

**GREENPEACE**

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**ROGUE**

**TRADER**

**KEEPING DEFORESTATION IN THE FAMILY**



31 March 2018, PT  
Agrinusa Persada  
Mulia, 7°33'23.35"S  
140°46'43.78"E  
©Ifansasti/Greenpeace



Wilmar International Board. Photo from Wilmar's 2017 Sustainability Report.

From left to right:

- |  |  |
|--|--|
| 1. Weijian Shan, Independent Director                            | 8. Yeo Tong Yang, Lead Independent Director                          |
| 2. Lim Siong Guan, Independent Director                          | 9. Kuok Khoon Ean, Non-Executive Director                            |
| 3. Kuok Khoon Hua, Non-Executive Director                        | 10. Tay Kah Chye, Independent Director                               |
| 4. Juan Ricardo Luciano, Non-Executive Director                  | 11. Kishore Mahubani, Independent Director                           |
| 5. Martua Sitorus, Non-Executive Director                        | 12. Kwah Thiam Hock, Independent Director                            |
| 6. Pua Seck Guan, Chief Operating Officer and Executive Director | 13. Raymond Guy Young, Alternate Director to Mr Juan Ricardo Luciano |
| 7. Kuok Khoon Hong, Chairman and Chief Executive Officer         |  |

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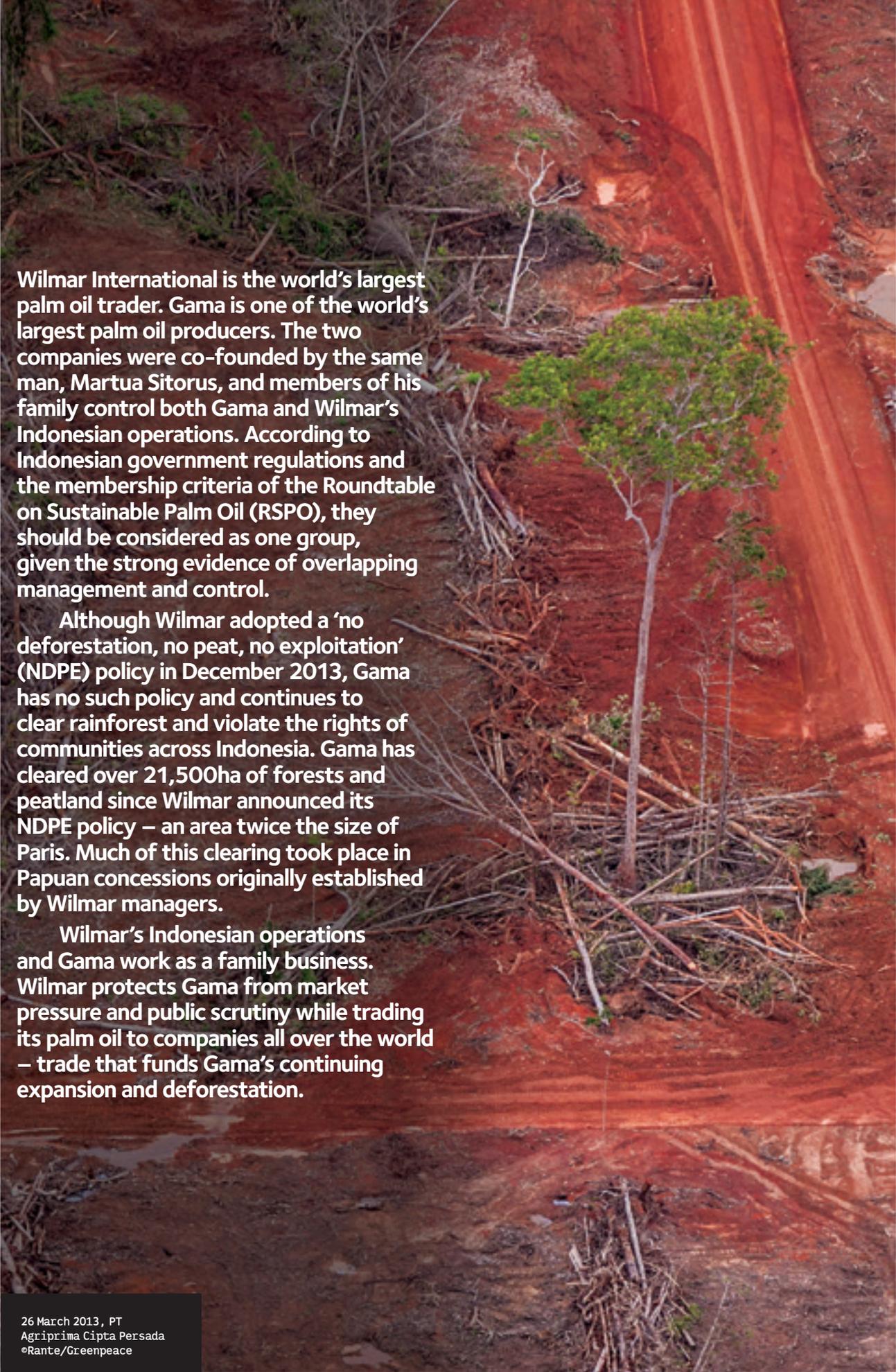
# **‘NEVER IN MARTUA’S AND MY WILDEST DREAMS DID WE EXPECT WILMAR TO BECOME WHAT IT IS TODAY.’<sup>1</sup>**

KUOK KHOON HONG, CEO, WILMAR INTERNATIONAL

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A photograph showing a landscape of red soil and cut logs, with a single green tree standing in the center. The background shows a steep, eroded hillside with red soil and some sparse vegetation. The foreground is filled with cut logs and branches, suggesting recent deforestation.

**Wilmar International is the world's largest palm oil trader. Gama is one of the world's largest palm oil producers. The two companies were co-founded by the same man, Martua Sitorus, and members of his family control both Gama and Wilmar's Indonesian operations. According to Indonesian government regulations and the membership criteria of the Roundtable on Sustainable Palm Oil (RSPO), they should be considered as one group, given the strong evidence of overlapping management and control.**

**Although Wilmar adopted a 'no deforestation, no peat, no exploitation' (NDPE) policy in December 2013, Gama has no such policy and continues to clear rainforest and violate the rights of communities across Indonesia. Gama has cleared over 21,500ha of forests and peatland since Wilmar announced its NDPE policy – an area twice the size of Paris. Much of this clearing took place in Papuan concessions originally established by Wilmar managers.**

**Wilmar's Indonesian operations and Gama work as a family business. Wilmar protects Gama from market pressure and public scrutiny while trading its palm oil to companies all over the world – trade that funds Gama's continuing expansion and deforestation.**

***'We can produce palm oil in a way that protects forests, clean air and local communities, all while contributing to development and prosperity in palm oil growing regions. We know from our customers and other stakeholders that there is a strong and rapidly growing demand for traceable, deforestation-free palm oil, and we intend to meet it as a core element of our growth strategy.'***

KUOK KHOON HONG, CEO, WILMAR INTERNATIONAL

## **WILMAR INTERNATIONAL: A SUSTAINABILITY LEADER?**

Wilmar International Limited is the world's largest palm oil trader.<sup>3</sup> In December 2013, it adopted an NDPE policy that applied both to its own operations as a producer and to those of its suppliers.<sup>4</sup> The policy's comprehensiveness and 'credible plan for implementation' were hailed by its implementation partner, The Forest Trust.<sup>5</sup>

The public face of Wilmar International is its CEO and Chairman, Kuok Khoon Hong. Kuok, often known by his nickname William,<sup>6</sup> is one of the richest men in Singapore.<sup>7</sup>

At the end of 2017, Wilmar had a total planted area of 239,935ha of oil palm, around 68% of which was in Indonesia, 24% in Malaysian Borneo and 8% in Africa.<sup>8</sup>

In November 2017, Wilmar became the first company in the palm oil industry to take a loan with an interest rate pegged to its sustainability efforts.<sup>9</sup>

## **MARTUA SITORUS: THE MAN BEHIND WILMAR AND GAMA**

Kuok founded Wilmar in 1991 with his business partner, Martua Sitorus.<sup>10</sup> Indeed, 'Wilmar' is an amalgamation of its founders' first names – WILliam and MARTua.<sup>11</sup>

In addition to Wilmar, Kuok and Sitorus have collaborated on a number of other investments, notably in the fields of property and energy, either directly or through their respective offshore companies HPRY Holdings Ltd and Burlingham International.<sup>12</sup>

Until very recently, Kuok and Sitorus ran Wilmar together. According to statements by the company, Kuok is 'overall in charge of the management of the Group with a particular focus on new business developments',<sup>13</sup> while Sitorus was 'instrumental in the development of the Group's business operations in Indonesia'.<sup>14</sup>

Martua Sitorus has been on Wilmar's board since the company went public in 2006.<sup>15</sup> He was Executive Director/Chief Operating Officer until June 2013, when he stepped down to 'focus more time on his family business'.<sup>16</sup> He then served as Executive Deputy Chairman in charge of Wilmar's operations in Indonesia and its plantation operations<sup>17</sup> until he stepped down in March 2017, again to 'focus his attention on his family business'.<sup>18</sup> He remains on Wilmar's board of directors as a non-independent non-executive director.

Wilmar is not the only business to bear Sitorus's name. Together with his brother Ganda (who goes by this single name), Martua Sitorus established the Gama group – an amalgamation of GAnda and MArtua – in 2011. Sitorus's profile on Wilmar's website describes him as 'the CEO of Gama Corp group of companies',<sup>19</sup> presumably the 'family business' that was referred to each time his role changed.

Sitorus is not the only person to have a hand in both Wilmar and Gama. In fact, members of Ganda's and Martua Sitorus's family<sup>20</sup> control Wilmar's Indonesian operations and decide which companies in Indonesia Wilmar International trades with. The same people and their close relatives also own or manage Gama companies.<sup>21</sup>

Gama appears to be pursuing a deliberate strategy of using Wilmar to advance the family's business interests.

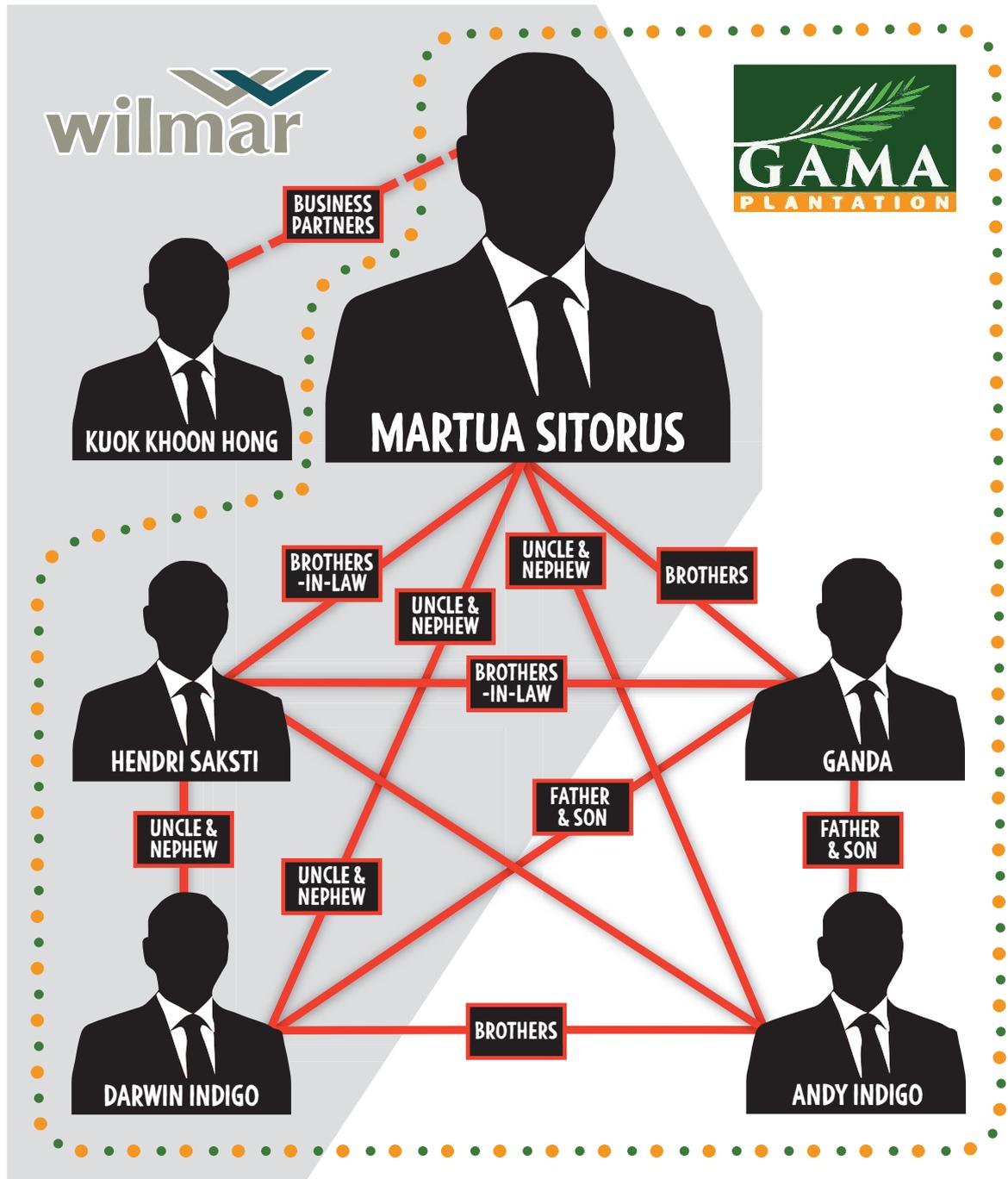
Hendri Saksti, brother-in-law of Ganda and Martua Sitorus,<sup>22</sup> is Wilmar International's Country Head for Indonesia.<sup>23</sup> Saksti is also the majority shareholder of oil palm plantation company PT Agro Alam Nusantara,<sup>24</sup> reportedly managed by Gama,<sup>25</sup> and is Commissioner of PT Tritunggal Sentra Buana,<sup>26</sup> a plantation company that was 50% owned by Wilmar until it was sold to Gama in May 2018 (see below). He is also Commissioner of Katingan Timber Celebes,<sup>27</sup> part of Katingan Timber Group, another Gama company.

Darwin Indigo, Ganda's son and Sitorus's nephew,<sup>28</sup> is another family member holding key management positions in Wilmar and Gama. He is Wilmar International's Deputy Country Head for Indonesia and General Manager with responsibility for trading in Indonesia.<sup>29</sup> Within Gama, he is a director of the group's joint venture with Samsung C&T Corporation.<sup>30</sup> Darwin's brother, Andy Indigo,<sup>31</sup> controls Gama's Indonesian plantations.<sup>32</sup>



**'Gama Group or Gama Corp is not a legal entity. It is a name given to a group of companies owned by Mr Ganda and his brother, Mr Martua Sitorus.'**

FAX TO GREENPEACE FROM KUOK KHOON HONG, 20 JUNE 2018



13 September 2013,  
PT Jatimjaya Perkasa,  
1°55'55.41"N  
100°49'33.19"E  
©Tambunan/Greenpeace



## THE TANGLED WEB OF THE WILMAR/ GAMA EMPIRE

Wilmar and Gama are portrayed by the Sitorus family and company management as two entirely independent entities. Yet the two groups are clearly enmeshed, at least within Indonesia, to the point where it is difficult to see where Wilmar's Indonesian operations stop and Gama's start (and vice versa). Several Gama companies – and Wilmar's Indonesian head office – were until recently based in the same building, Multivision Tower in Jakarta, albeit on adjacent floors.<sup>48</sup>

In addition to the very close family ties already mentioned, executives from one side of the business often establish and/or manage companies and plantations belonging to the other. For example, according to an audit by the World Bank Group's Compliance Advisor/Ombudsman, both Ganda and

Martua Sitorus helped establish and manage PT Karya Prajona Nalayan (PT KPN).<sup>49</sup> PT KPN subsequently became part of Wilmar International. Other examples of management crossover between Wilmar and Gama are considered below.

Further, the Wilmar side of the business has a history of avoiding dealing with serious human rights or environmental violations in its concessions by selling the problematic concessions to Gama. For example, PT Jatimjaya Perkasa, in northern Riau, started out as a Wilmar concession;<sup>50</sup> it was sold to Gama in 2005<sup>51</sup> following NGO reports of deforestation.<sup>52</sup>

As a result, Gama has been described as 'a clearinghouse for troublesome Wilmar subsidiaries that could be a threat to the publicly traded corporation's reputation'.<sup>53</sup>

# CONCESSION CASE STUDY: PT PERKEBUNAN ANAK NEGERI PASAMAN (PT PANP), WEST KALIMANTAN



Offshore ownership: HPR Investments Ltd (34%), Bonoto Investments Ltd (33.5%), Festive Investments Ltd (17.5%), Silvery Ltd (9%)

Current management: Andy Indigo, Chusnul Nurtjhaha, Hendri Saksti, Riadi Didik Tjahjanto

One example of the blurred lines between the two sides of the empire is PT PANP, a plantation company with two concessions in West Kalimantan. It was established in 2008 by Kuok Khoon Hong (Chairman), Martua Sitorus (Commissioner), Ganda (Director), Hendri Saksti (Director) and Wilmar's Head of Plantations, Guh Ing Sing (President Director).<sup>54</sup> From the outset PT PANP was majority-owned by four offshore holding companies, two of which together currently hold a majority stake: one of these, HPR Investments Ltd, is linked to and reportedly co-owned by Kuok<sup>55</sup> and the other, Bonoto Investments Ltd, is linked to and reportedly co-owned by Sitorus.<sup>56</sup>

In 2009, Kuok, Guh, Saksti and Sitorus left the company (although Kuok's and Sitorus's offshore companies retained their majority stake); Ganda and his son Andy Indigo ran the business as Chairman and Director until December 2015, when there was a change of management.<sup>57</sup>

The board structure changed again in March 2018, when Andy Indigo, Hendri Saksti and Chusnul Nurtjhaha, Head of Plantations at AMS Ganda Group,<sup>58</sup> took control of the company. Throughout these management changes, PT PANP has remained majority-owned by Kuok's and Sitorus's offshore companies.<sup>59</sup>

The company's two Kalimantan concessions were included on a 2015 AMS Ganda Group spreadsheet obtained by Greenpeace.<sup>60</sup> LinkedIn profiles of staff working on the plantations in Kalimantan also refer to AMS Group.<sup>61</sup>

The facts seem clear: PT PANP is owned by Kuok and Sitorus and operated by Gama.

**PROFIL PERUSAHAAN  
PT PERKEBUNAN ANAK NEGERI  
PASAMAN**

Klasifikasi Saham	Harga Per Lembar	Jumlah Lembar Saham	Total		
-	Rp. 1.000	10.150.000	Rp. 10.150.000.000		
<b>MODAL DISETOR</b>					
Rp 10.150.000.000					
Dalam bentuk uang.					
<b>PENGURUS DAN PEMEGANG SAHAM</b>					
Nama	Jabatan	Alamat	Klasifikasi Saham	Jumlah Lembar Saham	Total
RICKY HERMANTO, NIK: 02.5001.070456.0000 TTL: PONTIANAK, 07 April 1956	Komisaris	TAMAN SITIJA BUDI INDAH II BLOK B1 NO. 43	-	152.250	Rp. 152.250.000
BENNY DJUARSA, NIK: 09.5309.210761.0001 TTL: PANGCAL PINANG, 27 Juli 1962	Komisaris	JAGAKARSA 1/98	-	152.250	Rp. 152.250.000
MARTUA SITORUS, NIK: 03.0310.06 TTL: PEMATANG SIANTAR, 18 Februari 1960	Komisaris	PORE AVE 14	-	-	-
GANDA, NIK: 09.5002.070137.0300 TTL: PEMATANG SIANTAR, 07 Maret 1957	Dirutur	JL. BINTAMANI LNO. 1	-	-	-
HENDRI SAKSTI, NIK: 09.5002.070388.0700 TTL: ISARUA BATAH, 01 Mei 1952	Dirutur	JL. RAJAWALI SELATAN BLOK A NO. 2	-	-	-
KUOK KHOO HONG, NIK: 3.230790C TTL: MALAYSIA, 30 April 1949	Komisaris Utama	TANJUNG RBU ROAD 6 NO. 59-00	-	-	-
GUH ING SING, NIK: 2C279C-00484F TTL: PERAK, 21 November 1956	Dirutur Utama	JL. BLADAK NO. 82	-	-	-
SILVERY LIMITED, Nomor SK -	-	JL. POST OFFICE BOX 71, TORTOLA	-	913.500	Rp. 913.500.000

Summary registry documents for PT Perkebunan Anak Negeri Pasaman show historic shared management by members of Martua Sitorus's family and Kuok Khoon Hong. Silvery Ltd remains one of the offshore holding companies, obscuring ultimate beneficial ownership.

# WILMAR'S HISTORY OF SOCIAL CONFLICT

Despite being one of the first palm oil companies to adopt an NDPE policy, Wilmar still has an unresolved legacy of exploitation and social conflict.

PT Bumi Sawit Kencana II, a Wilmar concession in Central Kalimantan, has reportedly been at the centre of a land conflict for more than a decade, with repeated violence towards local residents.<sup>62</sup> In 2013 clashes broke out with company security guards after residents protested against the construction of a canal which would have cut off access to the disputed land. Four community members were injured.<sup>63</sup> In June 2016, villagers submitted a formal complaint to the RSPO – so far unresolved – claiming that the company had taken 78ha of their land without compensation.<sup>64</sup> Most recently, on 19 December 2017, members of

the police mobile brigade shot and wounded two farmers within the concession,<sup>65</sup> after local people had gone to the company offices to demonstrate about the land issue.<sup>66</sup>

Wilmar also faces serious allegations of worker exploitation by its plantation companies. In November 2016 Amnesty International reported systematic abuses in the North Sumatra estates of PT Perkebunan Milano and PT Daya Labuhan Indah, including unrealistic targets that resulted in excessive workloads and led to employees' children helping with dangerous tasks on the plantation.<sup>67</sup> In April 2017, SOMO and CNV International investigated labour issues in PT Murini Sam Sam's concession in Riau and found many workers in insecure employment, along with evidence pointing to forced labour.<sup>68</sup>

15 January 2015, Jambi, 1°56'13.999"S 103°17'30"E:  
The Suku Anak Dalam community was forcibly evicted from its traditional lands by armed security forces, including police officers, security and staff of PT Asiatic Persada on 11 December 2013. ©Rante/Greenpeace



# CONCESSION CASE STUDY: PT ASIATIC PERSADA (PT AP)/PT BERKAT SAWIT UTAMA (PT BSU), JAMBI, BATANGHARI AND MUARO JAMBI DISTRICTS



**Offshore ownership:** Fullest Holdings Limited (53%), Rise Glory Interprises Limited (10%), Silvery Limited (10%)

**Direct parent:** PT Perkebunan Prima Manunggal (95%)

**Current management:** Andy Indigo (PT PPM); Dinar, Halim Gozali, Djuaman

PT AP, renamed PT BSU in December 2016,<sup>69</sup> is a plantation company in Jambi formerly owned by Wilmar<sup>70</sup> and involved in a protracted land conflict with the Suku Anak Dalam indigenous group.<sup>71</sup>

In February 2011, Forest Peoples Programme (FPP) and community members brought a complaint against Wilmar and PT AP to the RSPO.<sup>72</sup> Later that year, FPP reported that the Indonesian military, in partnership with PT AP, had 'systematically evicted people from three settlements, firing guns to scare them off and then using heavy machinery to destroy their dwellings and bulldoze concrete floors into the nearby creeks'.<sup>73</sup>

In 2013, Wilmar sold PT AP to Prima Fortune International and PT AMS,<sup>74</sup> both Gama companies.<sup>75</sup> Wilmar, however, was strangely coy, its Sustainability Report stating simply that it had 'made a commercial decision to divest all shareholdings in PT Asiatic Persada to an Indonesian company, Prima Fortune International Limited',<sup>76</sup> with no mention that that company was owned by Gama. The RSPO rightly noted these companies were part of Gama, and that because several Gama companies were RSPO members, the group as a whole should abide by the RSPO's Code of Conduct. It wrote to PT AMS to request their continued involvement in the mediation process, acknowledging an apparent prior commitment by Gama to do so.<sup>77</sup>

Yet soon afterwards, Gama withdrew from the mediation

12 January 2014, Jambi, 1°56'7.999"S 103°16'52.999"E:  
A father and his young daughter, members of the community  
evicted from its traditional lands within PT Asiatic Persada.  
©Rante/Greenpeace



process that had been ongoing between Wilmar and the community.<sup>78</sup> Just eight months after the sale, hundreds of indigenous families were violently evicted from their homes within the concession by police and military – action allegedly paid for by PT AP to clear the land of people.<sup>79</sup>

After the 2013 sale, Wilmar claimed to 'no longer purchase FFB or [crude palm oil] from PT AP/BSU'.<sup>80</sup> In 2016, it stated that it 'would not accept oil from PT Asiatic Persada entering our supply chain',<sup>81</sup> indicating that it had excluded the company, presumably because of the human rights violations that had started under Wilmar's control and continued under Gama's.

Wilmar treated PT AP/BSU as an isolated plantation company instead of one connected to Gama, whose oil it has continued to trade (despite claims to the contrary – see below).<sup>82</sup>

PT BSU is now owned by PT Perkebunan Prima Manunggal (PT PPM – 95%) and PT AMS (5%).<sup>83</sup> PT PPM is managed by Andy Indigo<sup>84</sup> and currently owned by offshore companies connected to the family; it was owned by Andy Indigo and Jacqueline Sitorus through a complex shell structure until ownership was transferred offshore in September 2017.<sup>85</sup>

PT AP/BSU is not the most recent instance of Wilmar offloading a problematic plantation company to Gama. In 2013, the World Wildlife Fund documented Wilmar subsidiary PT Citra Riau Sarana (PT CRS) receiving oil palm fresh fruit bunches (FFB) from illegally cleared land within the Tesso Nilo National Park in Riau.<sup>86</sup>

The following year, Wilmar sold a majority stake in PT CRS to PT Wahana Agro Penjasakti, a Gama<sup>87</sup> company with an offshore owner, Team Ventures Investments Ltd.<sup>88</sup> Under Gama, PT CRS continued to purchase illegal FFB,<sup>89</sup> and according to its most recent supply chain information Wilmar continued sourcing from PT CRS.<sup>90</sup>

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**'Although Mr Hendri Saksti and Mr Darwin Indigo are senior executives of the Wilmar Group ...The fact that they are relatives of Mr Sitorus, does not mean that Gama Corp exercises management control over Wilmar.'**

FAX TO GREENPEACE FROM KUOK KHOON HONG, 20 JUNE 2018

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# WILMAR'S TRADE ENABLES GAMA'S RAINFOREST DESTRUCTION

In recent years, the broader Wilmar International group, led by Kuok, has focused on expansion into new commodities and regions. Meanwhile, Sitorus and family – notably his brother-in-law Hendri Saksti and nephew Darwin Indigo – have assumed control over Wilmar's Indonesian operations, which are being run in the interests of Gama, their family business. Wilmar International continues trading palm oil from Gama's plantations despite its violations of Wilmar's NDPE policy, thereby ensuring a continued market for Gama's palm oil as the company expands into new areas.

Over 21,500ha of rainforest have been destroyed in Gama concessions since Wilmar announced its NDPE policy at the end of 2013,<sup>91</sup> more than half of it in the cases examined in this report. Not only has Wilmar helped provide Gama with the trade that bankrolled this destruction, but two of the three concessions in the cases outlined below were established by Wilmar employees.<sup>92</sup> All three concessions were owned or managed by Andy Indigo or his father Ganda during the period in which much of the clearance took place.<sup>93</sup>



31 March 2018,  
PT Agrinusa Persada Mulia,  
7°31'2.754"S  
140°44'24.012"E  
©Ifansasti/Greenpeace



31 March 2018,  
PT Agrinusa Persada Mulia,  
7°32'31.655"S  
140°47'52.596"E  
©Ifansasti/Greenpeace

**CONCESSION CASE  
STUDY: PT GRAHA AGRO  
NUSANTARA (PT GAN),  
WEST KALIMANTAN,  
KUBU RAYA DISTRICT**



Concession boundary based on March 2014 plantation business permit (Izin Usaha Perkebunan; IUP) map from Kubu Raya district government and information from local sources.<sup>94</sup>



Mosaic of satellite imagery: Landsat 8 (USGS), Planet Labs Inc and GoogleEarth.





**Offshore ownership:** Capital Ocean Ventures Ltd (95%)

**Direct parent:** PT Prima Panca Lestari (95%), PT Wahana Agro Indonesia (5%)

**Current management:** Andy Indigo (PT PPL); Chusnul Nurtjahja, Soemanto Sastro, Sri Sampurno (PT GAN)

PT GAN has been clearing in the Kubu Raya district of West Kalimantan since at least 2013. Since 2014 the company has cleared over 7,000ha of forest and peatland.<sup>95</sup>

Until December 2016, PT GAN was ultimately owned by Andy Indigo and Jacqueline Sitorus through PT GSU; it is currently a subsidiary of one of Gama's main offshore holding companies, Capital Ocean Ventures Ltd.<sup>96</sup>

The PT GAN concession overlaps with some 4,500ha of orangutan habitat.<sup>97</sup> While some of this habitat remains, most of these forests have already been cleared and plantation blocks have been marked for clearance in the remaining areas (see below). In September 2015, plantation workers inside the PT GAN concession reported finding a

13 December 2013,  
PT Graha Agro Nusantara,  
0°12'18.698"S 109°40'32.66"E:  
©Ifansast1/Greenpeace

13 September 2015,  
West Kalimantan:  
A baby orang-utan rescued  
from Gama's PT GAN oil palm  
concession following extensive  
forest and peatland fires.  
©Nanda/Greenpeace



disorientated baby orangutan – its mother was not found.<sup>98</sup>

Between January 2016 and December 2016, PT GAN cleared and/or planted around 1,500ha of peatland forest. Between January and September 2017, plantation blocks were marked out over more than 1,200ha of peatland forest in preparation for clearance. Aerial photos from March 2018 confirm that ditches have been dug in peatland forest.<sup>99</sup>

The new plantation blocks have been cut in areas released from the Forest Estate by former Forestry Minister Zulkifli Hasan on 29 September 2014, his final day as minister. On that same day he signed a whole sheaf of permits releasing State Forest land for development by various plantation groups; many of these permits were problematic and several of them broke the ministry's own regulations.<sup>100</sup>

The Indonesian government is reportedly taking law enforcement action against PT GAN for developing on peatland,<sup>101</sup> according to ForestHints, widely regarded as a 'semi-official mouthpiece' of the Indonesian Ministry of Environment and Forestry.<sup>102</sup>

PT GAN has recently opened a new palm oil mill within its concession.<sup>103</sup> It is not yet known whom it supplies.



31 March 2018,  
PT Agriprima Cipta Persada,  
7°30'25.84"S 140°29'30.919"E:  
©Ifansasti/Greenpeace

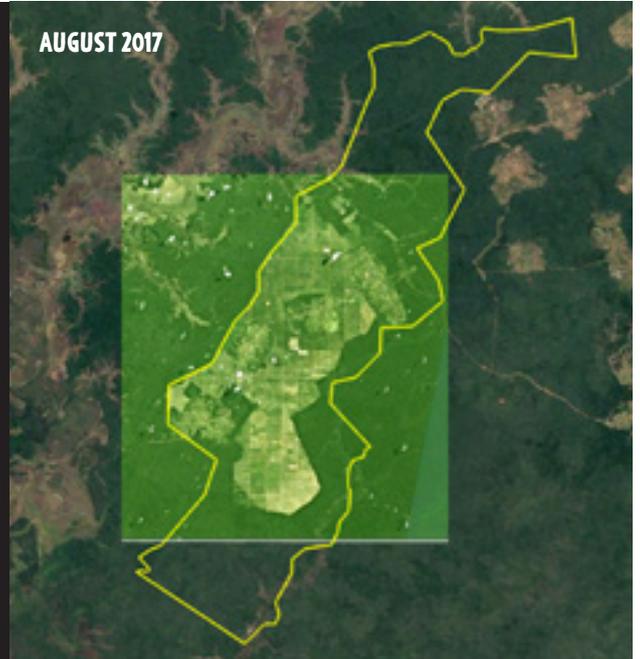
# CONCESSION CASE STUDY: PT AGRIPRIMA CIPTA PERSADA (PT ACP), PAPUA, MERAUKE DISTRICT



DECEMBER 2015



Satellite Image December 2015  
source: Google Earth



AUGUST 2017

Satellite image August 2017 sources:  
Google Earth and (Landsat 8) USGS  
Boundary concession: BPN-HGU

**Offshore ownership:** Fullest Holdings Limited (53%), Rise Glory Interprises Limited (10%), Silvery Limited (10%)

**Direct parent:** PT Perkebunan Prima Manunggal (95%), PT Karya Agung Megah Utama (5%)

**Current management:** Andy Indigo (PT PPM); Chusnul Nurtjahja, Dani Mudoko (PT ACP)

PT ACP appears to have originally been destined to be a Wilmar company. It was established on 11 June 2008 by two men who were at that time managers of Wilmar subsidiary PT Wilmar Cahaya Indonesia.<sup>104</sup> Furthermore, in April 2009, Wilmar executives and the Governor of Jambi province reportedly signed a memorandum of understanding to build a port in Tanjung Jabung Timur district, which was to be operated by PT ACP.<sup>105</sup>

Less than a year later, plans had evidently changed: the company was issued with a location permit in Merauke,<sup>106</sup> and four months later a majority stake in PT ACP was transferred to Fullest Holdings Ltd.<sup>107</sup> Ganda was briefly Commissioner of PT ACP in June 2010.<sup>108</sup>

PT ACP now operates as a subsidiary of Gama holding company PT PPM, which is owned by four different offshore companies, including Fullest Holdings Ltd, and managed by Andy Indigo.<sup>109</sup>

Between 2015 and 2017, PT ACP cleared 3,190ha of forest.<sup>110</sup> In July 2017, the Indonesian Minister of Environment

and Forestry gave permission to release a portion of its concession that still lay within the Forest Estate.<sup>111</sup> By October 2017, PT ACP had started cutting new plantation blocks in that area. Forest clearance has continued in 2018.<sup>112</sup>

The concession, in the Muting area of Merauke district in southern Papua province, is situated close to the Trans-Papua road which runs along the border with Papua New Guinea, an area with a heavy military presence. It lies within the ancestral land of the Marind ethnic group. Land conflict between PT ACP and the Mahuze Besar clan is reportedly ongoing,<sup>113</sup> with claims that the company has not obtained the free, prior and informed consent (FPIC) of the whole clan for its clearing of the forest. PT ACP reportedly claims to have obtained consent for development of the collectively owned clan land based on the signature of one man, who has since died;<sup>114</sup> significant areas of forest belonging to the clan have already been cleared.

In 2015, the clan began erecting notices to signify that it had placed the land under *sasi*, a form of customary law prohibition. Nevertheless, the company reportedly continued to clear the land, removing the signs.<sup>115</sup> In 2016, a representative of the military visited the clan leader, who opposed the plantation, to inform him that a military cooperative was taking over the contract for land clearing.<sup>116</sup> The clan refused to back down, however, and as of September 2017 no agreement had been reached.<sup>117</sup>

# CONCESSION CASE STUDY: PT AGRINUSA PERSADA MULIA (PT APM), PAPUA, MERAUKE DISTRICT

**Offshore ownership:** Fullest Holdings Limited (53%), Rise Glory Interprises Limited (10%), Silvery Limited (10%)

**Direct parent:** PT Perkebunan Prima Manunggal (95%), PT Karya Agung Megah Utama (5%)

**Current management:** Andy Indigo (PT PPM); Chusnul Nurtjahja, Dani Murdoko (PT APM)

The ownership history for PT APM is almost identical to that of PT ACP. It was established on the same day in 2008 by the same two Wilmar managers.<sup>118</sup> Ganda was also Commissioner for the same few weeks in June 2010. Like PT ACP, PT APM is currently a subsidiary of PT PPM, which is managed by Andy Indigo and controlled by Gama through a network of offshore companies.<sup>119</sup>

Between January 2016 and August 2017, PT APM cleared 2,500ha of forest. Forest clearing has continued in 2018.<sup>120</sup>

The PT APM concession is located on the land of the Yei ethnic group, and there are clear indications that the company has not engaged in a responsible FPIC process with them. Several clans own land in Bupul village; when the company approached them, some clans agreed to a concession while others rejected the company's offer.<sup>121</sup> The company reportedly continued to press individual members of these latter clans for signatures that it could use to claim consent has been given, without obtaining the consent of the whole clan. In the case of the Mandaljai clan, the company reportedly obtained the signature of the brother of the clan chief, who was himself opposed to development. In another case, a clan leader was reportedly pressured to sign a letter by two police officers who approached him while he was at Sunday mass.<sup>122</sup>

Such actions would be neither honest and open nor respectful of clans' right to decide collectively whether to accept or reject a company's offer. Nor would they be legal: the Papuan Special Autonomy Law (UU21/2001) states that any decision about customary land must be made by a decision-making council (*musyawarah*), in recognition of the fact that customary rights (*ulayat* rights) belong to the clan, in accordance with customary law in the area, not to individuals.<sup>123</sup>



Concession boundary based on location permit (Izin Lokasi), reference SK No. 4, tgl 13-01-2010.

December 2015 source: Google Earth



JANUARY 2018

Scale 1:250,000

Satellite image January 2018 source: Planet Labs Inc.



19 December 2017,  
PT Agrinusa Persada Mulia,  
7°30'33.978"S  
140°46'23.615"E  
©Sukarno/Greenpeace



Detail image August 2017 source: Planet Labs Inc.



18 January 2014,  
PT Agriprima Cipta Persada,  
7°24'30.821" S 140°30'41.652" E  
©Ifansasti/Greenpeace



# WILMAR INTERNATIONAL IS HIDING GAMA FROM ITS CUSTOMERS

**'With regard to the purchase of palm oil from companies suspected to be affiliated with Gama Corp, we acknowledge that there should have been more stringent oversight on the ownership verification process in respect of these companies by Wilmar.'**

FAX TO GREENPEACE FROM KUOK KHOON HONG, 20 JUNE 2018

Wilmar International is Gama's principal route to market and trades its palm oil to companies all over the world. Gama mills<sup>124</sup> – ie those owned or managed by Ganda and Martua Sitorus and other members of their family – appear throughout the supply chains of Wilmar International and its customers, including major brands and other palm oil traders.

However, Wilmar International insists that it 'does not source from Gama Plantations'.<sup>125</sup>

Wilmar has chosen largely to ignore group-level ownership in its supply chain data. It thus classifies the Gama mills from which it buys as unconnected to each other (and to Wilmar), even though Wilmar's senior staff in Indonesia are members of Ganda and Martua Sitorus's family and must know otherwise.

Wilmar appears to be following Gama's direction when reporting ownership of the Gama companies from which it buys. This approach allows Gama to hide in plain sight and evade market pressure.

Greenpeace has obtained a copy of a letter from PT GSU to Wilmar dated 3 August 2015, which claims that PT Patiware, PT Alam Jaya Persada (PT AJP) and PT Jatim Jaya Perkasa [sic] are part of PT GSU. Wilmar has shown Greenpeace another letter from PT GSU dated 19 October 2017, which lists PT AJP, PT Jatimjaya Perkasa, PT Tritunggal Sentra Buana (PT TSB) and PT TH Indo Plantations as subsidiaries of the company.

However, of the companies mentioned in PT GSU's letters, only PT AJP and PT Patiware were subsidiaries of PT GSU at the time the relevant letters were written.<sup>126</sup>

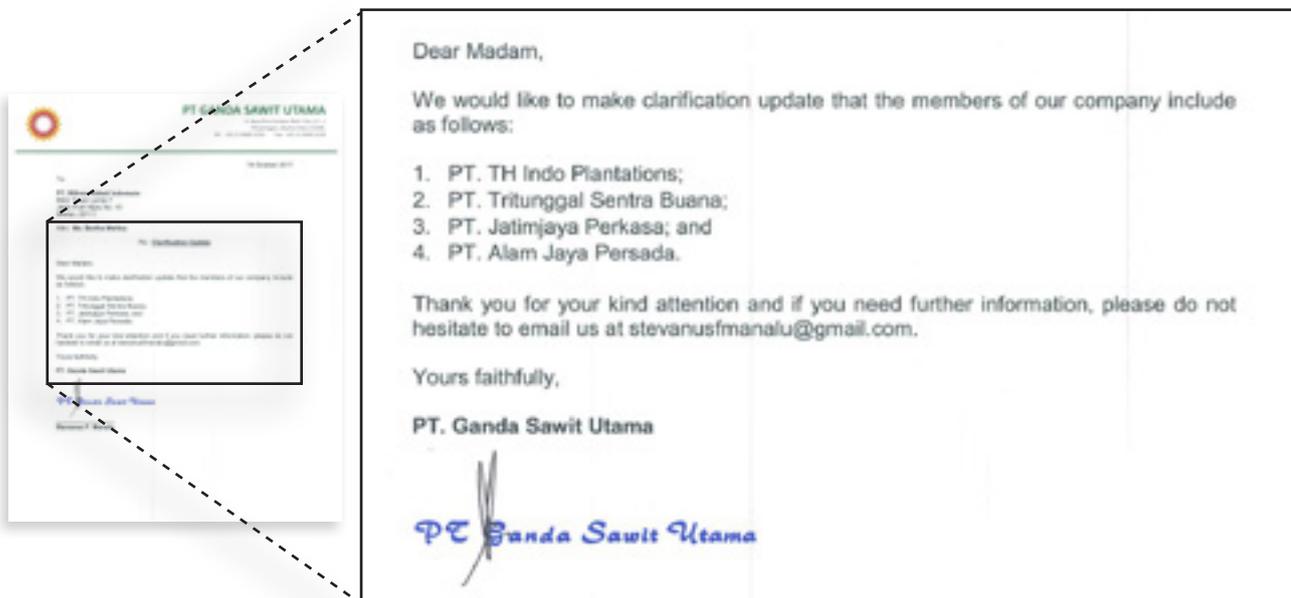
One company that Wilmar presented as being owned by PT GSU, on the basis of a letter from PT GSU itself, was not owned by PT GSU at all: in fact, PT TSB was 50% owned by Wilmar

Plantations (Mauritius) Ltd. This means that Wilmar was passing on information that it must have known was false.

Greenpeace wrote to Wilmar in May 2018 requesting an explanation. By the time Wilmar replied, some two weeks later, it claimed to have sold its stake in the company to Achieve Goals Ltd,<sup>127</sup> a company registered in the British Virgin Islands and nominally run by a procurement manager of PT AMS – at least according to his LinkedIn profile.<sup>128</sup> Official registry profiles for PT TSB do not mention Achieve Goals Ltd, but indicate that Wilmar's share in the company was transferred to Gama holding company PT PPM on 17 May 2018 – six days after Greenpeace's inquiry.

Wilmar's refusal to acknowledge that it sources palm oil from Gama leaves its customers unwitting recipients of dirty palm oil unless they or their implementation partners perform some modicum of due diligence. For example, Bunge Loders Croklaan's traceability data (admittedly wrongly) identifies Wilmar as the parent company of PT Citra Riau Sarana,<sup>129</sup> even though Wilmar's own data lists PT CRS as both the mill name and company name.<sup>130</sup> Similarly, in their most recent mill lists Bunge Loders Croklaan and Olam both list PT Patiware and PT Jatimjaya Perkasa as suppliers; they both identify 'Ganda' as the parent company,<sup>131</sup> even though Wilmar's own traceability data fails to include accurate parent company information.<sup>132</sup> Indeed, when Greenpeace International wrote to brands in April 2018 to confirm which producers were in their supply chains, many failed to identify Gama at all.

When a supplier is neither transparent nor honest, consumer companies seeking to implement their NDPE policies face additional, unnecessary challenges.



## GAMA AND WILMAR'S MARKET LINKS



Wilmar International supplies palm oil to many of the world's palm oil traders. Many brands buy palm oil directly from Wilmar, as well as being supplied with it by these traders.

Greenpeace analysed the supply chain data<sup>133</sup> of traders with publicly available traceability dashboards: AAK,<sup>134</sup> Apical/Asian Agri,<sup>135</sup> Bunge Loders Croklaan (previously IOI Loders Croklaan),<sup>136</sup> Cargill,<sup>137</sup> Golden Agri-Resources (GAR),<sup>138</sup> Musim Mas,<sup>139</sup> Olam,<sup>140</sup> Sime Darby<sup>141</sup> and Wilmar.<sup>142</sup>

Greenpeace also analysed the most recent traceability information that major brands have disclosed publicly: Colgate-Palmolive,<sup>143</sup> Ferrero,<sup>144</sup> General Mills,<sup>145</sup> Hershey,<sup>146</sup> Kellogg's,<sup>147</sup> Mars,<sup>148</sup> Mondelez,<sup>149</sup> Nestlé,<sup>150</sup> PepsiCo,<sup>151</sup> Procter & Gamble,<sup>152</sup> PZ Cussons,<sup>153</sup> Reckitt Benckiser<sup>154</sup> and Unilever<sup>155</sup> all make this information available.<sup>156</sup>

Analysis by Greenpeace revealed that almost all companies with Wilmar International as a supplier were being supplied palm oil from Gama mills, though some brands also received palm oil from Gama mills via other traders/suppliers.

Brands that did not fully disclose their suppliers or mills and thus whose relationship to Wilmar and Gama mills cannot be confirmed include Danone, Johnson & Johnson, Kraft Heinz, L'Oréal<sup>157</sup> and Smucker's.

### BRANDS SUPPLIED BY WILMAR INTERNATIONAL

Brands that report sourcing from Wilmar include Colgate-Palmolive, Hershey, Kellogg's, L'Oréal, Mars, Mondelez, Nestlé, PepsiCo, Procter & Gamble, PZ Cussons, Reckitt Benckiser and Unilever.

General Mills reports sourcing from ADM (a Wilmar-related company).<sup>158</sup>

Ferrero had been supplied by Olenex (an ADM-Wilmar joint venture) at least as recently as the second half of 2017, but has since ended that supply relationship.<sup>159</sup>

### BRANDS RECEIVING PALM OIL FROM GAMA MILLS

According to public reporting, Colgate-Palmolive, General Mills, Hershey, Kellogg's, Mars, Mondelez, Nestlé, PepsiCo, Procter & Gamble, PZ Cussons, Reckitt Benckiser and Unilever all received palm oil from Gama mills in 2017.

### TRADERS SUPPLIED BY WILMAR INTERNATIONAL<sup>160</sup>

Traders that report sourcing from Wilmar include AAK, Bunge Loders Croklaan, Cargill, IOI, KLK, Louis Dreyfus Corporation, Mewah, Olam and Sime Darby.

First Resources, HSA/PIL and Keck Seng did not respond to Greenpeace's request for confirmation of their trading relationships.

### TRADERS RECEIVING PALM OIL FROM GAMA MILLS

Of the traders with publicly available dashboards containing supply mill information, AAK, Apical, Bunge Loders Croklaan, Cargill, GAR, Musim Mas, Olam, Sime Darby and Wilmar are identified as receiving palm oil from Gama mills in 2017.



***‘A corporate group is a set of individuals or legal entities in the plantation sector that are connected to each other through ownership, management and/or financial links.’<sup>161</sup>***

19 December 2017,  
PT Agriprima Cipta Persada,  
7°31'3.618" S 140°30'36.264" E  
©Sukarno/Greenpeace

INDONESIAN MINISTRY OF AGRICULTURE, 2013 REGULATION

©Sukarno/Greenpeace



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# WILMAR AND GAMA: ONE GROUP WITH TWO FACES

Wilmar and Gama are two sides of the same coin – at least within Indonesia. Sitorus has extensive investment ventures with both Kuok and Ganda. The very close family ties and management overlap make Gama and Wilmar’s Indonesian operations, and arguably Gama and Wilmar International, related parties,<sup>163</sup> in the legal as well as the familial sense. The pairing also satisfies the definition of a group enshrined in both Indonesian law<sup>164</sup> and the RSPO’s membership rules.<sup>165</sup>

Accordingly, brands, traders and the RSPO should hold Wilmar accountable for what happens in Gama’s concessions. Indeed, it is the artificial gap between the two that allows Sitorus and his family to continue profiting from deforestation without getting Wilmar’s hands dirty.

Wilmar International is keeping its customers in the dark about their exposure to deforestation by Gama, which is itself intimately connected to Wilmar. This deception undermines the efforts of Wilmar’s customers to implement their own NDPE policies properly. Meanwhile, for Sitorus and his family, it ensures that trade – and money – continues flowing from the global market to the Gama side of the empire.

The question Wilmar must answer is whether this policy is being pursued with the full approval of Wilmar International CEO Kuok Khoon Hong – or whether Wilmar’s Indonesian operation, under the influence of Kuok’s longtime business partner, Martua Sitorus, has gone rogue and is being used by Sitorus and his relatives to further their own business interests.

Either way, companies trading with Wilmar cannot let this deceit go unchallenged.

The palm oil industry in general – and consumer brands in particular – continues to treat instances of deforestation as the exception, not the norm. But as this case shows, the industry is rotten at the core. If companies are to comply fully with their NDPE policies by 2020, there must be radical reform of the global palm oil trade.

**‘Control means:**

**(a) having management control which includes the ability to direct, instruct or manage business activity or administration of an Entity whether by having the ability to influence the board, management of an Entity through shareholding, stock ownership or by contractual or operational arrangement;**

**(b) in accordance with whose directions, instructions or wishes an Entity is accustomed or is under an obligation, whether formal or informal, to act in relation to a Parent’s direction, instructions or wishes.<sup>162</sup>**

RSPO MEMBERSHIP RULES 2016

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# GROUP RESPONSE

**Prior to publishing this report, Greenpeace wrote to Gama, Wilmar International and named individuals to offer them an opportunity to comment on these findings. Full copies of the responses received can be found in Annex 1.**

## **KUOK KHOON HONG, WILMAR CEO**

It is clear from his response that Wilmar CEO Kuok Khoon Hong wishes to dissociate Wilmar from Gama, but remains unaware (or in denial) of the gulf between what Wilmar is doing and what needs to happen to finally break the group's ties to deforestation – something he first promised to do in 2013.

Kuok acknowledges that 'Gama' is the informal name given to the group of companies controlled by Sitorus and family. He acknowledges that senior executives within Wilmar are members of the Sitorus family and also control Gama palm oil companies.

He does not acknowledge that this overlap poses a conflict of interest – even though individual senior executives within Wilmar hold positions with responsibility for deciding which Indonesian companies supply the oil Wilmar trades.

Kuok helpfully acknowledges that Wilmar's failure to implement its NDPE policy led it to trade palm oil from Gama despite Gama's involvement in deforestation. He commits to establish and chair an NDPE Action Committee 'to take and review decisions about suppliers'.

However, as this case shows, Wilmar still fails to monitor its suppliers across all of their operations – especially concessions in frontier areas from which it does not yet source – to determine whether they comply with its policy or are destroying forests.

Indeed, Kuok admits that Wilmar failed to identify the extent of Gama operations, that 'there should have been more stringent oversight on the ownership verification process' and that Wilmar still does not know which companies are part of Gama: 'we are still awaiting the specific list of companies within Gama'.

Given that Gama is not the only problematic producer group in Wilmar's supply chain, it is reasonable to fear that Wilmar has similarly failed to perform due diligence on many other suppliers.

Kuok's claim that 'we purchased oil only from companies who are in compliance with our [NDPE] policy' is factually incorrect. It suggests Wilmar's CEO remains unaware of the scale of the problem his company faces and reluctant to implement the profound supply chain reforms needed to meet market demand for NDPE palm oil by 2020.

Kuok concludes with a commitment that Wilmar will not 'buy from any company that cannot prove to our satisfaction that they do not belong to Gama'. While this action is necessary, it is inadequate.

If Wilmar is serious about sustainability, it must not buy from any producer group that cannot prove it is not destroying forests. The first step is to require full disclosure from all suppliers of which companies are under their control, including publication of maps for every one of their concessions, and to exclude those that refuse to be transparent.

**Greenpeace stands by the findings of this report.**

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***'In order to be absolutely sure that that [sic] there is no violation of Wilmar's NDPE policy, we have decided to cease sourcing from all the companies that we have a commercial relationship with that are allegedly associated with Gama Corp as listed in your letter, with immediate effect, until we receive satisfactory confirmation of ownership information. Wilmar will commit not to buy from any company that cannot prove to our satisfaction that they do not belong to Gama Corp.'***

FAX TO GREENPEACE FROM KUOK KHOON HONG, 20 JUNE 2018

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## **ANDY INDIGO, GAMA PLANTATION**

Andy Indigo's response on 20 June 2018, on behalf of Gama, is less revealing.

The letter, on 'Gama Plantation' headed paper, represents Gama as a group. However, Andy Indigo ignores Greenpeace's request for a complete list and maps of Gama's palm oil operations.

Andy Indigo appears to commit to an NDPE policy, but provides no substance.

He lists 20 plantation companies that will adhere to a 'moratorium on land clearing and NDPE policy.' This is only just over half of the Gama plantation companies and other operations that Greenpeace has identified. Notably, the list does not include the two Papuan concessions where Greenpeace documented clearance in April 2018, PT Agriprima Cipta Persada and PT Agrinusa Persada Mulia.

In fact, while the 20 concessions make up three-quarters of Gama's identified landbank (some 280,000ha), they contain just 11,000ha of forest. By contrast, the concessions not covered by the 'moratorium' or NDPE policy, covering approximately 100,000ha, contain almost 30,000ha of forest.

In other words, Andy Indigo is offering to end deforestation – but mainly in concessions that have no forest left to clear.

**Greenpeace stands by the findings of this report.**

10 November 2008, Dumai:  
Greenpeace activists block a  
tanker loaded with 27,000 metric  
tonnes of crude palm oil destined  
for Wilmar's refineries in The  
Netherlands. The action calls  
for an end to deforestation and  
peatland destruction for palm oil.  
©Novis/Greenpeace

20 October 2013,  
PT Agrindo Indah Persada,  
1°53'53.5"S 102°4'31.3"E:  
Greenpeace activists challenge  
Wilmar after documenting  
deforestation of tiger habitat  
in its PT AIP concession in Jambi.  
©Hilton/Greenpeace



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# TIME FOR ACTION

Companies must start by taking control of their supply chains, with robust monitoring of producer groups and a clear protocol for handling non-compliant suppliers. A fuller description of the actions companies must take is contained in Greenpeace's *Moment of Truth* report.<sup>166</sup>

Given the scale of deception outlined in this report, traders and brands have no choice but to suspend all trade with companies controlled by Martua Sitorus and his family, including Wilmar, Gama and the various mills and plantations under their control.

Trade should remain suspended until Wilmar addresses the violations of its NDPE policy, by:

- **taking responsibility for all deforestation and peatland clearance in Gama concessions after 5 December 2013;**
- **publishing a timebound plan to restore all areas developed in violation of Wilmar's NDPE policy;**
- **assuming operational control of the relevant Gama concessions to ensure compliance with this restoration plan and Wilmar's NDPE policy;**
- **publishing concession maps for all producer groups within its supply chain, as a first step towards only trading palm oil from producer groups that have been independently verified as compliant with its NDPE policy by 2020.**



19 December 2017,  
PT Agrinusa Persada Mulia,  
7°28'24.024"S 140°45'35.273"E:  
©Ifansasti/Greenpeace



**ANNEX ONE:**  
**FULL RESPONSE TO**  
**GREENPEACE FROM**  
**KUOK KHOON HONG**  
**AND ANDY INDIGO**

20-JUN-2018 20:11

P. 01/18

**Wilmar International Limited**

Co. Reg. No. 199904785Z

56 Neil Road, Singapore 088830

Tel: (65) 6216 0244

info@wilmar.com.sg

www.wilmar-international.com



20 June 2018

**Greenpeace International**

Njalsgade 21G, 2. Sal.

2300 København S

Denmark

**PRIVATE AND CONFIDENTIAL**

BY FAX: +31 20 203 1039

**Greenpeace International**

Otho Heldringstraat 5

1066 AZ, Amsterdam

Netherlands

Attn : Daniel Simons

Legal Counsel Communications

Dear Sirs

Re : Gama group of companies

I refer to your letter of 18 June 2018 . Thank you for reaching out to us and giving us an opportunity to comment on a proposed Greenpeace International report on Wilmar's operations, ahead of its publication.

With regard to the statement in your letter that Wilmar International Limited ("Wilmar") and Gama should be considered as one group, I would like to point out that this is factually incorrect. Gama Group or Gama Corp is not a legal entity. It is a name given to a group of companies owned by Mr Ganda and his brother, Mr Martua Sitorus. Wilmar has no shareholding interest in any of the companies in this group, which for ease of reference, we will call them "Gama Corp". This is a fact that can be verified by Wilmar's auditors.

There is also no extensive overlap in management between Wilmar and Gama Corp or control between Wilmar and Gama Corp. Mr Martua Sitorus, who co-founded Wilmar with me, was never the CEO of Wilmar. Mr Sitorus, who is not related to me, was the Executive Deputy Chairman of Wilmar but ceased to be so on 1 April 2017, when he became a non-independent, non-executive director of Wilmar. Please refer to the attached Wilmar announcement dated 31 March 2017. Mr Martua Sitorus no longer exercises any executive function or responsibility in Wilmar.

Mr Martua Sitorus also ceased to be a substantial shareholder of Wilmar on 2 September 2016 when his shareholding interest in Wilmar dropped below 5%. Please refer to the attached Wilmar announcement dated 6 September 2016. Mr Sitorus currently holds a 1.82% interest only in Wilmar. Please refer to the attached Wilmar announcement dated 23 November 2017.

It is important to state that Wilmar has no control, management or otherwise, over the Gama Corp. Although Mr Hendri Saksti and Mr Darwin Indigo are senior executives of the Wilmar Group, they do not sit on the Wilmar Board, which is the body that sets the policy and overall direction for the Wilmar Group. Neither Mr Saksti nor Mr Indigo have decision-making power when it comes to Wilmar's sustainability policy. The fact that they are relatives of Mr Sitorus, does not mean that Gama Corp exercises management control over Wilmar or that Wilmar exercises management control over Gama Corp. Gama Corp and Wilmar operate independently of each other and consequently, Wilmar cannot be held accountable for the actions or non-action of Gama Corp. However to demonstrate how seriously we take this issue and to ensure strict compliance with our NDPE policy, Wilmar will set up a NDPE Action Committee in both Indonesia and Singapore to take and review decisions about suppliers and to report on progress with grievances. The Committee will be chaired by me and no person related to Gama Corp will be a member of the Committee to ensure 100% arm's length decision-making.

With regard to the purchase of palm oil from companies suspected to be affiliated with Gama Corp, we acknowledge that there should have been more stringent oversight on the ownership verification process in respect of these companies by Wilmar. Specifically with regard to the allegations of non-compliance by Gama Corp which was presented in a case study shared by Greenpeace in December 2017, we would like to make it clear that the 3 companies named, i.e. PT Graha Agro Nusantara, PT Agrinusa Persada Mulia, and PT Agriprima Cipta Persada, are not suppliers to Wilmar. We did not purchase palm oil from these companies. In compliance with our NDPE policy, we purchased oil only from companies who are in compliance with our policy but some of these companies were alleged to be affiliated with Gama Corp. We checked with our supplier, PT Ganda Sawit Utama and their response was that they are not linked to Gama Corp. Nevertheless, we initiated a meeting between a representative of Gama Corp and the NGO AidEnvironment on 30 April 2018. A formal letter was subsequently sent to Gama Corp, and 6 other supplier companies that were identified in the December 2017 case study as allegedly being linked to Gama Corp, requesting a full list of companies within Gama Corp, and that they commit immediately to a moratorium on land clearing activities and adoption of the NDPE policy. On 11 June 2018, all the companies responded positively with commitments. However, we are still awaiting the specific list of companies within Gama Corp as part of their action plan and application of the commitments.

We have been in intense communication with Gama Corp on their own NDPE commitment and have even asked our former COO, Mr Teo Kim Yong to assist them in this respect.

In order to be absolutely sure that there is no violation of Wilmar's NDPE policy, we have decided to cease sourcing from all the companies that we have a commercial relationship with that are allegedly associated with Gama Corp as listed in your letter, with immediate effect, until we receive satisfactory confirmation of ownership information. Wilmar will commit not to buy from any company that cannot prove to our satisfaction that they do not belong to Gama Corp.

Meanwhile, Wilmar continues to implement its NDPE policy and takes any non-compliance seriously. Based on information received via grievances and information from stakeholders, we have, up to 19 June 2018, logged 44 grievance cases publicly on our dashboard. Of these 44 cases, and not including the very recent suspension decision on Gama Corp, 10 grievance cases have resulted in suspensions of business relations. The remaining grievance cases are progressing with moratoriums in place (for deforestation cases), or are subject to time-bound action plans, and over which we are actively monitoring progress. For detailed information on our grievances, please refer to <http://www.wilmar-international.com/sustainability/grievance-procedure/grievance-list-with-progress-updates/>.

In 2013, Wilmar took the lead on the sustainability front by coming up with a NDPE policy. We were not compelled to do so, but decided to launch this initiative because we believe that sustainability is the only viable way to operate and grow the palm business. It is our intention to maintain our leadership position and you have my assurance that Wilmar will strictly enforce its NDPE policy going forward. We welcome dialogue with Greenpeace and any NGO to improve our NDPE implementation.

Yours faithfully  
WILMAR INTERNATIONAL LIMITED



KUOK Khoo Hong  
Chairman & CEO

Enc.



**WILMAR INTERNATIONAL LIMITED**  
 (Incorporated in the Republic of Singapore)  
 (Company Registration No. 199904785Z)

**ANNOUNCEMENT**

**RE-DESIGNATION OF EXECUTIVE DEPUTY CHAIRMAN  
 TO NON-INDEPENDENT NON-EXECUTIVE DIRECTOR**

Wilmar International Limited (the "Company" or "Wilmar") wishes to announce that Mr Martua Sitorus will step down from his position as Executive Deputy Chairman and relinquish his role as Executive Director of the Company on 31 March 2017 to focus his attention on his family business.

Mr Martua Sitorus, aged 57, a co-founder of the Company, was appointed Chief Operating Officer and a member of the Wilmar Board since 14 July 2006. Mr Sitorus will continue to serve on the Wilmar Board as a Director and will be re-designated as a Non-Independent Non-Executive Director with effect from 1 April 2017.

Consequent upon Mr Martua Sitorus' decision to step down from his position as Executive Deputy Chairman and Executive Director of the Company on 31 March 2017, the composition of the Wilmar Board and following Wilmar Board Committees, with effect from 1 April 2017, will be as follows:

Executive Directors

1. Mr Kuok Khoo Hong (Chairman and Chief Executive Officer)
2. Mr Pua Seck Guan (Chief Operating Officer and Executive Director)

Non-Independent Non-Executive Directors

3. Mr Martua Sitorus
4. Mr Kuok Khoo Ean
5. Mr Kuok Khoo Hua
6. Mr Juan Ricardo Luciano
7. Mr George Yong-Boon Yeo

Independent Non-Executive Directors

8. Mr Yeo Teng Yang
9. Mr Tay Kah Chye
10. Mr Kwah Thiam Hock
11. Professor Kishore Mahbubani

*(Note: Total number of Directors remains unchanged i.e. 11).*

Wilmar Executive Committee

1. Mr Kuok Khoo Hong (Chairman)
2. Mr Pua Seck Guan

Wilmar Share Purchase Committee

1. Mr Kuok Khoo Hong (Chairman)
2. Mr Pua Seck Guan

The Board would like to record its thanks and appreciation to Mr Sitorus for his dedicated service and valuable contributions to the Company during his tenure as Chief Operating Officer, Executive Deputy Chairman and Executive Director of the Company.

**By Order of the Board**  
**WILMAR INTERNATIONAL LIMITED**  
 31 March 2017

# ANDY INDIGO'S RESPONSE



## GAMA PLANTATION

Gama Tower 46<sup>th</sup> floor  
Jl. H.R. Rasuna Said, Karet Kuningan  
Kav C-22 Jakarta Selatan 12940

Jakarta, 20 June 2018

Dear Mr. [REDACTED]

### Re : Greenpeace International Publication

I am writing in respond to some of the points you raise in your letter dated 18 June 2018. First of all, please allow me to thank you for giving us the chance to comment and respond before you publish the report.

I would like to clarify that we are an independent company, not related to Wilmar International Ltd. The only relation we have with them is that we are supplying our palm oil products to them.

We would like to highlight that, Wilmar had approached us a few time and the latest was a meeting on held in Singapore on 30 April 2018 between ourself, Wilmar and Aidenvironment, where we had agreed to work toward the Implementation of NDPE Policy in all our companies.

As a follow up to the meeting, we had initiated and met with all representative from relatives, families and Joint Venture partners to infrom them about our intention to adopt NDPE Policy in all our companies, regardless of the shareholdings.

Most of the repretatives had agreed to the moratorium on land clearing and the implementation of the policy. Currently, we are in the process of restructuring and consolidating all our group of companies together with all related parties.

The representatives that had affirmed their commitment to Moratorium on land clearing and NDPE policy are PT Patiware, PT Citra Mahkota, PT Intitama Berlian Perkebunan, PT Ganda Sawit Utama, PT Jatimjaya Perkasa, PT TH Indo Plantations, PT Alam Jaya Persada, PT Karya Agung Megah Utama, PT Sumatera Unggul Makmur, PT Putralirik Domas, PT Nusa Jaya Perkasa, PT Sentosa Asih Makmur, PT Bumi Alam Sentosa, PT Wawasan Kebun Nusantara, PT Wahana Karya Sejahtera Mandiri, PT Citra Riau Sarana, PT Graha Agro Nusantara, PT Berkat Sawit Utama, PT Perkebunan Anak Negeri Pasaman, PT Agro Alam Nusantara and PT Swadaya Indopalma.

Furthermore, we would like to convey that PT Gandaerah Hendana and PT Inecda are not under our management since we are only minority shareholder. Despite that, we will ensure that they agree to comply with our policy.

With this letter, I would like to affirm you that I am very serious about the adoption of NDPE Policy in all our companies, regardless of the shareholdings. To assure you about our commitment, I will cease all exsiting land clearing in all our consessions until we implement our policy.

I am looking forward to continue this positive communication and engagement with you and I am looking forward to your support and guidance so that we can work together in the most sustainable way.

Thank you.

Yours truly,

Andy Indigo



PT Berkas Sawit Utama (Ex-PT Asiatic Persada)	X								X	X						Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd, Family
PT Bumi Alam Sentosa	X								X	X						Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd
PT Citra Mahkota	X															Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd
PT Citra Riau Sarana	X								X	X						Capital Ocean Ventures Ltd, Team Ventures Investments Ltd, Silvery Ltd, Family
PT Energi Unggul Persada																Capital Ocean Ventures Ltd, Family
PT Gandaerah Hendana																Athens City Holdings, Family Other (JV)
PT Grana Agro Nisantara	X								X	X						Capital Ocean Ventures Ltd, Family
PT Indokahun Unggul PT Inecda																Capital Ocean Ventures Ltd, Family
PT Intitama Berlian Perkehuman	X															Capital Ocean Ventures Ltd, Family
PT Intitama Perkehuman Prima																Capital Ocean Ventures Ltd, Family
PT Jammer Tulen																Capital Ocean Ventures Ltd, Family
PT Jatimjaya Perkasa	X															Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd, Family
PT Karya Agung Megah Utama	X															Athens City Holdings Limited
PT Karya Palmalindo Abadi																Family
PT Maju Perkasasawit																Family
PT Nusa Jaya Perkasa	X															Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd, Family
PT Patiware	X															Capital Ocean Ventures Ltd, Family
PT Patiware Satu																Capital Ocean Ventures Ltd, Family
PT Perkebunan Anak Negeri Pasaman	X															Capital Ocean Ventures Ltd, Family
PT Putralirik Domas	X															Capital Ocean Ventures Ltd
PT Rajawali Jaya Perkasa																Capital Ocean Ventures Ltd
PT Sawit Unggul Agro Niaga																Capital Ocean Ventures Ltd
PT Sentosa Asih Makmur	X															Capital Ocean Ventures Ltd
PT Serdang Hulu																Capital Ocean Ventures Ltd
PT Subur Sawit																Capital Ocean Ventures Ltd
PT Platinum																Capital Ocean Ventures Ltd
PT Swadaya																Capital Ocean Ventures Ltd
Indopalma																Capital Ocean Ventures Ltd
PT Sumatera Unggul Makmur	X															Capital Ocean Ventures Ltd
PT TH Indo																Capital Ocean Ventures Ltd
Plantations																Capital Ocean Ventures Ltd
PT Tritunggal Sentra Buana																Capital Ocean Ventures Ltd
PT Wahana Karya Sejahtera Mandiri	X															Capital Ocean Ventures Ltd
PT Wawasan Kebun Nisantara	X															Capital Ocean Ventures Ltd

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# REFERENCES





Clockwise from opposite:

1 April 2018, Papua:  
Rainbow near the river  
Digul in southern Papua.  
©Ifansasti/Greenpeace

26 March 2018,  
Merauke, 8°10'56.02"S  
138°40'50.54"E:  
Primary forest near the river  
Digul in southern Papua.  
©Ifansasti/Greenpeace

14 September 2013,  
Pangkalan Bun: Orphaned baby  
orang-utans at the Orangutan  
Foundation International Care  
Center in Central Kalimantan.  
©Ifansasti/Greenpeace





- 1 Kuok KH (2016)
- 2 Wilmar International Ltd (2013d) p1
- 3 TFT Transparency Hub website 'Wilmar'
- 4 Wilmar International Ltd (2013b)
- 5 Wilmar International Ltd (2013d)
- 6 Wealth-X website 'Khoo Hong Kuok'
- 7 Forbes website 'Profile: Kuok Khoo Hong'
- 8 Wilmar International Ltd (2018b) p26
- 9 See Wilmar International Ltd & ING Bank (2017). In June 2018 Wilmar announced a second loan linked to its sustainability performance: see Straits Times (2018).
- 10 Wilmar International Ltd (2017a) p3
- 11 Suhendra (2016)
- 12 For example, in 2011 Kuok and Sitorus bought the Aviva Tower in London (see White A (2015)), and as of 2012 both Kuok and Sitorus, along with HPR Y Holdings and Burlingham International, were substantial shareholders in Yanlord Land Group, a Shanghai-based property development company (see Yanlord Land Group Ltd (2013) p123). As of 2012, both Kuok and Sitorus were involved in Australia's Whitehaven coal mine through their holding companies (see Conde J (2012)).
- 13 Wilmar International website 'Who we are: Kuok Khoo Hong'
- 14 Wilmar International website 'Who we are: Martua Sitorus'
- 15 Wilmar International website 'Who we are: Martua Sitorus'
- 16 See Wilmar International annual reports, available at <http://www.wilmar-international.com/library/corporate-information/accordion-annual-reports/>, and Wilmar International Ltd (2013a).
- 17 Wilmar International Ltd (2017a) p16
- 18 Sitorus was redesignated as a non-independent non-executive director on the Wilmar board as of 1 April 2017. Source: Wilmar International Ltd (2017b).
- 19 Wilmar International website 'Who we are: Martua Sitorus'
- 20 Notably Hendri Saksti and Darwin Indigo; see below.
- 21 Source: corporate registry profiles. Citations in this report refer to documents obtained by Greenpeace in early June 2018.
- 22 Wilmar International Ltd (2011) p2
- 23 Wilmar International Ltd (2018b) p24
- 24 Corporate registry profiles show Hendri Saksti owns 95% of PT Semesta Buana Gemilang, which owns 65% of PT Agro Alam Nusantara.
- 25 Pontianak Post (2016)
- 26 Corporate registry profile
- 27 Corporate registry profile
- 28 Infosawit (2017); see also Singapore Exchange (2015b)
- 29 Singapore Exchange (2015b)
- 30 S&G Biofuel Ltd. Source: corporate registry profile.
- 31 Suara Pusaka (2018)
- 32 Corporate registry profiles
- 33 Corporate registry profiles of PT Agro Alam Nusantara, PT Agro Lintas Nusantara, PT Alam Jaya Persada, PT Berkat Sawit Utama, PT Bumi Alam Sentosa, PT Graha Agro Nusantara, PT Intitama Berlian Perkebunan, PT Intitama Perkebunan Prima, PT Jammer Tulen, PT Karya Agung Megah Utama, PT Maju Perkasa Sawit, PT Nusa Jaya Perkasa, PT Patiware, PT Patiware Satu, PT Putra Lirik Domas, PT Rajawali Jaya Perkasa, PT Sentosa Asih Makmur, PT Serdang Hulu, PT Subur Sawit Platinum, PT Sumatera Unggul Makmur, PT Wawasan Kebun Nusantara and their parent companies
- 34 Corporate registry profiles
- 35 Corporate registry profiles
- 36 Corporate registry profiles list Athena City Holdings Ltd, Bonoto Investments Ltd, Capital Ocean Ventures Ltd, Festive Investments Ltd, Fullest Holdings Ltd, HPR Investments Ltd, Prime Track Ltd, Rise Glory Interprises Ltd, Silvery Ltd and Team

- Ventures Investments Ltd. Wilmar also refers to Achieve Goals Ltd as the new owner of one company (PT Tritunggal Sentra Buana; see Wilmar International Ltd (2018a) p2), though this is not reflected in the registry profiles.
- 37 Corporate registry profiles
- 38 Corporate registry profiles
- 39 Corporate registry profiles
- 40 Corporate registry profiles of PT Gandaerah Hendana and PT Inecda and their parent companies, and Samsung C&T Corporation and Subsidiaries (2017) p23
- 41 The mill has not been able to obtain a plantation business licence (IUP). Indonesian plantation law requires mill owners to source at least 20% of their palm fruit from their own plantations. A presentation from January 2018 that appears to have been written by a company official explains the situation from the company's perspective; see <https://prezi.com/vynbsn9-zzf2/ptsuan/?webgl=0>.
- 42 See eg Hadi S (2018), an example of a letter used in recruitment on university campuses, which states that 'Gama Plantation is an oil palm plantation and processing group, located in Riau, Jambi, Palembang, West Kalimantan, East Kalimantan and Papua'.
- 43 Times Indonesia (2017)
- 44 Batam News (2018)
- 45 Tribun Pontianak (2017)
- 46 Together with representatives of Peter Sondakh's Rajawali Group and a Malay-owned conglomerate. Source: International Palm Oil Monitor (2018). See also Barrock J (2017).
- 47 The Edge Malaysia (2018)
- 48 PT Wilmar Cahaya Persada and PT Wilmar Nabati Indonesia are both located on floor 12 of Multivision Tower. Corporate registry profiles show that several Gama holding and plantation companies, including PT AMS, occupy floors 10 and 11.
- 49 Compliance Advisor/Ombudsman (2009) p17
- 50 The concession is also known as PT Jatim Jaya Perkasa. See Wilmar International Ltd (2013c).
- 51 Greenpeace International (2013) p18
- 52 Wakker E, Miettinen O & Zulfahmi (2004)
- 53 Klawitter N (2014)
- 54 Corporate registry profile
- 55 Kuok Khoon Hong has declared an interest in HPR Investments Ltd, which holds a 34% stake in PT PANP. Source: Singapore Exchange (2018). Bloomberg records Kuok Khoon Hong as co-owner of HPR Investments Ltd; see Bloomberg website 'Company overview of HPR Investments Limited'.
- 56 Martua Sitorus has declared an interest in Bonoto Investments Ltd, which owns 33.5% of PT PANP. Source: Singapore Exchange (2015a). Bloomberg records Martua Sitorus as co-owner of Bonoto Investments Ltd; see Bloomberg website 'Company overview of Bonoto Investments Limited'.
- 57 Corporate registry profiles
- 58 According to his Facebook profile; see <https://www.facebook.com/chusunul.nurtjahja> (accessed 14 June 2018).
- 59 Corporate registry profiles
- 60 See <https://docslide.net/documents/general-information-update-1-juli-2015.html>.
- 61 See eg <https://id.linkedin.com/in/jefri-siagian-4408a011b>, <https://id.linkedin.com/in/marbuono-abu-91a31ab1> and <https://id.linkedin.com/in/khairuddin-simatupang-4813b753> (accessed 14 June 2018).
- 62 Kurniati D (2017)
- 63 Saturi S (2013)
- 64 RSPO website 'Case tracker: BT Bumi Sawit Kencana II'
- 65 Forest Peoples Programme (2018)
- 66 Kurniati D (2017)
- 67 Amnesty International (2016); see also Joshi S (2017)
- 68 Kiezebrink V (2017)
- 69 Corporate registry profiles, SOMO (2017) p13
- 70 SOMO (2017) pp12-4
- 71 SOMO (2017) pp22-35
- 72 RSPO website 'Case tracker: PT Asiatic Persada'
- 73 Forest Peoples Programme (2011)
- 74 SOMO (2017) p12
- 75 At the time of the sale, Gama was known as Ganda Group.
- 76 Wilmar International Ltd (2014b) p41
- 77 Krishnan R (2013)
- 78 SOMO (2017) pp26-9
- 79 SOMO (2017) pp29-31
- 80 Wilmar International Ltd (2014b) p41
- 81 SOMO (2017) p15
- 82 See supply chain data for the period January to December 2017: Wilmar International Ltd (2018c,d,e,f,g).
- 83 SOMO (2017) p13
- 84 Corporate registry profile
- 85 PT Perkebunan Prima Manunggal's main shareholder was PT Wahana Karya Agrinusa, whose main shareholder was PT Agro Ganda Indigo. This company had as its main shareholders PT Wahana Indigo (50%) and PT Ganda Indigo Nusantara (50%), both of which were jointly owned by Andy Indigo and Jacqueline Sitorus. Source: SOMO (2017) p13.
- 86 WWF Indonesia (2013)
- 87 At the time of the sale, Gama was known as Ganda Group.
- 88 Wilmar International Ltd (2014a)
- 89 As revealed by a November 2017 investigation by Tempo and Eyes on the Forest, which followed a truck carrying palm fruit from the national park to the PT CRS mill. Source: Trianita L (2018).
- 90 Wilmar International Ltd (2018g)
- 91 Greenpeace mapping analysis
- 92 Benny Djuarsa and Johannes, both managers of Wilmar subsidiary PT Wilmar Cahaya Indonesia at the time the concessions were established; see case studies below.
- 93 Corporate registry profiles
- 94 Krisno O (2017)
- 95 Greenpeace mapping analysis of satellite imagery
- 96 Corporate registry profiles
- 97 Greenpeace mapping analysis
- 98 Irawan Y (2015) and Arlinus Z (2015)
- 99 foresthints.news (2018)
- 100 awasMIFEE (2018)
- 101 foresthints.news (2018)
- 102 Wright S & Karmini N (2017)
- 103 Tribun Pontianak (2018)
- 104 Benny Djuarsa is described on this site as management of PT Wilmar Cahaya: <http://pupukmahkota.co.id/news/temu-tani-brebes-092017.html>. Johannes (his full name) is described on this site as management: <http://britama.com/index.php/2012/10/sejarah-dan-profil-singkat-ceka/>. Ownership information was found in corporate registry profiles.
- 105 Redaksi (2009)
- 106 SK No. 42, tgl 22-02-2010
- 107 Corporate registry profiles
- 108 Corporate registry profiles
- 109 Corporate registry profiles
- 110 Greenpeace mapping analysis based on official Ministry of Environment and Forestry land cover data

- 111 Asrida E (2018)
- 112 Greenpeace mapping analysis; see also Suara Pusaka (2018)
- 113 Suara Pusaka (2018)
- 114 Basik-Basik M (2016)
- 115 Ngelia Y (2016)
- 116 Koalisi Organisasi Masyarakat Sipil (2016)
- 117 awasMIFEE (2017)
- 118 Benny Djuarsa and Johannes. Source: corporate registry profiles.
- 119 Corporate registry profiles
- 120 Greenpeace mapping analysis of satellite imagery; see also Suara Pusaka (2018)
- 121 Interview with a community leader from Bupul village (name withheld for security reasons), August 2017
- 122 Paino C (2017)
- 123 Government of Indonesia (2001)
- 124 These include PT Berkat Sawit Utama (Sei Kandang), PT Citra Riau Sarana (Teso 1, 2, 3), PT Graha Agro Nusantara, PT Intitama Perkebunan Prima, PT Karya Agung Megah Utama, PT Patiware, PT Perkebunan Anak Negeri Pasaman, PT Sawit Unggul Agro Niaga, PT Swadaya Indopalma, PT TH Indo Plantations (Nyato, Pulai), PT Tritunggal Sentra Buana (Salo Bandang) and PT Wawasan Kebun Nusantara, as well as PT Gandaraeh Hedana (Ukui II) and PT Inecda, both part of the business's joint venture with Samsung C&T Corporation.
- 125 Email to Greenpeace from Wilmar International, 14 March 2018
- 126 The majority shareholder of PT Patiware changed from PT GSU to PT Prima Panca Lestari, a subsidiary of PT AMS, on 22 December 2016. Source: corporate registry profiles.
- 127 Wilmar International Ltd (2018a) p2
- 128 See LinkedIn profile of Ivan Chandra <https://www.linkedin.com/in/ivanchandra/> accessed 14 June 2018.
- 129 Bunge Lodders Croklaan (2018)
- 130 Wilmar International Ltd (2018g)
- 131 Bunge Lodders Croklaan (2018) and Olam (2018)
- 132 Wilmar International Ltd (2018e,f,g)
- 133 The analysis represents collectively January 2017 through March 2018, though some traders' reporting periods differed within that time period.
- 134 AAK (2018)
- 135 Apical website 'Supply chain map'
- 136 Bunge Lodders Croklaan website 'List of mills'. Note that the mill lists used in this trader dashboard analysis reflect material entering refineries in the year 2017, when the refineries were still operating as IOI Lodders Croklaan. When Bunge completed its acquisition in February 2018 (see Bunge (2018)) it retroactively rebranded the 2017 mill lists as Bunge Lodders Croklaan; however, the current mill lists that are available have been reformatted and no longer indicate direct suppliers or time period of receipt.
- 137 Cargill/FoodReg website 'Supply chain map and mill list'
- 138 GAR website 'Traceability & supplier support'
- 139 Musim Mas website 'Supply chain map' and 'List of suppliers'
- 140 Olam (2018)
- 141 Sime Darby website 'Open palm traceability dashboard'
- 142 Wilmar International website 'Supply chain map'
- 143 Colgate-Palmolive (2018a,b)
- 144 Ferrero (2018) and Ferrero (2017) p193
- 145 General Mills website 'Global direct palm oil suppliers', General Mills (nd) and General Mills (2018)
- 146 Hershey (nd) and Hershey website 'Palm oil facts'
- 147 Kellogg's (2018a) p5 and Kellogg's (2018b)
- 148 Mars (2018a) and Mars (2018b) p5
- 149 Mondelēz (2018a,b)
- 150 Nestlé (2018a,b)
- 151 PepsiCo (2018a) p2 and PepsiCo (2018b)
- 152 Procter & Gamble website 'P&G's direct palm suppliers – 2017' and Procter & Gamble (2018)
- 153 PZ Cussons website 'CSR policies'
- 154 Reckitt Benckiser (2018a); see also Reckitt Benckiser (2018b) p1 for a list of their 'direct suppliers of palm oil-derived soap noodles' for 2017.
- 155 Unilever (nd a,b)
- 156 Mill disclosure analysis was performed using the most recently available data. The time period disclosed for all brands was January to December 2017, with the following exceptions: Ferrero's and Hershey's current disclosures cover the first half of 2017, Mars's current disclosure represents 2016 and Nestlé's current disclosure states only 'Snapshot: November 2017' (likely referring to all of 2017, as of November). In addition, these brands also publicly report the traders who supply their palm oil, palm kernel oil, and derivatives.
- 157 L'Oréal has disclosed some suppliers but no mills. Source: L'Oréal (2016)
- 158 ADM had a 24.9% stake in Wilmar as of August 2017. Source: Reidy S (2017).
- 159 Correspondence with Greenpeace, 8 June 2018
- 160 Trader dashboard analysis was based on the most recently available data, which for this group of traders extends from January 2017 through the end of the first quarter of 2018.
- 161 Unofficial translation. The original reads 'Kelompok (group) Perusahaan Perkebunan adalah kumpulan orang atau badan usaha perkebunan yang satu sama lain mempunyai kaitan dalam hal kepemilikan, pengurusan, dan/atau hubungan keuangan'. Source: Minister of Agriculture (2013) p4.
- 162 RSP0 (2017)
- 163 Under the International Accounting Standards (IAS), 'a related party is a person or entity that is related to the entity that is preparing its financial statements (referred to as the 'reporting entity') [IAS 24.9]. (a) A person or a close member of that person's family is related to a reporting entity if that person: (i) has control or joint control over the reporting entity; (ii) has significant influence over the reporting entity; or (iii) is a member of the key management personnel of the reporting entity or of a parent of the reporting entity. (b) An entity is related to a reporting entity if any of the following conditions applies: ... (vi) The entity is controlled or jointly controlled by a person identified in (a).'
- Source: Deloitte/IAS Plus website 'IAS 24 – Related party disclosures'.
- 164 Minister of Agriculture (2013) p4
- 165 RSP0 (2017)
- 166 Greenpeace International (2018)

# BIBLIOGRAPHY

AAK (2018) 'AAK public mill list' <https://aak.com/siteassets/sustainable-growth/aak-public-mill-list-may-2018.pdf>

Amnesty International (2016) 'The great palm oil scandal: Labour abuses behind big brand names' <https://www.amnesty.org/download/Documents/ASA2151842016ENGLISH.PDF>

Apical website 'Supply chain map' <http://www.sustainability.apicalgroup.com> <https://www.sustainability.apicalgroup.com/supply-chain-map/> accessed 16 June 2018

Arlinus Z (2015) 'Sad, scared, and alone: The baby orangutan orphaned by palm oil' 18 November 2015 Greenpeace <http://www.greenpeace.org/usa/sad-scared-and-alone-the-baby-orangutan-orphaned-by-palm-oil/>

Asrida E (2018) 'Catatan dari Papua: Konflik agraria belum usai, bagi-bagi hutan kepada pemodal jalan terus' 1 January 2018 <http://www.mongabay.co.id/2018/01/01/catatan-dari-papua-konflik-agraria-belum-usai-bagi-bagi-hutan-kepada-pemodal-jalan-terus/>

awasmiffee (2017) 'Gama Plantation: Building on deforestation and conflict' 13 September 2017 <https://awasmiffee.potager.org/?p=1538>

awasmiffee (2018) 'September 29th 2014, a terrible day for Papua's forests' 7 January 2018 <https://>

[awasmiffee.potager.org/?p=1600](https://awasmiffee.potager.org/?p=1600)

Barrock J (2017) 'Two-part plan to split up FELDA and FGV mooted' 8 May 2017 The Edge Markets <http://www.theedgemarkets.com/article/twopart-plan-split-felda-and-fgv-mooted>

Basik-Basik M (2016) 'Muting dulu dan kini, sebuah profil kampung' in ELSAM (2016) 'Pembela HAM menulis bunga rampai pendokumentasian situasi HAM di tanah Papua seri 1' <http://elsam.or.id/2016/11/pembela-ham-menulis-bunga-rampai-pendokumentasian-situasi-ham-di-tanah-papua-seri-1/>

Batam News (2018) 'Deal, PT Energi Unggul Persada investasi pabrik sawit Rp 1triliun di Batam' 25 January 2018 <http://batamnews.co.id/berita-29072-deal-pt-energi-unggul-persada-investasi-pabrik-sawit-rp-1-triliun-di-batam.html>

Bloomberg website 'Company overview of Bonoto Investments Limited' <https://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=528887865> accessed 14 June 2018

Bloomberg website 'Company overview of HPR Investments Limited' <https://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=529594304> accessed 14 June 2018

Bunge (2018) 'Bunge completes

acquisition of IOI Lodders Croklaan' 1 March 2018 <https://www.bunge.com/news/bunge-completes-acquisition-ioi-lodders-croklaan>

Bunge Lodders Croklaan (2018) 'Global full mill list' [http://europe.bungeloders.com/images/applications/Bunge\\_Total\\_Mill\\_List\\_2017Q2\\_-\\_2018Q1.pdf](http://europe.bungeloders.com/images/applications/Bunge_Total_Mill_List_2017Q2_-_2018Q1.pdf)

Bunge Lodders Croklaan website 'List of mills' <http://europe.bungeloders.com/taking-responsibility/list-of-mills/> accessed 16 June 2018

Cargill/FoodReg website 'Supply chain map and mill list' <https://secure1.foodreg.net/ksportal/web/cargill/supply-chain-map> accessed 16 June 2018

Colgate-Palmolive (2018a) 'Colgate Palmolive list of mills as of 2017' [https://www.colgatepalmolive.com/content/dam/cp-sites/corporate/corporate/en\\_us/corp/locale-assets/pdf/Colgate%20Palmolive%20List%20of%20Mills\\_2.pdf](https://www.colgatepalmolive.com/content/dam/cp-sites/corporate/corporate/en_us/corp/locale-assets/pdf/Colgate%20Palmolive%20List%20of%20Mills_2.pdf)

Colgate-Palmolive (2018b) 'Statement: Palm oil mills disclosure' [https://www.colgatepalmolive.com/content/dam/cp-sites/corporate/corporate/en\\_us/corp/locale-assets/pdf/Statement\\_Palm\\_Oil\\_Mills\\_Disclosure\\_Feb\\_12\\_2018.pdf](https://www.colgatepalmolive.com/content/dam/cp-sites/corporate/corporate/en_us/corp/locale-assets/pdf/Statement_Palm_Oil_Mills_Disclosure_Feb_12_2018.pdf)

Compliance Advisor/Ombudsman (2009) 'Audit report: CAO audit of

IFC CAO compliance' 19 June 2009

[http://www.cao-ombudsman.org/uploads/case\\_documents/Combined%20Document%201\\_2\\_3\\_4\\_5\\_6\\_7.pdf](http://www.cao-ombudsman.org/uploads/case_documents/Combined%20Document%201_2_3_4_5_6_7.pdf)

Conde J (2012) 'Letter from the Chairman [Whitehaven Coal Ltd]' 14 March 2012 [http://member.afraccess.com/media?id=CMN://2A671271&filename=20120314/WHC\\_01278642.pdf](http://member.afraccess.com/media?id=CMN://2A671271&filename=20120314/WHC_01278642.pdf)

Deloitte/IAS Plus website 'IAS 24 – Related party disclosures' <https://www.iasplus.com/en/standards/ias/ias24>

The Edge Malaysia (2018) 'FGV denies restructuring or takeover' 4 May 2018 <http://www.theedgemarkets.com/article/fgv-denies-restructuring-or-takeover>

Ferrero (2017) 'Corporate social responsibility report 2016' <https://s3-eu-west-1.amazonaws.com/ferrero-static/globalcms/documenti/2807.pdf>

Ferrero (2018) '2017 January-June palm oil supplier mill list' <https://s3-eu-west-1.amazonaws.com/ferrero-static/globalcms/documenti/2904.pdf>

Forbes website 'Profile: Kuok Khoon Hong' <https://www.forbes.com/profile/kuok-khoon-hong/>

Forest Peoples Programme (2011) 'Press release: New report exposes human rights abuses in Wilmar Group plantation in Jambi, Indonesia' 21 November 2011 <https://www.forestpeoples.org/topics/palm-oil-rspo/news/2011/11/press-release-new-report-exposes-human-rights-abuses-wilmar-group->

Forest Peoples Programme (2018) 'Wilmar International implicated in police shooting of two farmers on oil palm estate' 9 January 2018 <https://www.forestpeoples.org/en/responsible-finance-private-sector-palm-oil-rspo/news-article/2018/wilmar-international-implicated>

foresthints.news (2018) 'GAMA operations exemplify irresponsible company' 12 April 2018 <http://foresthints.news/gama-operations-exemplify-irresponsible-company-says-rfn>

GAR website 'Traceability & supplier support' <https://goldenagri.com.sg/sustainability-dashboard/traceability> accessed 16 June 2018

General Mills website 'Global direct palm oil suppliers' <http://www.generalmills.com/en/news/>

<http://www.generalmills.com/en/news/issues/palm-oil-statement/current-direct-suppliers>

General Mills (nd) 'AAK public mill list' <http://www.generalmills.com/~media/Files/Issues/aak-public-mill-list.pdf?la=en>

General Mills (2018) 'Palm oil master list' <http://www.generalmills.com/~media/Files/Issues/PalmOil%20MasterList%20318.pdf?la=en>

Government of Indonesia (2001) 'Law no. 21 of 2001, on special autonomy for the Papua Province' 22 October 2001 <http://www.refworld.org/docid/46af542e2.html>

Greenpeace International (2013) 'Licence to kill' October 2013 [http://www.greenpeace.org/finland/Global/international/publications/forests/2013/LicenceToKill\\_ENG\\_LOWRES.pdf](http://www.greenpeace.org/finland/Global/international/publications/forests/2013/LicenceToKill_ENG_LOWRES.pdf)

Greenpeace International (2018) 'Moment of truth' March 2018 <https://www.greenpeace.org/international/publication/15395/moment-of-truth/>

Hadi S (2018) Letter from Sutarto Hadi, HR POD Division Head, Gama Plantation, 12 February 2018 <https://www.unsika.ac.id/sites/default/files/GAMA%20PLANTATION.pdf>

Hershey (nd) 'January through June 2017 palm oil traceability – Mill listing' <https://www.thehersheycompany.com/content/dam/corporate-us/documents/information/hershey-h1-2017-traceability-data.pdf>

Hershey website 'Palm oil facts' [https://www.thehersheycompany.com/en\\_us/shared-goodness/shared-business/palm-oil-facts.html](https://www.thehersheycompany.com/en_us/shared-goodness/shared-business/palm-oil-facts.html)

Indigo A (2018) Fax from Andy Indigo to Greenpeace, 20 June 2018

Infosawit (2017) 'Darwin Indigo – Generasi kedua penerus dampin Sawit Wilmar' 28 December 2015 <https://www.infosawit.com/news/7444/darwin-indigo--generasi-kedua-penerus-kampin-sawit-wilmar>

International Palm Oil Monitor (2018) 'Will FGV announce a takeover before the Malaysian general elections on 9 May?' 30 April 2014 <http://ipom.global/2018/04/30/will-fgv-announce-a-takeover-before-the-malaysian-general-elections-on-9-may/>

Irawan Y (2015) 'Terpisah dari induknya, bayi orangutan diselamatkan pekerja perkebunan sawit' 18 September

2015 Kompas.com <http://regional.kompas.com/read/2015/09/18/20381181/Terpisah.dari.Induknya.Bayi.Orangutan.Diselamatkan.Pekerja.Perkebunan.Sawit>

Joshi S (2017) Letter from Seema Joshi, Head of Business and Human Rights, Amnesty International, to Jeremy Goon, Chief Sustainability Officer, Wilmar International, 21 July 2017 <https://www.amnesty.org/download/Documents/ASA2171912017ENGLISH.PDF>

Kellogg's (2018a) '2017 H1 global sustainable palm oil milestones January 2017 – June 2017, addendum added April 2018' <https://www.kelloggcompany.com/content/dam/kelloggcompanyus/corporate-responsibility/pdf/2017/2017MidYear-PalmMilestones.pdf>

Kellogg's (2018b) 'Extended supply chain mill list' <http://www.kelloggcompany.com/content/dam/kelloggcompanyus/corporate-responsibility/pdf/2018/KelloggExtendedSupplyChainMill-List.pdf>

Kiezebrink V (2017) 'Palming off responsibility: Labour rights violations in the Indonesian palm oil sector' Stichting Onderzoek Multinationale Ondernemingen and CNV International <https://www.cnvinternationaal.nl/Resources/Persistent/494a6d41ea4525468b46072a02e31f21e85a59c6/CNV-0118%20Palmolie%20Indonesie-rapport-Low%20Res.pdf>

Klawitter N (2014) 'The dirty business of palm oil' 2 May 2014 Spiegel Online <http://www.spiegel.de/international/world/indonesian-villagers-driven-from-villages-in-palm-oil-land-theft-a-967198.html>

Koalisi Organisasi Masyarakat Sipil (2016) 'Hentikan bisnis militer dan hormati hak masyarakat adat Papua' 22 July 2016 <https://awasmifee.potager.org/?p=1440&lang=id>

Krishnan R (2013) Letter from Ravin Krishnan, RSPo Complaints Coordinator, to PT Agro Mandiri Semesta Plantation – Ganda Group, 22 July 2013 [https://www.rspo.org/file/letter-to-Ganda-group-22July2013\(1\).pdf](https://www.rspo.org/file/letter-to-Ganda-group-22July2013(1).pdf)

Krisno O (2017) 'Warga Ambawang protes perusahaan sawit' 25 August 2017 <https://daerah.sindonews.com/read/1233847/174/warga-ambawang->

[protes-perusahaan-sawit-1503658356](#)

Kuok KH (2016) 'Speech by Mr Kuok Khoo Hong, Wilmar's Chairman & CEO, at Wilmar's 25th anniversary gala dinner on 15 April 2016' <http://www.wilmar-international.com/wp-content/uploads/2016/04/Speech-by-Mr-KKH-at-Wilmars-25th-Anniversary-Dinner.pdf>

Kuok KH (2018) Fax from Kuok Khoo Hong to Greenpeace, 20 June 2018

Kurniati D (2017) '10 tahun konflik anak usaha Wilmar Group vs warga Kalteng, aktornya polisi hingga tokoh' 21 December 2017 KBR.id <http://kbr.id/nusantara/12-2017/10-tahun-konflik-anak-usaha-wilmar-group-vs-warga-kalteng-aktornya-polisi-hingga-tokoh/94091.html>

L'Oréal website 'L'Oréal supports smallscale palm oil farmers' April 2016 <https://sharingbeautywithall.loreal.com/innovating/achieving-zero-deforestation/loreal-supports-smallscale-palm-oil-farmers>

Mars (2018a) 'Mars Incorporated mill list full year 2016' <https://www.mars.com/docs/default-source/default-document-library/mars-suppliers--2016-full-mill-list.pdf?sfvrsn=2>

Mars (2018b) 'Update on sustainable palm oil sourcing' [https://www.mars.com/docs/default-source/Policies-and-Practices/marspalmupdate\\_march\\_2018.pdf?sfvrsn=4](https://www.mars.com/docs/default-source/Policies-and-Practices/marspalmupdate_march_2018.pdf?sfvrsn=4)

Minister of Agriculture (2013) 'Ministerial regulation on plantation business permitting procedures / Peraturan Menteri Pertanian Republik Indonesia no. 98/Permentan/OT.140/9/2013 tentang pedoman perizinan usaha perkebunan' 30 September 2013 <http://ditjenbun.pertanian.go.id/tinympuk/gambar/file/Permentan%2098-2013.pdf>

Mondelēz (2018a) 'Mondelēz International mill list, March 2018' [https://www.mondelezinternational.com/impact/sustainable-resources-and-agriculture/~media/mondelezcorporate/uploads/downloads/Mills\\_Data.pdf](https://www.mondelezinternational.com/impact/sustainable-resources-and-agriculture/~media/mondelezcorporate/uploads/downloads/Mills_Data.pdf)

Mondelēz (2018b) 'Mondelēz International palm oil supplier list, February, 2018' [https://www.mondelezinternational.com/~media/mondelezcorporate/uploads/downloads/supplier\\_list.pdf](https://www.mondelezinternational.com/~media/mondelezcorporate/uploads/downloads/supplier_list.pdf)

Musim Mas website 'List of

suppliers' <http://www.musimmas.com/sustainability/traceable-supply-chain/list-of-suppliers> accessed 16 June 2018

Musim Mas website 'Supply chain map' <http://www.musimmas.com/sustainability/traceable-supply-chain/supply-chain-map> accessed 16 June 2018

Nestlé (2018a) 'Nestlé list of supplying mills – Snapshot: November 2017' <https://www.nestle.com/asset-library/documents/creating-shared-value/responsible-sourcing/list-mills-february-2018.pdf>

Nestlé (2018b) 'Tier 1 supplier's names' <https://www.nestle.com/asset-library/documents/creating-shared-value/responsible-sourcing/tier1-po-suppliers-feb-2018.pdf>

Ngelia Y (2016) 'Campur tangan militer dan polisi dalam kasus sengketa tanah pada mega industri pertanian di Muting Merauke' in ELSAM (2016) 'Pembela HAM menulis bunga rampai pendokumentasian situasi HAM di tanah Papua seri 1' <http://elsam.or.id/2016/11/pembela-ham-menulis-bunga-rampai-pendokumentasian-situasi-ham-di-tanah-papua-seri-1/>

Olam (2018) 'Olam mill list (2017)' <http://49tmko49h46b4e0czy3rlqaye1b.wpengine.netdna-cdn.com/wp-content/uploads/2018/05/2017-Mill-List-April-2018.pdf>

Paino C (2017) 'Polemik tanah marga di Kampung Bupul, saat hutan berubah jadi kebun sawit' 30 November 2017 <http://www.mongabay.co.id/2017/11/30/polemik-tanah-marga-di-kampung-bupul-saat-hutan-berubah-jadi-kebun-sawit/> (English translation available at <https://awasmiffee.potager.org/?p=1585>)

PepsiCo (2018a) 'Palm oil supply and traceability' [http://www.pepsico.com/docs/album/policies-doc/pepsico-2018-direct-palm-oil-supplier-list\\_vf.pdf](http://www.pepsico.com/docs/album/policies-doc/pepsico-2018-direct-palm-oil-supplier-list_vf.pdf)

PepsiCo (2018b) 'PepsiCo palm oil mill list 2017' <https://www.pepsico.com/docs/album/policies-doc/pepsico-2017-palm-oil-mill-list.pdf>

Pontianak Post (2016) 'PT AAN bagikan SHU untuk dua koperasi' 4 July 2016 <https://www.pontianakpost.co.id/pt-aan-bagikan-shu-untuk-dua-koperasi>

Procter & Gamble website 'P&G's direct palm suppliers – 2017' <https://us.pg.com/sustainability/>

[environmental-sustainability/policies-practices/palm-oil/pandg-direct-palm-suppliers-2017](#)

Procter & Gamble (2018) 'P&G 2017 palm oil mills' <https://us.pg.com/-/media/PGCOMUS/Documents/PDF/PG%202017%20Palm%20oil%20Mills.pdf?la=en-US&v=1-201802280708&hash=A585AD28988F160AB4AE854EFA7F75195F73C3F>

PZ Cussons website 'CSR policies' [https://www.pzcussons.com/en\\_int/downloads/CSR%20policies/](https://www.pzcussons.com/en_int/downloads/CSR%20policies/)

Reckitt Benckiser (2018a) 'RB 2017 palm oil mills' [http://www.rb.com/media/3314/rb-palm-oil-mill-list\\_2017.pdf](http://www.rb.com/media/3314/rb-palm-oil-mill-list_2017.pdf)

Reckitt Benckiser (2018b) 'RB's next steps on responsible palm oil – 2018 and beyond' [https://www.rb.com/media/3322/rb-s-plans-for-responsible-palm-oil-sourcing-2018\\_final\\_all-suppliers.pdf](https://www.rb.com/media/3322/rb-s-plans-for-responsible-palm-oil-sourcing-2018_final_all-suppliers.pdf)

Redaksi (2009) 'Tanjabtim akan membangun pelabuhan internasional' 11 April 2009 Berita Sore Online <http://beritasore.com/2009/04/11/tanjabtim-akan-membangun-pelabuhan-internasional/>

Reidy S (2017) 'ADM again increases stake in Wilmar' 23 August 2017 [http://www.world-grain.com/articles/news\\_home/World\\_Grain\\_News/2017/08/ADM\\_again\\_increases\\_stake\\_in\\_W.aspx?ID=%7B2A54CD13-D53C-4509-8E31-7957F10717E5%7D&cck=1](http://www.world-grain.com/articles/news_home/World_Grain_News/2017/08/ADM_again_increases_stake_in_W.aspx?ID=%7B2A54CD13-D53C-4509-8E31-7957F10717E5%7D&cck=1)

RSPO (2017) 'RSPO membership rules 2016' <https://www.rspo.org/publications/download/638ae27c7f6b004>

RSPO website 'Case tracker: PT Asiatic Persada' <https://rspo.org/members/complaints/status-of-complaints/view/1>

RSPO website 'Case tracker: PT Bumi Sawit Kencana II' <https://www.rspo.org/members/complaints/status-of-complaints/view/99>

Samsung C&T Corporation and Subsidiaries (2017) 'Consolidated interim financial statements June 30, 2017 and 2016' <http://www.samsungcnt.com/downloadFile.do?fileSeqNum=rkqaliicmbfy>

Saturi S (2013) 'Bentrok warga pantap vs satpam Wilmar buntut konflik lahan berlarut' 28 July 2013 Mongabay Indonesia <http://www.mongabay.co.id/2013/07/28/bentrok-warga-pantap-vs-satpam-wilmar-buntut-konflik-lahan-berlarut/>

Sime Darby website 'Open palm traceability dashboard' <http://www.simedarbyplantation.com/sustainability/open-palm-traceability-dashboard> accessed 16 June 2018

Singapore Exchange (2015a) 'Disclosure of interest/ Changes in interest of substantial shareholder(s)/unitholder(s): Notice of change in the percentage level of substantial shareholder's interest – Mr Martua Sitorus' 20 August 2015 [http://media.corporate-ir.net/media\\_files/IROL/16/164878/announcement/RNS/8.20.15/SGX%20Announcement\\_Notice%20of%20Change%20in%20the%20Percentage%20Level%20of%20Substantial%20Shareholder%20Interest%20-%20Mr%20Martua%20Sitorus.pdf](http://media.corporate-ir.net/media_files/IROL/16/164878/announcement/RNS/8.20.15/SGX%20Announcement_Notice%20of%20Change%20in%20the%20Percentage%20Level%20of%20Substantial%20Shareholder%20Interest%20-%20Mr%20Martua%20Sitorus.pdf)

Singapore Exchange (2015b) 'General announcement: Disclosure pursuant to rule 704(10) of the SGX-X listing manual' 28 December 2015 [http://infopub.sgx.com/Apps?A=COW\\_CorpAnnouncement\\_Content&B=AnnouncementToday&F=V84SG2YV040SME1&H=81316f49e6515b54f772ba5d3768f830fbfccca2c134a69d4f5e06ccda84df8d6](http://infopub.sgx.com/Apps?A=COW_CorpAnnouncement_Content&B=AnnouncementToday&F=V84SG2YV040SME1&H=81316f49e6515b54f772ba5d3768f830fbfccca2c134a69d4f5e06ccda84df8d6)

Singapore Exchange (2018) 'Disclosure of interest/ Changes in interest of Director/Chief Executive Officer: Disclosure of change in interest by director – Mr Kuok Khoon Hong' 14 May 2018, [http://media.corporate-ir.net/media\\_files/IROL/16/164878/WIL-Announcement-Disclosure-of-change-in-interest-by-Director-Kuok-Khoon-Hong-14-05-18.pdf](http://media.corporate-ir.net/media_files/IROL/16/164878/WIL-Announcement-Disclosure-of-change-in-interest-by-Director-Kuok-Khoon-Hong-14-05-18.pdf)

SOMO (2017) 'The two hats of public security actors in Indonesia' June 2017 <https://www.somo.nl/wp-content/uploads/2017/06/SOMO-report-The-two-hats-of-public-security-actors-Indonesia.pdf>

Straits Times (2018) 'OCBC, Wilmar deal pegs loan to green goals' 9 June 2018 <https://www.straitstimes.com/business/companies-markets/ocbc-wilmar-deal-pegs-loan-to-green-goals>

Suara Pusaka (2018) 'Deforestasi di Papua, APM diduga merambah hutan cagar alam' 18 March 2018 <http://pusaka.or.id/2018/03/deforestasi-di-papua-apm-diduga-merambah-hutan-cagar-alam/>

Suhendra (2016) 'Mengeruk kapur membangun pencakar langit' 11 August 2016 Tirto.id <https://tirto.id/mengeruk-kapur-membangun-pencakar-langit-bzKy>

TFT Transparency Hub website 'Wilmar' <http://www.tft-transparency.org/member/wilmar/what-we-do/>

Times Indonesia (2017) 'GAMA Corp siap investasi Rp 1 trilliun di Bontang' 26 January 2017 <https://www.timesindonesia.co.id/read/141285/1/20170126/162444/gama-corp-siap-investasi-rp-1-triliun-di-bontang/>

Trianita L (2018) 'Acrobat lahan Raja Sawit' 19 March 2018 Tempo Magazine <https://investigasi.tempo.co/241/akrobat-lahan-raja-sawit>

Tribun Pontianak (2017) 'Puluhan warga sungai Limau datangi kantor DPRD, ini tuntutan' 12 July 2017 <http://pontianak.tribunnews.com/2017/05/12/breaking-news-puluhan-warga-sungai-limau-datangi-kantor-dprd-ini-tuntutannya>

Tribun Pontianak (2018) 'Peresmian pabrik minyak kelapa sawit PT GAN di Kubu Raya' 20 March 2018 <http://pontianak.tribunnews.com/2018/03/20/peresmian-pabrik-minyak-kelapa-sawit-pt-gan-di-kuburaya>

Unilever (nd a) 'Unilever 2017 palm oil mills' [https://www.unilever.com/Images/unilever-palm-oil-mill-list\\_tcm244-515895\\_en.pdf](https://www.unilever.com/Images/unilever-palm-oil-mill-list_tcm244-515895_en.pdf)

Unilever (nd b) 'Unilever 2017 palm oil suppliers' [https://www.unilever.com/Images/unilever-palm-oil-supplier-list\\_tcm244-515896\\_en.pdf](https://www.unilever.com/Images/unilever-palm-oil-supplier-list_tcm244-515896_en.pdf)

Wakker E, Miettinen O & Zul Fahmi (2004) 'PT Jatim Jaya Perkasa (Wilmar Group) in Riau, Indonesia: Field assessment of environmental and social impacts of oil palm plantations', Aidenvironment

Wealth-X website 'Khoon Hong Kuok' <https://www.wealthx.com/dossier/khoon-hong-kuok/>

White A (2015) 'Revealed: Secret plans to build London's next mega tower' 5 July 2105 The Telegraph <https://www.telegraph.co.uk/finance/property/11719195/Revealed-Secret-plans-to-build-Londons-next-mega-tower.html>

Wilmar International Ltd (2011) 'Notification pursuant to Rule704(11)

of SGX-ST Listing Manual' 23 February 2011 [http://media.corporate-ir.net/media\\_files/IROL/16/164878/SGX/2011/NotificationSGX70411\\_23Feb2011.pdf](http://media.corporate-ir.net/media_files/IROL/16/164878/SGX/2011/NotificationSGX70411_23Feb2011.pdf)

Wilmar International Ltd (2013a) 'Change of Chief Operating Officer ("COO")' 10 May 2013 <http://ir-media.wilmar-international.com/phoenix.zhtml?c=164878&p=irol-news&nyo=5>

Wilmar International Ltd (2013b) 'No deforestation, no peat, no exploitation policy' 5 December 2013 <http://www.wilmar-international.com/wp-content/uploads/2012/11/No-Deforestation-No-Peat-No-Exploitation-Policy.pdf>

Wilmar International Ltd (2013c) 'Response to Greenpeace report' 21 October 2013 [http://media.corporate-ir.net/media\\_files/IROL/16/164878/CSR-statements/Response-to-Greenpeace-Report.pdf](http://media.corporate-ir.net/media_files/IROL/16/164878/CSR-statements/Response-to-Greenpeace-Report.pdf)

Wilmar International Ltd (2013d) 'Wilmar International announces policy to protect forests and communities' 5 December 2013 <http://www.tft-earth.org/wp-content/uploads/2015/01/WIL-Announces-No-Deforestation-No-Peat-No-Exploitation-Policy-5-Dec-2013.pdf>

Wilmar International Ltd (2014a) 'Asset acquisitions and disposals: Notification on Wilmar subsidiaries and associated companies' 29 December 2014 [http://media.corporate-ir.net/media\\_files/IROL/16/164878/SGX/2014/SGX\\_Announcement\\_Notification\\_on\\_WIL\\_subs\\_and\\_asso\\_cos\\_dd\\_29Dec2014.pdf](http://media.corporate-ir.net/media_files/IROL/16/164878/SGX/2014/SGX_Announcement_Notification_on_WIL_subs_and_asso_cos_dd_29Dec2014.pdf)

Wilmar International Ltd (2014b) 'Sustainability report 2013' <http://www.wilmar-international.com/wp-content/uploads/2013/01/Wilmar-Sustainability-Report-2013-FINAL.pdf>

Wilmar International Ltd (2017a) '25 years of growth: Annual report 2016' [http://media.corporate-ir.net/media\\_files/IROL/16/164878/Wilmar-International-Limited-AR-2016-Revised.pdf](http://media.corporate-ir.net/media_files/IROL/16/164878/Wilmar-International-Limited-AR-2016-Revised.pdf)

Wilmar International Ltd (2017b) 'Re-designation of Executive Deputy Chairman to Non-Independent Executive Director' 31 March 2017 <http://infopub.sgx.com/FileOpen/Re-designation%20of%20Mr%20Martua%20Sitorus%20from%20Executive%20Deputy%20Chairman%20to%20Non-Independent%20Non-Executive%20Director%20dd%20>

[31Mar17.ashx?App=Announcement&FileID=445601](http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426_WICA-PTK_L2.pdf)

Wilmar International Ltd (2018a)  
'Announcement – Notification of changes to subsidiaries, joint venture companies and associated companies'  
24 May 2018 [http://infopub.sgx.com/FileOpen/Notification%20of%20changes%20to%20WIL%20Subs\\_JV%20Cos\\_Aso%20Cos%20dd%2024%20May%202018.ashx?App=Announcement&FileID=507227](http://infopub.sgx.com/FileOpen/Notification%20of%20changes%20to%20WIL%20Subs_JV%20Cos_Aso%20Cos%20dd%2024%20May%202018.ashx?App=Announcement&FileID=507227)

Wilmar International Ltd (2018b) 'Annual report 2017'  
[http://media.corporate-ir.net/media\\_files/IROL/16/164878/Wilmar-Annual-Report-2017-final.pdf](http://media.corporate-ir.net/media_files/IROL/16/164878/Wilmar-Annual-Report-2017-final.pdf)

Wilmar International Ltd (2018c)  
'PT Multimas Nabati Asahan, Kuala Tanjung – Traceability summary – Supplies January 2017 – December 2017'  
[http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426\\_MNA-KTJ\\_L2.pdf](http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426_MNA-KTJ_L2.pdf)

Wilmar International Ltd (2018d)  
'PT Sinar Alam Permai, Palembang – Traceability summary – Supplies January 2017 – December 2017'  
[http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426\\_SAP-PLG\\_L2.pdf](http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426_SAP-PLG_L2.pdf)

Wilmar International Ltd (2018e)  
'PT Wilmar Cahaya Indonesia, Pontianak – Traceability summary – Supplies January 2017 – December 2017'

[http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426\\_WICA-PTK\\_L2.pdf](http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426_WICA-PTK_L2.pdf)

Wilmar International Ltd (2018f)  
'PT Wilmar Nabati Indonesia, Balikpapan – Traceability summary – Supplies January 2017 – December 2017'  
[http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426\\_WINA-BLK\\_L2.pdf](http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/04/180426_WINA-BLK_L2.pdf)

Wilmar International Ltd (2018g)  
'PT Wilmar Nabati Indonesia, Dumai – Traceability summary – Supplies January 2017 – December 2017'  
[http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/05/180503\\_WINA-DMI\\_L2.pdf](http://www.wilmar-international.com/sustainability/wp-content/uploads/2018/05/180503_WINA-DMI_L2.pdf)

Wilmar International Ltd & ING Bank (2017) 'Wilmar and ING collaborate on sustainable loan in Asia' 27 November 2017 press release  
<http://www.wilmar-international.com/sustainability/wp-content/uploads/2017/11/Joint-Press-Release-Wilmar-and-ING-collaborate-on-sustainable-loan-in-Asia.pdf>

Wilmar International website  
'Supply chain map' <http://www.wilmar-international.com/sustainability/supply-chain-map/> accessed 16 June 2018

Wilmar International website  
'Who we are: Kuok Khoon Hong' <http://www.wilmar-international.com/who-we-are/board-of-directors/kuok->

[khoon-hong/](http://www.wilmar-international.com/who-we-are/board-of-directors/martua-sitorus/) accessed 14 June 2018

Wilmar International website  
'Who we are: Martua Sitorus' <http://www.wilmar-international.com/who-we-are/board-of-directors/martua-sitorus/> accessed 14 June 2018

Wright S & Karmini N (2017)  
'Indonesia forest threatened by development despite new rules' 23 August 2017 <https://www.apnews.com/Oa54eebd250146baa82a8e4565a7499f>

WWF Indonesia (2013) 'Palming off a national park: Tracking illegal oil palm fruit in Riau, Sumatra' <http://wwf.panda.org/?209261/REPORT-Palming-off-a-National-Park-Tracking-Illegal-Palm-Oil-Fruit-in-Riau-Sumatra>

Yanlord Land Group Ltd (2013)  
'Growing our strengths: Annual report 2012' <http://img2.soufunimg.com/qyb/EnterpriseReport/614c0946-1baa-4548-b227-84bc86406a3f.pdf>

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