

15th December 2014

Business Human Rights Resource Centre – Myanmar Foreign Investment Tracking Project

1. Does your company have investments or operations in Myanmar or is it seriously considering investing or operating there? If so, please provide information on the nature of these investments, and which geographic areas and communities they will affect.

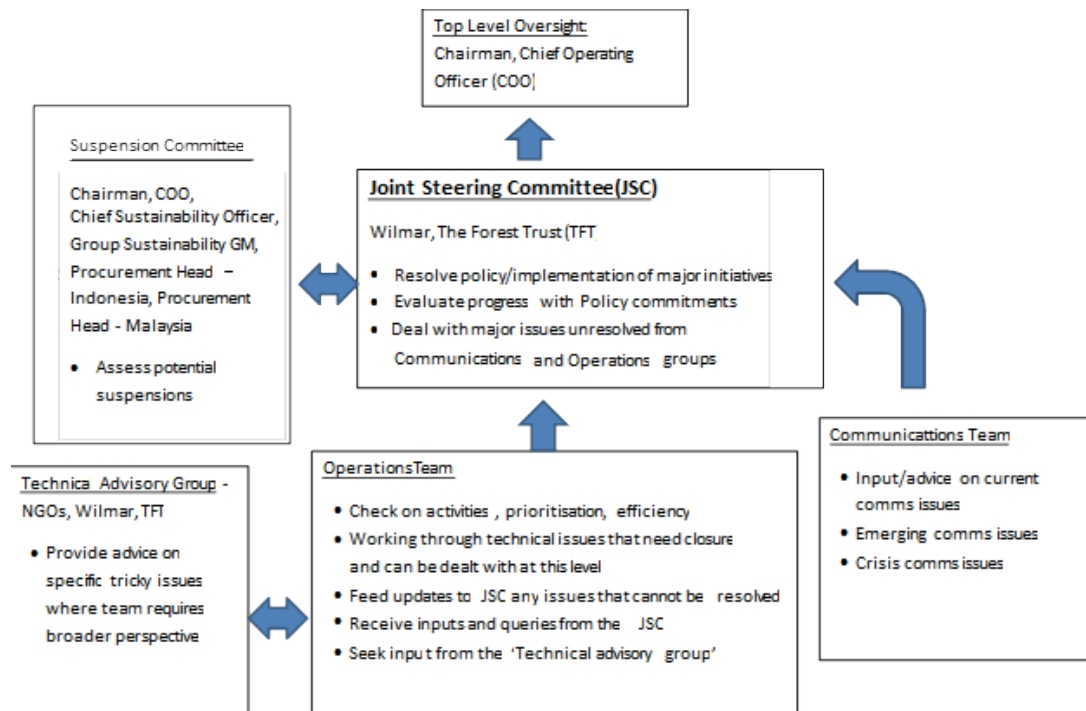
[Wilmar] Attached please find information on our investments in Myanmar. Free Prior and Informed Consent (FPIC) procedures and Environmental and Social Impact Assessments (ESIA) are part of our modus operandi in all development projects. Plan is underway to conduct ESIA in these project areas in Myanmar; prior to the ESIA studies, we have already carried out Initial Environmental Evaluations (IEEs).

2. Do you have policies and procedures in place to prevent your business activities or investment from contributing to human rights abuse and social conflict in Myanmar (including, for example, human rights due diligence measures)? Please specify whether these policies and procedures apply to your company in general, or specifically to your Myanmar investment. If you have human rights policies and procedures regarding investing or operating in Myanmar, are you willing to share them for posting on our website? If so, please send them as a Word or PDF file, or, if available, as a hyperlink.

[Wilmar] Please refer to our No Deforestation, No Peat and No Exploitation Policy (collectively known as the “Integrated Policy”). which includes commitment to respecting human rights - see attached. We have also just set up a grievance procedure which enables stakeholders to raise concerns about our business practices; issues raised through this platform will be reported on our Dashboard (an online site dedicated to reporting on our key sustainability performance indicators) and through our quarterly update reports. The Dashboard is expected to ready later this month.

3. Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?

[Wilmar] Please refer to the Sustainability Governance Structure below:



4. If you do not yet have human rights policies and procedures in place, do you have plans to develop them? If so, what efforts are you currently engaged in or plan to engage in on this regard?

[Wilmar] Please refer to response in Q2.

5. How does your company try to prevent or mitigate conflicts that affect its operations or the surrounding communities (including armed conflict, inter-communal conflict and violence, etc.)? Could you please list your policies, procedures or concrete activities in this regard, including community engagement and dialogue measures and revenue sharing agreements?

[Wilmar] Please refer to our Integrated Policy where we have stipulated our commitment to the FPIC approach as a way to avoid or mitigate conflicts, in addition to our support for the UN Universal Declaration of Human Rights. Our land acquisition procedure takes into account FPIC and also food security/livelihood considerations of the local landowners.

In the conduct of Social and Environmental Impact Assessment (ESIA), the following elements will be considered:

- Analysis of land ownership and user rights;
- Potential impact on surrounding communities from the sugar plantation, including an analysis of potential effects on livelihoods, as well as effects on gender, ethnic communities, and migrant versus long-term residents.

The outcome of these studies will help us understand the local situation better and can help avoid or mitigate social conflicts. The relevant findings will be incorporated into our land acquisition procedure which takes into account FPIC and food security/livelihood considerations of the local landowners, as well as our community development and empowerment programmes to help address these impacts.

6. Who should communities or civil society groups contact if they have questions or concerns about your investment or operations in Myanmar? Please provide their contact information.

[Wilmar] Stakeholders can write in to us via our general sustainability email: [csr@wilmar.com.sg](mailto:csr@wilmar.com.sg) or grievance contact: [grievance\\_procedure@wilmar.com.sg](mailto:grievance_procedure@wilmar.com.sg)

7. We further invite you to respond to questions specific to your industry. Does your company have policies and procedures in place to address each of the following areas? If so, please provide details:

- a. Freedom of association and collective bargaining
- b. Living wages
- c. Workplace health and safety
- d. Child labour
- e. Forced labour
- f. Anti-discrimination (whether based on race, gender, religion, nationality, etc.)
- g. Environment
- h. Land rights
- i. Relocation

[Wilmar] Please refer to Wilmar's Integrated Policy. While the Integrated Policy was only announced in end 2013, we already have had the above policies in place years ago. We recognise our responsibility as a corporate citizen goes beyond our own operations, and as such made a landmark commitment last year to extend our policies to our entire supply chain (including 3<sup>rd</sup> party suppliers, JV partners etc) through the Integrated Policy.