

GREENPEACE

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:

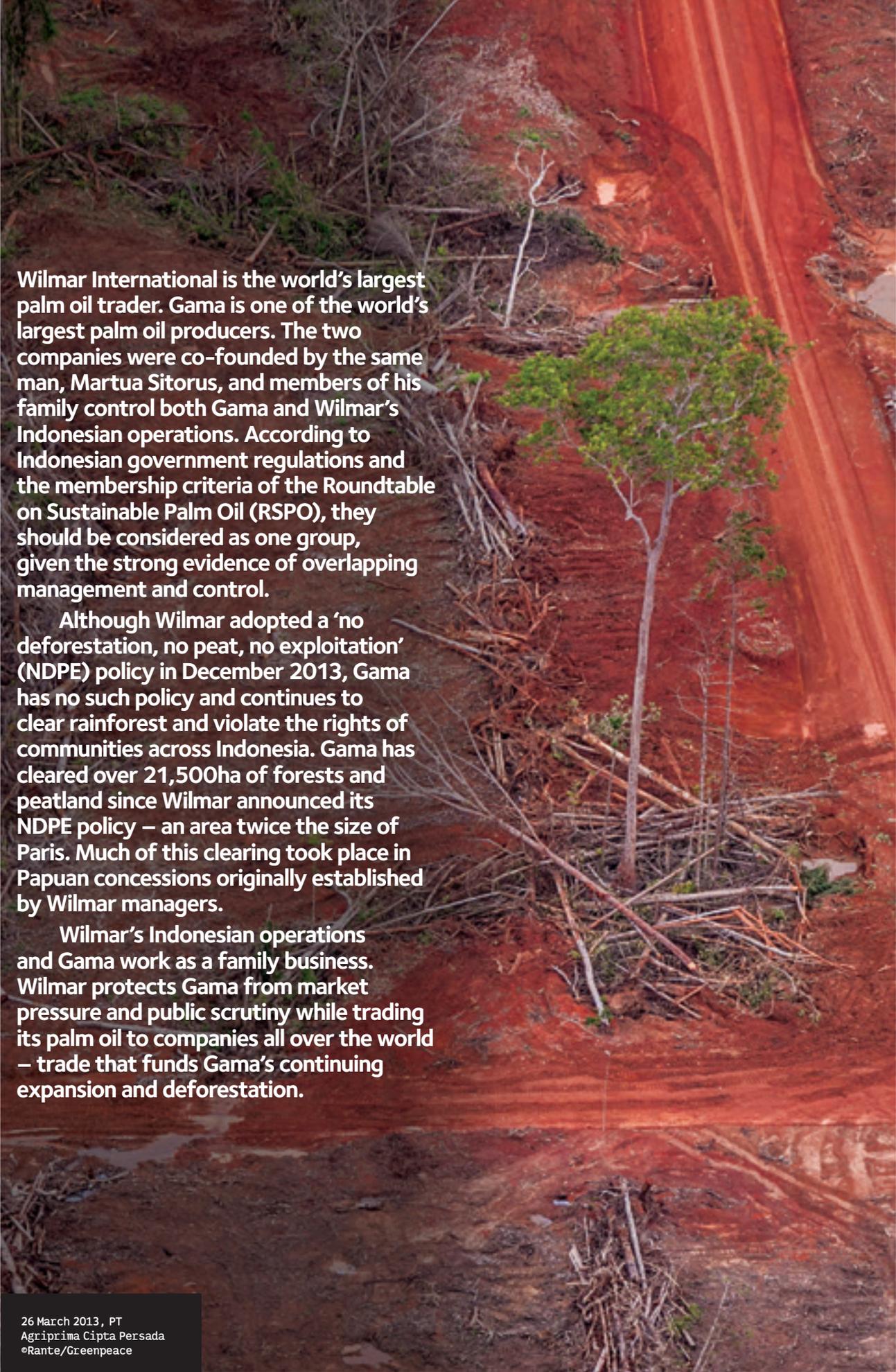
- | | |
|--|--|
| 1. Weijian Shan, Independent Director | 8. Yeo Tong Yang, Lead Independent Director |
| 2. Lim Siong Guan, Independent Director | 9. Kuok Khoon Ean, Non-Executive Director |
| 3. Kuok Khoon Hua, Non-Executive Director | 10. Tay Kah Chye, Independent Director |
| 4. Juan Ricardo Luciano, 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 | |

‘NEVER IN MARTUA’S AND MY WILDEST DREAMS DID WE EXPECT WILMAR TO BECOME WHAT IT IS TODAY.’¹

KUOK KHOON HONG, CEO, WILMAR INTERNATIONAL

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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.³ In December 2013, it adopted an NDPE policy that applied both to its own operations as a producer and to those of its suppliers.⁴ The policy's comprehensiveness and 'credible plan for implementation' were hailed by its implementation partner, The Forest Trust.⁵

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

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.⁸

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.⁹

MARTUA SITORUS: THE MAN BEHIND WILMAR AND GAMA

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

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.¹²

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',¹³ while Sitorus was 'instrumental in the development of the Group's business operations in Indonesia'.¹⁴

Martua Sitorus has been on Wilmar's board since the company went public in 2006.¹⁵ He was Executive Director/Chief Operating Officer until June 2013, when he stepped down to 'focus more time on his family business'.¹⁶ He then served as Executive Deputy Chairman in charge of Wilmar's operations in Indonesia and its plantation operations¹⁷ until he stepped down in March 2017, again to 'focus his attention on his family business'.¹⁸ 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 MArdua – in 2011. Sitorus's profile on Wilmar's website describes him as 'the CEO of Gama Corp group of companies',¹⁹ 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 family²⁰ 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.²¹

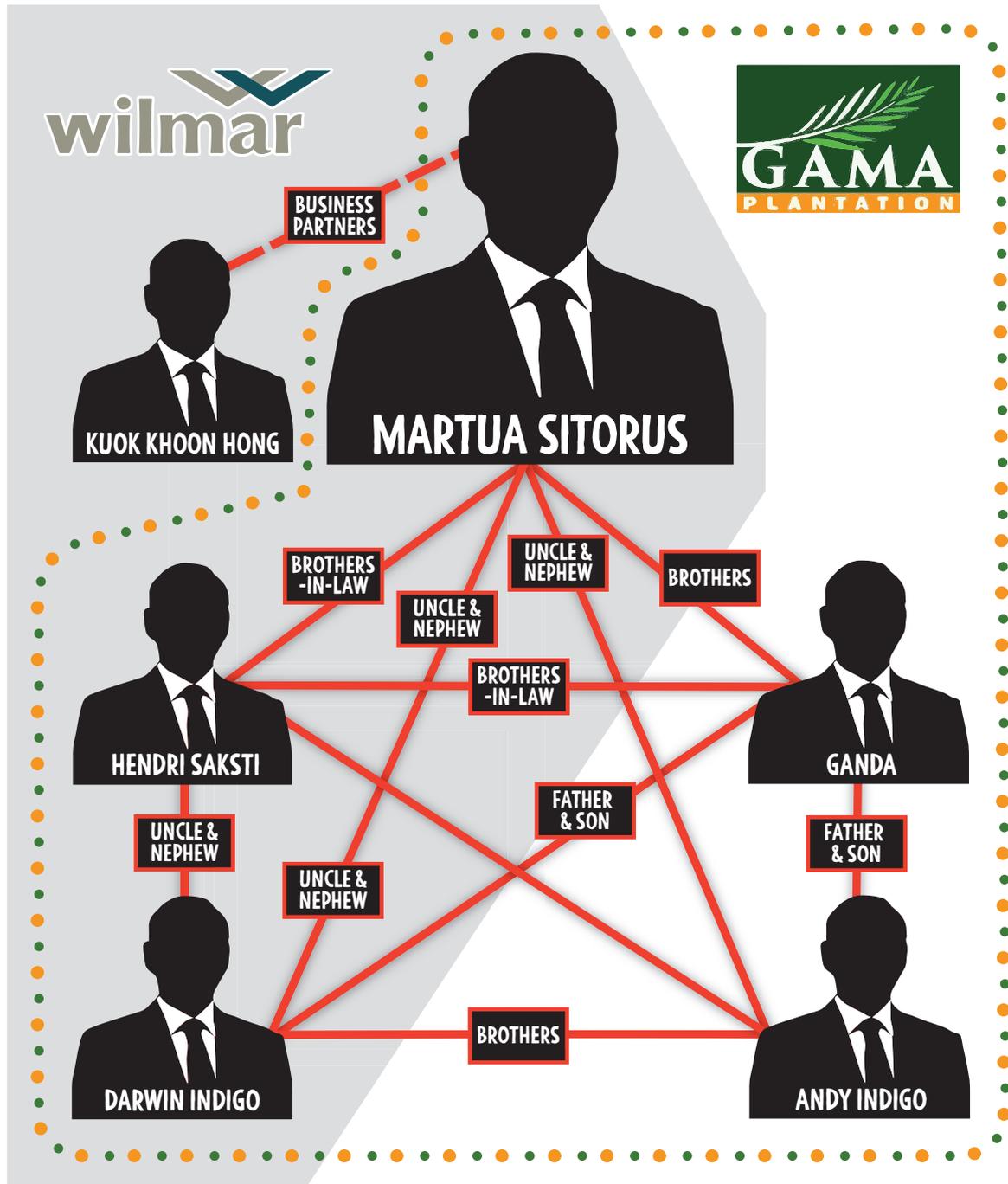
Gama appears to be pursuing a deliberate strategy of using Wilmar to advance the family's business interests.

Hendri Saksti, brother-in-law of Ganda and Martua Sitorus,²² is Wilmar International's Country Head for Indonesia.²³ Saksti is also the majority shareholder of oil palm plantation company PT Agro Alam Nusantara,²⁴ reportedly managed by Gama,²⁵ and is Commissioner of PT Tritunggal Sentra Buana,²⁶ 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,²⁷ part of Katingan Timber Group, another Gama company.

Darwin Indigo, Ganda's son and Sitorus's nephew,²⁸ 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.²⁹ Within Gama, he is a director of the group's joint venture with Samsung C&T Corporation.³⁰ Darwin's brother, Andy Indigo,³¹ controls Gama's Indonesian plantations.³²

'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.⁴⁸

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).⁴⁹ 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;⁵⁰ it was sold to Gama in 2005⁵¹ following NGO reports of deforestation.⁵²

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'.⁵³

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

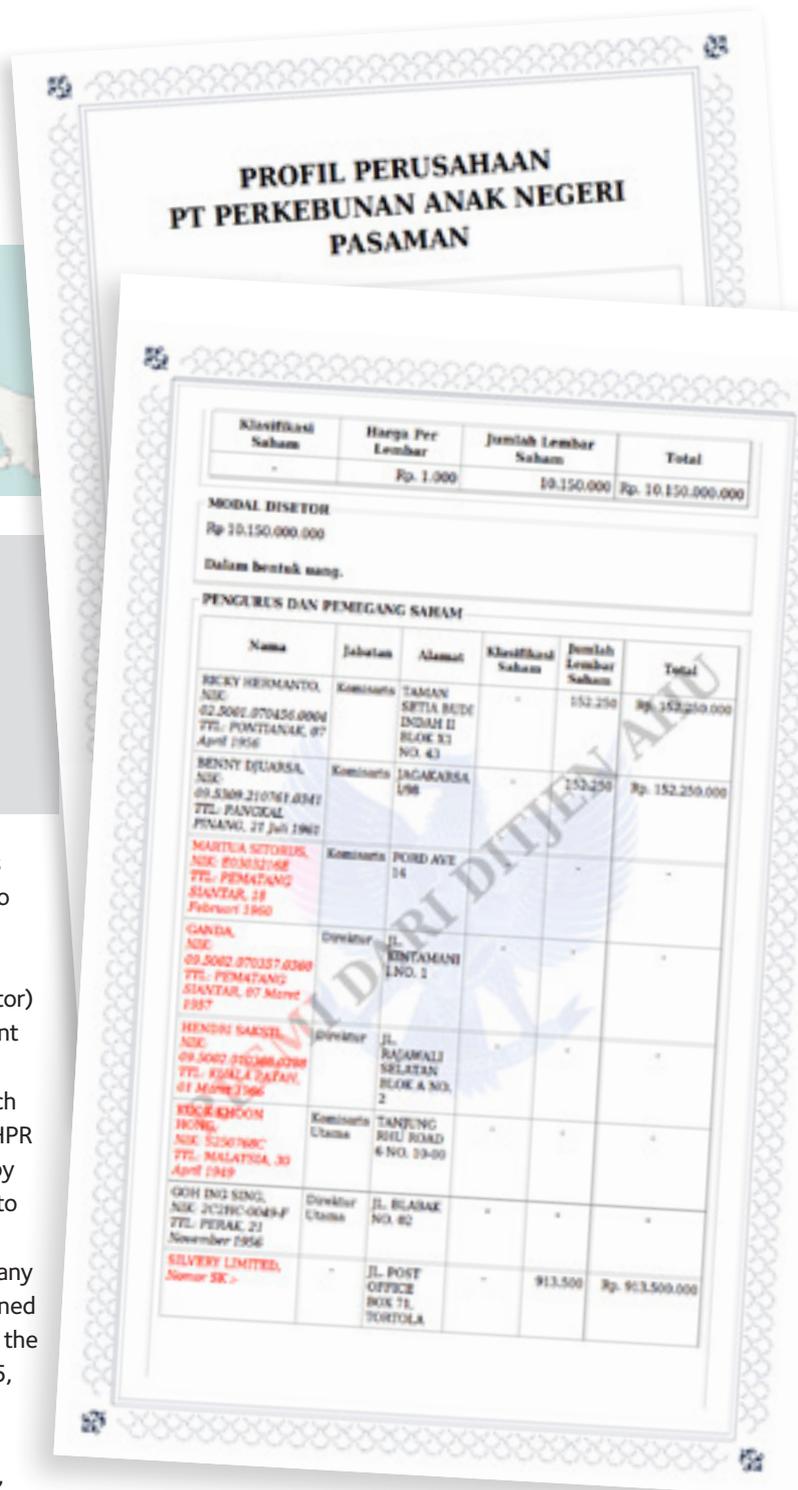
One example of the blurred lines between the two sides of the empire is PT PANP, a plantation company with two concessions in West Kalimantan. It was established in 2008 by Kuok Khoon Hong (Chairman), Martua Sitorus (Commissioner), Ganda (Director), Hendri Saksti (Director) and Wilmar's Head of Plantations, Guh Ing Sing (President Director).⁵⁴ 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 Kuok⁵⁵ and the other, Bonoto Investments Ltd, is linked to and reportedly co-owned by Sitorus.⁵⁶

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.⁵⁷

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

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

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



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.⁶² 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.⁶³ 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.⁶⁴ Most recently, on 19 December 2017, members of

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

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.⁶⁷ 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.⁶⁸

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 Enterprises 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 2016,⁶⁹ is a plantation company in Jambi formerly owned by Wilmar⁷⁰ and involved in a protracted land conflict with the Suku Anak Dalam indigenous group.⁷¹

In February 2011, Forest Peoples Programme (FPP) and community members brought a complaint against Wilmar and PT AP to the RSPO.⁷² 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'.⁷³

In 2013, Wilmar sold PT AP to Prima Fortune International and PT AMS,⁷⁴ both Gama companies.⁷⁵ 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',⁷⁶ 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.⁷⁷

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.⁷⁸ 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.⁷⁹

After the 2013 sale, Wilmar claimed to 'no longer purchase FFB or [crude palm oil] from PT AP/BSU'.⁸⁰ In 2016, it stated that it 'would not accept oil from PT Asiatic Persada entering our supply chain',⁸¹ 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).⁸²

PT BSU is now owned by PT Perkebunan Prima Manunggal (PT PPM – 95%) and PT AMS (5%).⁸³ PT PPM is managed by Andy Indigo⁸⁴ 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 2017.⁸⁵

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.⁸⁶

The following year, Wilmar sold a majority stake in PT CRS to PT Wahana Agro Penjasakti, a Gama⁸⁷ company with an offshore owner, Team Ventures Investments Ltd.⁸⁸ Under Gama, PT CRS continued to purchase illegal FFB,⁸⁹ and according to its most recent supply chain information Wilmar continued sourcing from PT CRS.⁹⁰

'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

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 2013,⁹¹ 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.⁹² 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.⁹³



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.⁹⁴

0 1 2 3 4 5 KM
0 1 2 3 4 5 M
Scale 1:300,000

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.⁹⁵

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.⁹⁶

The PT GAN concession overlaps with some 4,500ha of orangutan habitat.⁹⁷ 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.⁹⁸

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.⁹⁹

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.¹⁰⁰

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

PT GAN has recently opened a new palm oil mill within its concession.¹⁰³ 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.¹⁰⁴ 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.¹⁰⁵

Less than a year later, plans had evidently changed: the company was issued with a location permit in Merauke,¹⁰⁶ and four months later a majority stake in PT ACP was transferred to Fullest Holdings Ltd.¹⁰⁷ Ganda was briefly Commissioner of PT ACP in June 2010.¹⁰⁸

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.¹⁰⁹

Between 2015 and 2017, PT ACP cleared 3,190ha of forest.¹¹⁰ 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.¹¹¹ By October 2017, PT ACP had started cutting new plantation blocks in that area. Forest clearance has continued in 2018.¹¹²

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,¹¹³ 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;¹¹⁴ 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.¹¹⁵ 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.¹¹⁶ The clan refused to back down, however, and as of September 2017 no agreement had been reached.¹¹⁷

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.¹¹⁸ 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.¹¹⁹

Between January 2016 and August 2017, PT APM cleared 2,500ha of forest. Forest clearing has continued in 2018.¹²⁰

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.¹²¹ 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.¹²²

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.¹²³



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

December 2015 source: Google Earth



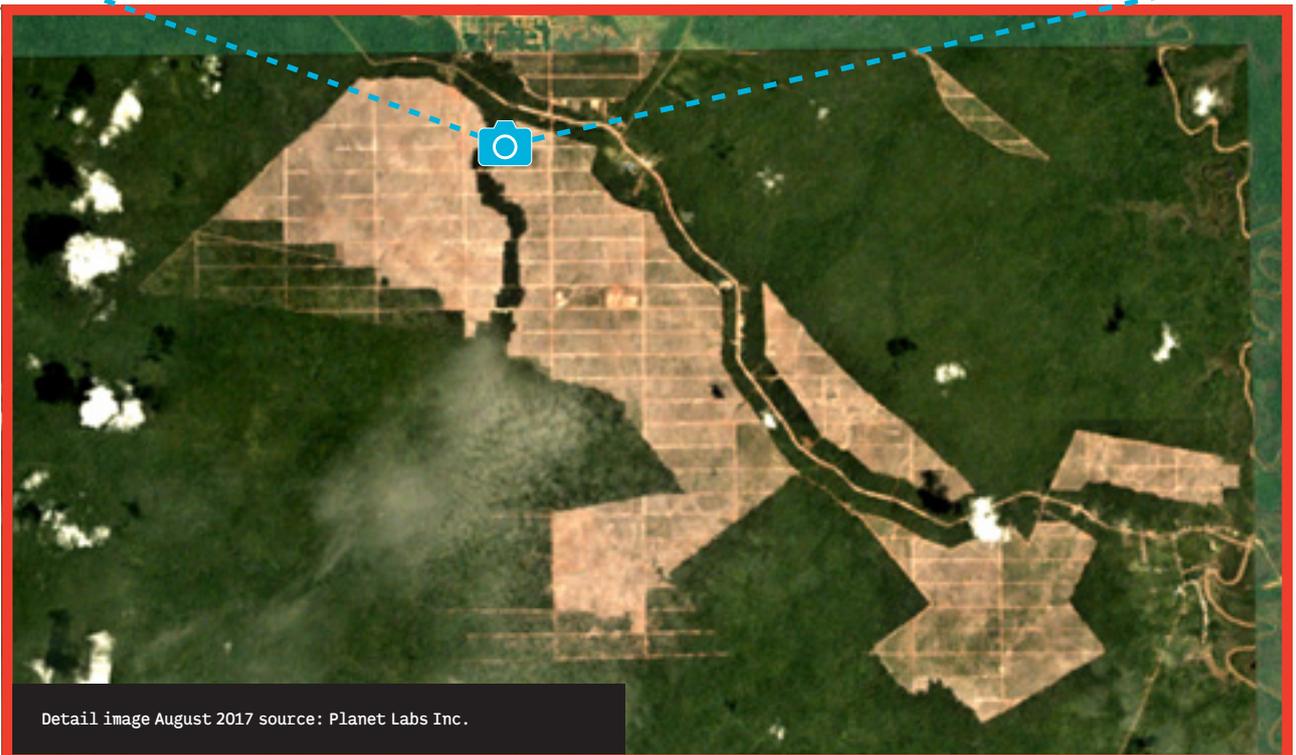
JANUARY 2018

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 mills¹²⁴ – 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'.¹²⁵

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.¹²⁶

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,¹²⁷ 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.¹²⁸ 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,¹²⁹ even though Wilmar's own data lists PT CRS as both the mill name and company name.¹³⁰ 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,¹³¹ even though Wilmar's own traceability data fails to include accurate parent company information.¹³² 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 data¹³³ of traders with publicly available traceability dashboards: AAK,¹³⁴ Apical/Asian Agri,¹³⁵ Bunge Lodders Croklaan (previously IOI Lodders Croklaan),¹³⁶ Cargill,¹³⁷ Golden Agri-Resources (GAR),¹³⁸ Musim Mas,¹³⁹ Olam,¹⁴⁰ Sime Darby¹⁴¹ and Wilmar.¹⁴²

Greenpeace also analysed the most recent traceability information that major brands have disclosed publicly: Colgate-Palmolive,¹⁴³ Ferrero,¹⁴⁴ General Mills,¹⁴⁵ Hershey,¹⁴⁶ Kellogg's,¹⁴⁷ Mars,¹⁴⁸ Mondelez,¹⁴⁹ Nestlé,¹⁵⁰ PepsiCo,¹⁵¹ Procter & Gamble,¹⁵² PZ Cussons,¹⁵³ Reckitt Benckiser¹⁵⁴ and Unilever¹⁵⁵ all make this information available.¹⁵⁶

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'Oréal¹⁵⁷ 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).¹⁵⁸

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.¹⁵⁹

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 INTERNATIONAL¹⁶⁰

Traders that report sourcing from Wilmar include AAK, Bunge Lodders 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 Lodders Croklaan, Cargill, GAR, Musim Mas, Olam, Sime Darby and Wilmar are identified as receiving palm oil from Gama mills in 2017.



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

'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.' ¹⁶¹

INDONESIAN MINISTRY OF AGRICULTURE, 2013 REGULATION

©Sukarno/Greenpeace



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,¹⁶³ in the legal as well as the familial sense. The pairing also satisfies the definition of a group enshrined in both Indonesian law¹⁶⁴ and the RSPO’s membership rules.¹⁶⁵

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.¹⁶²

RSPO MEMBERSHIP RULES 2016

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.

'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

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



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.¹⁶⁶

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 Khoon 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 Khoon Ean
5. Mr Kuok Khoon 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 Khoon Hong (Chairman)
2. Mr Pua Seck Guan

Wilmar Share Purchase Committee

1. Mr Kuok Khoon 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 46th 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

APPENDIX ONE: SITORUS FAMILY LINKS TO PALM OIL HOLDING COMPANIES

| COMPANY | ACKNOWLEDGED BY ANDY INDIGO AS PART OF THE GAMA GROUP | GANDA | ANDY INDIGO | DARWIN INDIGO | MUTIARA | TJHIN TEN CHUN | CLEMENT ZICHRANG | FELIX VINCENT ANG | BERTHA | CLIFFORD HERBERT THEODORE | CLIFTON HERBERT THEODORE | THIO IDA SAKSTI | HENDRI SAKSTI | ULTIMATE HOLDING |
|--------------------------------------|---|-------|-------------|---------------|---------|----------------|------------------|-------------------|--------|---------------------------|--------------------------|-----------------|---------------|---|
| PT Agri Indigo Pratama | | | X | | | | | | | | | | | Family |
| PT Agro Ganda Indigo | | | X | | | | | | | | | | | Family |
| PT Agro Mandiri Semesta | | | | | | X | | | | | | | | Family |
| PT Ganda Indigo Nusantara | | X | X | | | | | | | | | | | Family |
| PT Ganda Sawit Utama | X | | X | | | | | | | | | | | Family |
| PT Ganda Tambang Pratama | | | X | | | | | | | | | | | Family |
| PT Ganda Mahana Cakrawala | | X | X | | | | | | | | | | | Family |
| PT Ganda Mahana Dinamika | | | X | | | | | | | | | | | Family |
| PT Indigo Dinamika | | | X | | | | | | | | | | | Family |
| PT Indigo Sawit Utama | | X | X | | | | | | | | | | | Family |
| Indopa Im Plantation Pte Ltd | | | X | | | | | | | | | | | Prime Track Ltd |
| PT Nusa Prima Energi | | X | X | | | | | | | | | | | Prime Track Ltd |
| PT Nusantara Adiperkasa | | X | X | | | | | | | | | | | Family |
| PT Perkebunan Prima Manunggal | | | X | | | | | | | | | | | Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd |
| PT Prakarsa Cakrawala | | | | | | | | | X | | | | | Family |
| Incerinusa | | | | | | | | | | X | | | | Family |
| PT Prima Panca Lestari | | X | X | | | | | | | | | | | Capital Ocean Ventures Ltd |
| S&G Biofuel Pte Ltd | | | | X | | | | | | | | | | Family |
| PT Semesta Buana Gemi Lang | | | | | | | | | | | | X | | Athena City Holdings Ltd |
| PT Sumatera Tekindo | | | | | X | | | | | | | | | Family |
| PT Wahana Agro Indonesia | | | | | | X | | | | | | | | Family |
| PT Wahana Agro Pancasakti | | | | | | | | X | | | | | | Capital Ocean Ventures Ltd, Tean Ventures Investments Ltd, Silvery Ltd |
| PT Wahana Gemi Lang | | | | X | | | | | | | | | | Family |
| PT Wahana Indigo | | X | X | | | | | | | | | | | Gama Xs |
| PT Wahana Karya Agrinusa | | | X | | | | | | | | | | | Family |
| PT Wahana Perkebunan Indonesia | | | | | | | X | | | | | | | Capital Ocean Ventures, Family |
| PT Agri Sentosa Gandadigo (PT ASG) | | | X | | | | | | | | | | | Family |
| PT Agrinusa Persada Mulia (PT APM) | | X | | | | | | | | | | | | Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd, Family |
| PT Agripriama Cinta Persada (PT ACP) | | X | | | | | | | | | | | | Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd |
| PT Agro Alam Nusantara | | | | | | | | | | | | | X | Family, Other (minority) |
| PT Agro Lintas Nusantara | | | | | | | | | | | | | | Family, Gama Xs |
| PT Alam Jaya Persada | | X | | | | | | | | | | | | Family |

SITORUS FAMILY LINKS TO PLANTATION AND OTHER OPERATIONAL COMPANIES

| | | | | | | | | | | | | | | | | | |
|---|---|--|--|--|--|--|--|--|---|---|--|--|--|--|--|--|---|
| 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, Family Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd |
| PT Citra Mahkota | X | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd, Team Ventures Investments Ltd, Silvery Ltd, Family |
| PT Citra Riau Sarana | X | | | | | | | | X | X | | | | | | | Capital Ocean Ventures Ltd, Family Other (JV) |
| PT Energi Unggul Persada | | | | | | | | | | | | | | | | | Athens City Holdings, Family |
| PT Gandaerah Hendana | | | | | | | | | | | | | | | | | Other (JV) |
| PT Grana Agro Nisantara | X | | | | | | | | X | X | | | | | | | Capital Ocean Ventures Ltd, Family |
| PT Indokahun Unggul PT Inecda | | | | | | | | | | | | | | | | | Silvery Ltd, Family |
| PT Intitama Berlian Perkehuman | X | | | | | | | | | | | | | | | | Athens City Holdings, Family, Other (JV) |
| 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 | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd, Family, Gama Xs |
| PT Karya Palmalindo Abadi | | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd, Family |
| PT Maju Perkasasawit | | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd, Fullest Holdings Ltd, Rise Glory Interprises Ltd, Silvery Ltd, 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 | | | | | | | | | | | | | | | | Bonoto Investment Ltd |
| | | | | | | | | | | | | | | | | | Rescive Investments Ltd |
| | | | | | | | | | | | | | | | | | HPR Investments Ltd |
| | | | | | | | | | | | | | | | | | Silvery Ltd |
| PT Putralirik Domas | X | | | | | | | | | | | | | | | | Other (minority) |
| | | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd |
| PT Rajawali Jaya Perkasa | | | | | | | | | | | | | | | | | Family |
| PT Sawit Unggul Agro Niaga | | | | | | | | | | | | | | | | | Family |
| PT Sentosa Asih Makmur | X | | | | | | | | | | | | | | | | Other (minority) |
| PT Serdang Hulu | | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd |
| PT Subur Sawit | | | | | | | | | | | | | | | | | Family |
| PT Platinum | | | | | | | | | | | | | | | | | Family |
| PT Swadaya | | | | | | | | | | | | | | | | | Other (JV) |
| Indopalma | X | | | | | | | | | | | | | | | | Family |
| PT Sumatera Unggul Makmur | X | | | | | | | | | | | | | | | | Other (minority) |
| PT TH Indo | X | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd |
| Plantations Sentra Buana | X | | | | | | | | | | | | | | | | Family |
| | | | | | | | | | | | | | | | | | Prime Track Ltd |
| | | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd |
| | | | | | | | | | | | | | | | | | Fullest Holdings Ltd |
| | | | | | | | | | | | | | | | | | Rise Glory Interprises Ltd |
| | | | | | | | | | | | | | | | | | Silvery Ltd |
| | | | | | | | | | | | | | | | | | Family |
| | | | | | | | | | | | | | | | | | Other (JV) |
| PT Wahana Karya Sejahtera Mandiri | X | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd |
| | | | | | | | | | | | | | | | | | Fullest Holdings Ltd |
| | | | | | | | | | | | | | | | | | Rise Glory Interprises Ltd |
| | | | | | | | | | | | | | | | | | Silvery Ltd |
| | | | | | | | | | | | | | | | | | Family |
| PT Wawasan Kebun Nusanantara | X | | | | | | | | | | | | | | | | Capital Ocean Ventures Ltd |

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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)
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- 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>.
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- 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)
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- 49 Compliance Advisor/Ombudsman (2009) p17
- 50 The concession is also known as PT Jatim Jaya Perkasa. See Wilmar International Ltd (2013c).
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- 75 At the time of the sale, Gama was known as Ganda Group.
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- 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.
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