled: July 2021

## About this company:

Founded in 1940 and headquartered in Malaysia, WTKGroup owns forestry operations in Malaysia, Indonesia and Papua New Guinea. It is involved in timber production, processing, manufacturing, trading and distribution. WTK Group also operates in a range of other business sectors including tourism, hotels and shipping, though its palm oil operations are not yet assessed on SPOTT.

**Landbank** 860,000 hectares

**Market cap:** 46,994,224 USD

**Thomson Reuters ticker:** WTKH.KL

**Bloomberg ticker:** WTKH:MK

**ISIN:** MYL424300001

**Activities:** Timber production; Pulpwood production; Timber processing and manufacturing; Trading and distribution

**Locations:** Sarawak (Borneo)

**Headquarters:** Malaysia

**Website:** [http://wtkholdings.com/Latest annual report \(2018\)](http://wtkholdings.com/Latest%20annual%20report%20(2018))

<b>Total:</b>	<b>31.75 / 175</b>	<b>18.1%</b>
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## > Sustainability policy and leadership

6 / 12 50%

 1 media report



1. Sustainable forestry policy or commitment for all its operations?

✓ 1 / 1 [Source](#)

2. Sustainable forestry policy or commitment applies to all suppliers?

P 0.5 / 1 [Source](#)

The company states that as part of its environmental commitment, it 'encourage [suppliers] to adopt and pursue relevant certifications in support of our sustainability commitments'. However there is no clear policy stating that the company's sustainability commitments apply to all third-party suppliers.

3. High-level position of responsibility for sustainability?

✓ 1 / 1 [Source](#)

The company reports a sustainability governance structure, comprised of representatives from key functions including operations, planning, social, business and finance.

4. One or more members within the board of the company have responsibility for sustainability?

✓ 1 / 1 [Source](#)

The Managing Director of the company holds responsibility in managing sustainability within the company.

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

P 0.5 / 1 [Source](#)

0 - Gender balance not directly reported, but calculated from profiles of senior management team.			
<input type="checkbox"/> 6. Percentage or number of women board members?	2 - Gender balance not directly reported, but calculated from profiles of board members.	P	0.5 / 1 <a href="#">Source</a>
<input type="checkbox"/> 7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production?		X	0 / 1
<input type="checkbox"/> 8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production?	The company reports stakeholder engagement on having discussed various sustainability issues, but does not report actions taken (or planned) to reduce negative environmental or social outcomes.	P	0.5 / 1 <a href="#">Source</a>
<input type="checkbox"/> 9. Sustainability report published within last two years?		✓	1 / 1
<input type="checkbox"/> 10. Reports through standardised reporting systems?		X	0 / 1
<input type="checkbox"/> 11. Climate risks assessment available?		X	0 / 1
<input type="checkbox"/> 12. Natural capital assessment available?		X	0 / 1



### > Landbank, maps and traceability

6 / 26 23.1%			
2 media reports			
<input type="checkbox"/> 13. Lists countries and operations?	The company states that all its timber production and processing, from natural forest and plantations, occurs in Sarawak (Malaysia).	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 14. Lists countries sourcing from?	The company states that all its timber production and processing, from natural forest and plantations, occurs in Sarawak (Malaysia).	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 15. Total area of natural forest designated for wood/wood fibre production (ha)?	Website for whole company group states 850,000 ha in Sarawak, however the information is undated and unavailable on the company's own website.	X	0 / 1 <a href="#">Source</a>
<input type="checkbox"/> 16. Total area of forest plantation (ha)?	8,700	✓	1 / 1 <a href="#">Source</a>
<input type="checkbox"/> 17. Area of plantation/natural forest within outgrower schemes (ha)?		X	0 / 1

<p><input type="checkbox"/> <b>18. Unplanted (areas designated for future development as plantation forest) (ha)?</b> Contradictory figures are published for the same time period.</p>	P	0.5 / 1
<p><input type="checkbox"/> <b>19. Conservation set-aside area, including HCV area (ha)?</b></p>	✗	0 / 1
<p><input type="checkbox"/> <b>20. Area of Intact Forest Landscape (ha)?</b></p>	✗	0 / 1
<p><input type="checkbox"/> <b>21. Number of Forest Management Units (FMUs)?</b> Global Forest Watch data includes 10 wood fibre concessions, but it is unclear whether this covers all of the company's operations.</p>	P	0.5 / 1 <a href="#">Source</a>
<p><input type="checkbox"/> <b>22. Maps of forest management units (FMUs)?</b> Global Forest Watch data includes 10 wood fibre concessions, but it is unclear whether this covers all of the company's operations.</p>	P	0.5 / 1 <a href="#">Source</a>
<p><input type="checkbox"/> <b>23. Forest management plans available for all FMUs?</b></p>	✗	0 / 1
<p><input type="checkbox"/> <b>24. Monitoring of forest management plan implementation available?</b></p>	✗	0 / 1
<p><input type="checkbox"/> <b>25. Company has provided valid legal documents to Open Timber Portal on use right (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p><input type="checkbox"/> <b>26. Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p><input type="checkbox"/> <b>27. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p><input type="checkbox"/> <b>28. Names and locations of all third-party supplying FMUs?</b></p>	✗	0 / 1
<p><input type="checkbox"/> <b>29. Number of company owned sawmills?</b> 4 - The company included four sawmills within its list of properties in 2018.</p>	✓	1 / 1 <a href="#">Source</a>
<p><input type="checkbox"/> <b>30. Names and locations of company owned sawmills?</b> The company gives some details of sawmill locations, but these are insufficient to generate specific locations on Google maps.</p>	P	0.5 / 1 <a href="#">Source</a>

<input type="checkbox"/> 31. Number of company-owned pulp and paper mills?	✗	0 / 1
<input type="checkbox"/> 32. Names and locations of company-owned pulp and paper mills?	✗	0 / 1
<input type="checkbox"/> 33. Reports total volumes (or percentages) sourced by company-owned sawmills that come from company's own operations and/or third-parties?	✗	0 / 1
<input type="checkbox"/> 34. Reports total volumes (or percentages) sourced by company-owned pulp and paper mills that come from company's own operations and/or third-parties?	✗	0 / 1
<input type="checkbox"/> 35. Number of third party supplying mills?	✗	0 / 1
<input type="checkbox"/> 36. Names and locations of all third party supplying mills?	✗	0 / 1
<input type="checkbox"/> 37. Reports total volume (or percentages) sourced from third-party supplying mills that come from the supplying mills' own operations and/or third parties?	✗	0 / 1
<input type="checkbox"/> 38. Procedures to trace raw materials to country of harvest?	✗	0 / 1
<input type="checkbox"/> 39. Percentage of supply traceable to country of harvest?	✗	0 / 1
<input type="checkbox"/> 40. Procedures to trace raw materials to FMU level?	✗	0 / 1
<input type="checkbox"/> 41. Percentage of supply traceable to FMU level?	✗	0 / 1



## > Certification standards

1 / 9 11.1%

 4 media reports



42. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved? ✓ 1 / 1 [Source](#)  
 The company states that one of its license areas is Sarawak Timber Legality Verification System certified, as are three plywood mills. The company expects the remaining license areas to be STLVS certified by 2020.

43. Percentage area (ha) verified as being in legal compliance by a third party? ✗ 0 / 1  
 Area certified not given in percentage or ha.

44. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party? ✗ 0 / 1

<input type="checkbox"/> 45. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?	X	0 / 1
<input type="checkbox"/> 46. Percentage area (ha) FSC FM certified?	X	0 / 1
<input type="checkbox"/> 47. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?	X	0 / 1
<input type="checkbox"/> 48. Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas?	X	0 / 1
<input type="checkbox"/> 49. Commitment to source only wood/wood fibre that meets FSC Controlled Wood and/or PEFC Controversial Sources requirements?	X	0 / 1
<input type="checkbox"/> 50. Percentage area (ha) PEFC certified (excluding FSC certified area)?	X	0 / 1



## > Deforestation and biodiversity

3.5 / 22 15.9%

8 media reports



<input type="checkbox"/> 51. Commitment to zero deforestation or zero conversion of natural ecosystems?	X	0 / 1
<input type="checkbox"/> 52. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?	X	0 / 1
<input type="checkbox"/> 53. Criteria for defining deforestation?	X	0 / 1
<input type="checkbox"/> 54. Evidence of monitoring deforestation? The company speaks about assessing environmental impacts, but not specifically deforestation, methodology or monitoring or extent of area being monitored for deforestation.	X	0 / 1
<input type="checkbox"/> 55. Amount of illegal/non-compliant deforestation recorded?	X	0 / 1
<input type="checkbox"/> 56. Amount of illegal//non-compliant deforestation recorded in supplier operations?	X	0 / 1
<input type="checkbox"/> 57. Commitment to restoration of non-compliant deforestation/conversion?	X	0 / 1
<input type="checkbox"/> 58. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?	X	0 / 1

■ 59. Implementing a landscape or jurisdictional level approach?	✗	0 / 1
■ 60. Commitment to biodiversity conservation?	✓	1 / 1 <a href="#">Source</a>
■ 61. Commitment to biodiversity conservation applies to all suppliers?	✗	0 / 1
■ 62. Identified species of conservation concern, referencing international or national system of species classification? The company has identifies species of animals and plants classified as 'Totally Protected' and 'Protected' in Sarawak under the Wildlife Protection Ordinance 1998 found in its operations.	✓	1 / 1 <a href="#">Source</a>
■ 63. Examples of species and/or habitat conservation management? The company gives example of engaging with employees and contractors about species within operations, and putting up signs to indicate no hunting.	P	0.5 / 2 <a href="#">Source</a>
■ 64. Commitment to no hunting or only sustainable hunting of species?	✓	1 / 1 <a href="#">Source</a>
■ 65. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?	✗	0 / 1
■ 66. Commitment to protect forest areas from illegal activities?	✗	0 / 1 <a href="#">Source</a>
■ 67. Commitment to protect forest areas from illegal activities applies to all suppliers?	✗	0 / 1
■ 68. Evidence of protecting forest areas from illegal activities?	✗	0 / 2
■ 69. Commitment to no use of genetically modified organisms?	✗	0 / 1
■ 70. Commitment to no use of genetically modified organisms applies to all suppliers?	✗	0 / 1



### > HCV, HCS and impact assessments

2 / 10 20%

⚠ 2 media reports



■ 71. Commitment to conduct High Conservation Value (HCV) assessments?	✓	1 / 1 <a href="#">Source</a>
■ 72. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?	✗	0 / 1

■ 73. High Conservation Value (HCV) assessments available?	✗	0 / 1
■ 74. High Conservation Value (HCV) management and monitoring plans available?	✗	0 / 1
■ 75. Commitment to the High Carbon Stock (HCS) Approach?	✗	0 / 1
■ 76. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?	✗	0 / 1
■ 77. High Carbon Stock (HCS) assessments available?	✗	0 / 1
■ 78. Commitment to conduct social and environmental impact assessments (SEIAs)?	✓	1 / 1 <a href="#">Source</a>
■ 79. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?	✗	0 / 1
■ 80. Social and environmental impact assessments (SEIAs) available, and associated management and monitoring plans?	✗	0 / 1
<b>■ 81. Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.		



### > Soils, fire and GHGs

2 / 25 / 23 9.8%

⚠ 1 media report




■ 82. Commitment to no planting on peat of any depth?	✗	0 / 1
■ 83. Commitment to no planting on peat of any depth applies to all suppliers?	✗	0 / 1
■ 84. Landbank or planted area on peat (ha)?	✗	0 / 1
■ 85. Implementation of commitment to no planting on peat of any depth?	✗	0 / 1
■ 86. Commitment to best management practices for soils and peat?	✗	0 / 1

<input checked="" type="checkbox"/> 87. Commitment to best management practices for soils and peat applies to all suppliers?	X	0 / 1
<input checked="" type="checkbox"/> 88. Evidence of best management practices for soils and peat?	X	0 / 2
<input checked="" type="checkbox"/> 89. Commitment to reduced impact logging? The company states that it strictly adheres to cutting cycles, yield, annual allowable coupes, cutting rules, logging blocks, inoperable forest, obligatory species, merchantable tree sizes, enumeration and log measurement. The company also adheres to proper engineering specifications for the planning and construction of roads for its forest operations, and sticks to monthly yield limits where applicable. The company also states that it uses helicopter-harvesting in Sarawak since 1993. However, the company does not commit to reduced impact logging best practice across all operations.	P	0.5 / 1 <a href="#">Source</a>
<input checked="" type="checkbox"/> 90. Commitment to reduced impact logging applies to all suppliers?	X	0 / 1
<input checked="" type="checkbox"/> 91. Evidence of implementing reduced impact logging practices?	X	0 / 2
<input checked="" type="checkbox"/> 92. Commitment to zero burning?	✓	1 / 1 <a href="#">Source</a>
<input checked="" type="checkbox"/> 93. Commitment to zero burning applies to all suppliers?	X	0 / 1
<input checked="" type="checkbox"/> 94. Evidence of fire monitoring and management? The company has provided training in fire management and emergency response to employees, and all necessary equipment. Watch towers have also been built to monitor hotspots, but no monitoring plan or system is laid out.	P	0.75 / 2
<input checked="" type="checkbox"/> 95. Details/number of hotspots/fires in company FMUs?	X	0 / 1
<input checked="" type="checkbox"/> 96. Details/number of hotspots/fires in suppliers operations?	X	0 / 1
<input checked="" type="checkbox"/> 97. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?	X	0 / 1
<input checked="" type="checkbox"/> 98. GHG emissions intensity?	X	0 / 1
<input checked="" type="checkbox"/> 99. GHG emissions from land use change?	X	0 / 1
<input checked="" type="checkbox"/> 100. Progress towards commitment to reduce GHG emissions intensity?	X	0 / 1
<input checked="" type="checkbox"/> 101. Methodology used to calculate GHG emissions?	X	0 / 1





 2 media reports

		
<input checked="" type="checkbox"/> <b>102. Time-bound commitment to improve water use intensity?</b> The company states that 'all employees are expected to contribute to minimizing the use of finite resources, including...water'. The company also states that 100% of water used in plantation activities was sourced from rainwater which reduces the total consumption of raw water. However, no specific or time-bound commitment to improve water use intensity is stated.	X	0 / 1 <a href="#">Source</a>
<input type="checkbox"/> <b>103. Water use intensity?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>104. Progress towards commitment on water use intensity?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>105. Time-bound commitment to improve water quality (BOD and COD)?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>106. Progress towards commitment on water quality (BOD and COD)?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>107. Treatment of pulp and paper mill effluent?</b> Treatment of effluent from oil palm operations is detailed, but not pulp and paper mill effluent.	X	0 / 1 <a href="#">Source</a>
<input checked="" type="checkbox"/> <b>108. Evidence of sawmill run-off containment and wastewater treatment?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>109. Proportion of processing facilities with closed-loop water treatment system?</b>	X	0 / 1
<input type="checkbox"/> <b>110. Commitment to protect natural waterways through buffer zones?</b> The company states it establishes buffers zones but it is not clear whether this applies across all operations.	P	0.5 / 1 <a href="#">Source</a>
<input checked="" type="checkbox"/> <b>111. Implementation of commitment to protect natural waterways through buffer zones?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>112. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?</b> The company has an agronomy team that undertakes research and works to adopt integrated pest management methods and continuously improve sustainable agriculture methodology. Only pesticides (not fertilisers) are directly referenced.	P	0.5 / 1 <a href="#">Source</a>
<input checked="" type="checkbox"/> <b>113. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>114. Evidence of eliminating chlorine and chlorine compounds for bleaching?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>115. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?</b>	X	0 / 1
<input checked="" type="checkbox"/> <b>116. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all</b>		

suppliers?	✗	0 / 1
■ 117. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?	✗	0 / 1
■ 118. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?	✗	0 / 1
■ 119. Chemical usage per ha or list of chemicals used?	✗	0 / 1
■ 120. Implementation of commitment to reduce chemical usage? The company states a reduction in use of pesticides, and the use of natural pest management.	P	0.5 / 2 <a href="#">Source</a>
■ 121. Integrated Pest Management (IPM) approach?	✓	1 / 2 <a href="#">Source</a>
■ 122. Waste management system in place to avoid negative impacts? For waste related to timber and plywood production, the company mentions a waste management system, burning waste products to create energy used in the company's operations. Unclear if this applies to all operations.	P	0.5 / 1 <a href="#">Source</a>



## > Community, land and labour rights

5.5 / 35 15.7%

⚠ 5 media reports



■ 123. Commitment to human rights? The company states that it identifies and respects all respective native/communal rights within timber operation areas, but does not refer to the UN Declaration on the Rights of Indigenous Peoples or ILO Indigenous and Tribal Peoples Convention (no. 169).	P	0.5 / 1 <a href="#">Source</a>
■ 124. Commitment to human rights applies to all suppliers?	✗	0 / 1
■ 125. Progress on human rights commitment ?	✗	0 / 1
■ 126. Commitment to respect Indigenous and local communities' rights? The company states that it identifies and respects all respective native/communal rights within timber operation areas, but does not refer to the UN Declaration on the Rights of Indigenous Peoples or ILO Indigenous and Tribal Peoples Convention (no. 169).	P	0.5 / 1 <a href="#">Source</a>
■ 127. Commitment to Indigenous and local communities' rights applies to all suppliers?	✗	0 / 1
■ 128. Commitment to respect legal and customary land tenure rights?	✗	0 / 1

<p><b>129. Commitment to legal and customary land rights applies to all suppliers?</b></p>	✗	0 / 1
<p><b>130. Commitment to free, prior and informed consent (FPIC)?</b></p>	✗	0 / 1
<p><b>131. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?</b></p>	✗	0 / 1
<p><b>132. Details of free, prior and informed consent (FPIC) process available?</b></p>	✗	0 / 1
<p><b>133. Examples of local stakeholder engagement to prevent conflicts?</b> Stakeholder engagement reported, but outcomes are vague and unclear if directly related to preventing conflict.</p>	✗	0 / 1 <a href="#">Source</a>
<p><b>134. Details of process for addressing land conflicts available?</b> The company states it has a Conflict Resolution Committee which deals with customary land rights claims, via a process of open dialogues and negotiations to resolve matters in an amicable matter, but the steps within this process are not given.</p>	P	0.5 / 1 <a href="#">Source</a>
<p><b>135. Supports the inclusion of women across forestry operations, including addressing barriers faced?</b></p>	✗	0 / 1
<p><b>136. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p><b>137. Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities?</b></p>	✗	0 / 1
<p><b>138. Commitment to provide essential community services and facilities ?</b> The company refers to its dedication to community welfare, with initiatives aimed at safeguarding the rights, safety and health of local communities. Examples are given of past funds donated to improve local schools, but no clear commitment is made to future action.</p>	P	0.5 / 1 <a href="#">Source</a>
<p><b>139. Progress on commitment to provide essential community services and facilities?</b> Activities reported of improving local schools.</p>	P	0.5 / 2
<p><b>140. Commitment to provide business/work opportunities for local communities?</b></p>	✗	0 / 1
<p><b>141. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>		
<p><b>142. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?</b></p>	✗	0 / 1

	✘	0 / 1
■ 143. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?		
	✘	0 / 1
■ 144. Progress on commitment to respect all workers' rights?		
	✓	1 / 1 <a href="#">Source</a>
■ 145. Commitment to eliminate gender related discrimination with regards to employment?		
	✘	0 / 1
■ 146. Commitment to eliminate gender related discrimination with regards to employment applies to all suppliers?		
	✘	0 / 1
■ 147. Progress on commitment to eliminate gender related discrimination with regards to employment?		
	✘	0 / 1
■ 148. Percentage or number of temporary employees?		
	✓	1 / 1 <a href="#">Source</a>
■ 149. Percentage or number of women employees?		
	✘	0 / 1
■ 150. Commitment to pay at least minimum wage?		
	✘	0 / 1
■ 151. Commitment to pay at least minimum wage applies to all suppliers?		
	✘	0 / 1
■ 152. Progress on commitment to pay at least minimum wage?		
	✘	0 / 1
■ 153. Reporting of salary by gender?		
	P	0.5 / 1 <a href="#">Source</a>
■ 154. Commitment to address occupational health and safety? The company states that it has a health, safety and environment policy, and that its operations are in compliance with the Occupational Safety and Health Act, 1994, but it does not make reference to ILO Code of Practice.		
	✘	0 / 1
■ 155. Commitment to address occupational health and safety applies to all suppliers?		
	P	0.5 / 1 <a href="#">Source</a>
■ 156. Provision of personal protective equipment and related training? The company reports equipment provided to employees to protect them in fire-management and prevention. Further detail of trainings or PPE provided for other timber operations is not given.		
	✘	0 / 1
■ 157. Time lost due to work-based injuries?		
	✘	0 / 1
■ 158. Number of fatalities as a result of work-based accidents?		



> Smallholders and suppliers

0 / 8 0%

■ 159. Commitment to support smallholders?	✘	0 / 1
■ 160. Programme to support outgrower scheme and/or independent smallholders?	✘	0 / 1
■ 161. Percentage of outgrower scheme and/or independent smallholders involved in programme?	✘	0 / 1
■ 162. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?	✘	0 / 1
■ 163. Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements?	✘	0 / 1
■ 164. Suspension or exclusion criteria for suppliers?	✘	0 / 1
■ 165. Timebound action plans (including Key Performance Indicators) for suppliers to be in compliance with timber and pulp sourcing commitments?	✘	0 / 1
■ 166. Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies?	✘	0 / 1



> Governance and grievances

25 / 17 35.7%

⚠ 4 media reports



■ 167. Commitment to ethical conduct and prohibition of corruption?	✔	1 / 1
■ 168. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?	✘	0 / 1
■ 169. Progress on commitment to ethical conduct and prohibition of corruption?	✘	0 / 1
■ 170. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)?		
This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber		

Portal.			
		✘	0 / 1
■	<b>171. Disclosure of the company's management approach to tax and payments to governments?</b>		
■	<b>172. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?</b> This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.		
■	<b>173. Whistleblowing procedure?</b>	✓	1 / 1 <a href="#">Source</a>
■	<b>174. Own grievance or complaints system open to all stakeholders?</b> The company states it has a grievance procedure, but limited detail is provided and the procedure is only open to employees.	P	0.5 / 1 <a href="#">Source</a>
■	<b>175. Details of complaints and grievances disclosed?</b>	✘	0 / 1

### Media monitor: WTK Holdings

SPOTT monitors global media sources for coverage of assessed companies. The media monitor gathers reports about specific activities related to the assessment indicator categories. ZSL does not assess or score the validity of media coverage, but users can explore the media monitor to provide context on implementation, and infer risks associated with reported operations on the ground.

Last media reports:

[Timber and pulp media reports \(12\)](#)



January 2020

**Report: Sarawakian logging firms party to Papua New Guinea's deforestation**

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1



2