

GRIEVANCE LIST
AEP
8th September 2022

| Number | Source of report | Company | Issues | Action Taken | Outcomes | Category |
|--------|---|-------------------------------|--|---|--|---------------|
| | WILMAR, GAR, MUSIM MAS, APICAL, ASTRA AGRO, KLK | Kahayan Agro Plantation (KAP) | <p>- Mighty Earth report titled, "Rapid Response Report (Nov' 17 2017)</p> <p>- Mighty Earth report titled, "Rapid Response Report 14" (12 April 2019)</p> <p>- Mighty Earth report titled, "Rapid Response Report 15" (22 May 2019)</p> <p>- Mighty Earth report titled, "Rapid Response Report 24" (31 January 2020)</p> <p>- Mighty Earth report titled, "Rapid Response Report 25" (06 March 2020)</p> | <p>- AEP confirmed to all buyers that HCV assessment was conducted by Aksenta in 2011. PT KAP's land clearing was guided by the outcome of the HCV assessment.</p> <p>- The HCS Assessment Activity in KAP was carried out in 2018 due to the buyer's request (Wilmar, GAR, Musim Mas, Apical, Astra Agro, KLK). These buyers were urged by NGOs Mighty Earth and Greenpeace.</p> <p>To perform the assessment process, PT KAP was assisted by a consultant, namely PT. Meganesia Tirta Foresta.</p> <p>- In April 2018 the Land Clearing process was ceased temporarily due to the HCS assessment at PT. KAP, and in July 2018 the HCS assessment process was completed.</p> <p>The HCS document was published and registered on HCSA Network without peer review because it was required as PT. KAP is not an RSPO member. PT.KAP conveyed the information in the report to all buyers.</p> <p>- In August 2018 the Land Clearing process was continued without any development works done within the HCV / HCS locations.</p> <p>- The buyers then asked for a Peer Review to ensure the quality of HCS documents of PT. KAP.</p> <p>Our consultant explained to them that the HCS Assessment Document has been completed and from August 2018 to March 2019, the consultant assisted PT KAP in continuing the development of estates in accordance with the published HCS documents.</p> <p>- In February 2019, the NGO, Mighty Earth released success stories on their website regarding the HCS Assessment which was successfully carried out by PT. KAP.</p> <p>- In April 2019, PT. Sinar Mas (GAR) received pressure from Mighty Earth to get PT. KAP to conduct an immediate peer review and also PT. KAP has to cease the opening of new estates during the peer review process.</p> <p>- Other buyers (Wilmar, Musim Mas, Apical, Astra, KLK) have also asked PT. KAP to perform the peer review, but their request was not as intense as PT. Sinar Mas (GAR)</p> <p>Based on our communication with the Consultant and the HCSA, the estimated time to conduct the peer review process was ± 3.5 Months, The estimated duration could be less depending on the availability of documents requested by HCSA. The peer review process will be assisted by consultants to prepare the document.</p> <p>- The requirement that must be fulfilled during the conduct of the HCS peer review process was that PT KAP must STOP land clearing and it is MUST be done by PT. KAP until the peer review activity was completed.</p> <p>- June 2019, HCS Document of PT. KAP was submitted to HCSA committee panel in Kuala Lumpur</p> <p>- August 2019, HCSA summary report was published by the HCSA committee panel in Kuala Lumpur, where there were several findings related to FPIC (Free Prior Informed Consent)</p> | <p>KAP is committed to preserving the HCS area of 150 ha</p> <p>Status : CLOSED</p> | Deforestation |

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| 1 | | | | <p>- September 9 – 14, 2019, AEP Team and consultants made a visit to PT. KAP to conduct FPIC in 11 villages (in accordance with the location permit).</p> <p>- September 15 – 27, 2019, the compilation of documents of FPIC full report for PT. KAP by Consultants.</p> <p>- September 28, 2019, the Consultants submitted the FPIC document for PT. KAP to HCSA.</p> <p>- HCSA then reviewed HCS and FPIC documents of PT. KAP</p> <p>- PT KAP was expecting the results of the review from the HCSA with the hope that there will be no more findings. If there were no more findings, the results of the review would be published on the website and the development work for the plantations can proceed again.</p> <p>- December 9, 2019, the results of the HCSA peer review were completed and published on the HCSA official website.</p> <p>- January 31, 2020, HCSA wrote an email to PT. KAP that there was a misinterpretation and HCSA apologized for that.</p> <p>- February 10, 2020, HCSA sent a letter to PT. KAP to implement the stop work order (SWO) by stating that the plasma area is a High Priority Patch (HPP) area.</p> <p>They recommended that we need to socialize with the community of independent small holders and explain the delay in plasma development due to misinterpretation by HCSA and we need to identify a new area for plasma</p> <p>- February 28, 2020, PT. KAP sent an official letter to HCSA expressing their disappointment with the sudden alteration of the results of the peer review. We also explained that after we had communicated with the small holders, they refused to postpone and implored our company to continue the development of plasma plantations. This documentation was part of the HCSA meeting planned for March 6, 2020</p> <p>- April 15, 2020, HCSA sent official letter to PT. KAP with apologies of the misinterpretation of the original peer report where the area concerned was identified as a Medium Priority Patch(MPP).</p> | | |

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| | | | | <p>- May 13, 2020, Conference call with HCSA, Consultant & NGO (Mighty Earth) as below :</p> <p>Minutes of Meeting :</p> <p>*PT KAP: Requests HCSA Secretariat to support communicating the decision and explain why this patch must be conserved to community and plasma farmers through a meeting in-person. Company is willing to conserve and put this area under moratorium until as soon as the HCSA team could meet the community and plasma farmers with PT KAP in person. This can be done when travel restrictions are lifted after the Covid-19 situation improves and we can implement the final decision.</p> <p>*PT KAP to explain to the government the reasons for the area to be protected and justify them with reference to the Indonesian laws. HCSA can support PT KAP to prepare the justification based on the Indonesia laws and see whether the changes to the plasma areas will have any legal consequences etc. Earthworm Foundation published a research paper on legal options for protecting forests on land zoned for agriculture in Indonesia and will share it to contribute to this effort.</p> <p>*To plan for the meeting in-person between HCSA representatives and PT KAP with the communities, after the pandemic. To set time to meet the communities, bring interpreter, or expert that can speak the Indonesian language, and with presentation materials that would be suitable for communities to understand the recommendation by HCSA.</p> <p>- 15 December, 2020, Communicated directly by messaging to HCSA (Ms. Judy Rodrigues) and Mighty Earth (Mr. Phil Aikman) about current situation in KAP. PT KAP agreed to conserve the remaining plasma area of 150 hectares and expect that this case to be closed.</p> <p>- 16 December 2020, KAP sent an official letter to HCSA stating confirmation to protect Plasma area /forest land cover in remaining plasma area of 150 Ha.</p> <p>- 18 January, 2021, HCSA replied by letter acknowledging the conservation of the remaining area of forest as a HPP. The HCSA secretariat recommends that the company submit a second public response or update its existing response to the peer review for the HCSA's website about this commitment to the conservation of this 150 Ha.</p> | | |
| 2 | MUSIM MAS | Sawit Graha Manunggal | <p>November 2, 2020, Musim Mas received a report from an NGO, Earthqualizer (EQ), which reported that PT Sawit Graha Manunggal (PT SGM) as a subsidiary of Anglo-Eastern Plantations PLC carried out land clearing activities in dense tree cover with the following details:</p> <ul style="list-style-type: none"> - area of 5 hectares in the period Jan – May 2020 - area of 5 hectares in the period 01 – 15 June 2020 | ground truthing by GIS team | <p>The area in Land Clearing is a rubber plantation belonging to the community who have been compensated and outside the HCV area.</p> <p>STATUS : CLOSED</p> | Deforestation |

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| 3 | APICAL | Kahayan Agro Plantation dan Sawit Graha Manunggal | May 31, 2021 , Based on the results of deforestation monitoring carried out by Apical's 3rd party, there was land clearing of 21 ha in PT KAP and 11 ha in PT SGM in the period Jan-Mar 2021. | ground truthing by GIS team | The area in Land Clearing is a rubber plantation belonging to the community who have been compensated and outside the HCV area. STATUS : CLOSED | Deforestation |
| 4 | WILMAR | Sawit Graha Manunggal | June 17, 2021 , allegations of land clearing (deforestation) in one of the Anglo Eastern Plantation's plantations, namely Sawit Graha Manunggal covering an area of 12.82 hectares in the period 20 January – 20 April 2021. | ground truthing by GIS team | The area in Land Clearing is a rubber plantation belonging to the community who have been compensated. STATUS : CLOSED | Deforestation |