

COMMUNITY RELATIONS POLICY

Purpose and scope

The Group recognises that local communities, indigenous people and smallholders are strategically important to the success and long-term sustainability of its operations. The Group is committed to conducting its operations in a manner that respects the rights, livelihoods, cultures, traditions, and wellbeing of local communities and indigenous people, particularly where operations may affect land, resources, livelihoods, or the environment.

The Group commits to ensure full compliance with all applicable national and international laws and regulations and to adhere to the requirements of relevant certification standards, including the Principles and Criteria of the Roundtable on Sustainable Palm Oil (“RSPO”), the International Sustainability and Carbon Certification (“ISCC”) framework, and the Indonesian Sustainable Palm Oil (“ISPO”) standard.

This policy aligns with the requirements of applicable sustainability standards, as well as with relevant international conventions, agreements and frameworks, including the United Nations Declaration on the Rights of Indigenous Peoples (“UNDRIP”), the United Nations Declaration on Human Rights Defenders, the FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests, and the UN Sustainable Development Goals.

The policy addresses the following focus areas:

- Rights of indigenous peoples
- Land rights and free, prior and informed consent
- Social impact management
- Grievances and remediation
- Community livelihoods and local economic development
- Smallholder inclusion and co-operatives
- Security practices
- Human rights defenders

This policy applies to all the Group’s palm-oil operations in Indonesia, and head office in the United Kingdom. The Group’s employees, contractors, consultants, smallholders, vendors, suppliers, and guests are required to adhere to the policy.

Responsibilities and implementation

The board has overall responsibility for oversight of this policy and its implementation, consistent with the board's responsibilities of overseeing the company's sustainability and environmental, social, and governance ("ESG") matters and ensuring that sustainability is integrated into the company's strategy and decision-making.

Responsibility for the operational implementation of this policy rests with senior management and relevant operational functions. Management at all levels contribute to supporting the effective implementation of this policy and embedding the commitments outlined in this policy into the day-to-day operations, procedures, and business practices of the Group.

Review

This policy shall be reviewed periodically to ensure continued relevance, effectiveness and alignment with evolving international frameworks, standards and industry best practices. to reflect evolving legal requirements, international standards, industry best practices, and stakeholder expectations.

POLICY STATEMENTS

Rights of indigenous peoples

The Group is committed to respecting the rights, dignity, cultures, and identities of indigenous peoples and to conducting its operations in a manner that respects and supports their internationally recognised rights.

The Group commits to:

- i. Respect the customs, cultures, traditions, heritage, and religious beliefs of Indigenous Peoples and local communities, in accordance with applicable laws and internationally recognised human rights principles;
- ii. Respect customary leadership structures, governance systems, and decision-making processes. The Group will not seek to influence or manipulate community decisions and will engage only through culturally appropriate processes;
- iii. Promote equality and prohibit discrimination against indigenous individuals and communities;
- iv. Engage with indigenous peoples in a respectful, transparent and culturally appropriate manner;
- v. Protect sites, objects, and areas of cultural or spiritual significance and respect traditional customs, ceremonies and cultural practices; and
- vi. Respect the rights of indigenous peoples to own, use, manage, and control their lands, territories and natural resources.

Land rights and free, prior and informed consent

The Group recognises and respects all legal, communal, and customary rights to land ownership and the rights to use, manage and control land and will avoid infringing on legitimate land tenure rights. Free, prior and informed consent (“FPIC”) shall be upheld in relation to activities that may affect the lands, territories, resources, or livelihoods of indigenous peoples and local communities.

Prior to commencing new developments or activities that may affect land or resource rights, the Group will:

- i. Provide communities with accurate, accessible, and transparent information regarding the nature, scale, risks, impacts and potential benefits of proposed activities;
- ii. Ensure that stakeholder engagement and consultation processes are inclusive and provide opportunities for the meaningful participation of women, indigenous peoples and other vulnerable or marginalised groups.
- iii. Ensure that consultation processes are conducted freely and without coercion, intimidation, manipulation or undue influence; and
- iv. Respect the right of communities and land users to withhold or reject consent for proposed developments or conservation initiatives.

Social impact management

The Group seeks to identify, assess, and manage potential social impacts associated with its operations.

The Group commits to:

- Respect the values, needs, livelihoods, and cultural practices of local communities, with particular consideration for women, indigenous peoples and other vulnerable or marginalised groups.
- i. Engage proactively with stakeholders to identify and understand social risks, concerns and expectations;
- ii. Implement measures to prevent, minimise, or mitigate adverse social impacts arising from its operations; and
- iii. Monitor the effectiveness of social impact management measures and seek continual improvement where appropriate.

Grievances and remediation

The Group will handle complaints, grievances and conflicts responsibly, through open and constructive engagement with complainants and stakeholders.

The Group commits to:

- i. Provide accessible grievance mechanisms that enable any individual or group to raise concerns or submit complaints relating to the Group's operations safely, freely, and without fear of intimidation, retaliation, discrimination or other adverse consequences;
- ii. Ensure that complaints and grievances are assessed, investigated, and resolved in a timely, fair, impartial, and transparent manner. Where the Group has caused or contributed to adverse impacts, it will provide for or cooperate in appropriate remediation and implement corrective actions; and
- iii. Engage with smallholders, vendors, consultants, contractors, and suppliers to address policy non-compliance through appropriate corrective and remediation actions. The Group will require the timely implementation of agreed corrective action plans and may suspend or terminate business relationships where parties fail to implement or comply with agreed remediation requirements.

Community livelihoods and local economic development

The Group aims to contribute positively to the social and economic development of communities located near its operations.

The Group commits to:

- i. Prioritise local employment and business opportunities where feasible;
- ii. Source goods and services from local businesses and contractors where appropriate;
- iii. Support training and capacity-building initiatives relating to sustainability and livelihoods;
- iv. Maintain constructive engagement and communication with local communities and government authorities;
- v. Maintain a discretionary fund that may be used to support education, health, water, sanitation, power and transport infrastructure of local communities; and
- vi. Prohibit the use of community investment funds for political contributions or political activities.

Smallholder inclusion and co-operatives

The Group supports equally the improved livelihoods and inclusion in sustainable palm oil value chains of both independent smallholders surrounding the Group's own areas and 'scheme smallholders' managed by the Group.

The Group commits to:

- i. Support the establishment and operation of smallholder co-operatives that promote economic development of the local community;

- ii. Provide fair and inclusive support and incentives to smallholders, including capacity-building, technical support, access to sustainable agricultural practices and technologies and fair prices;
- iii. Respect the right of workers and smallholders to voluntarily participate in co-operatives without coercion; and
- iv. Promote progress towards sustainable production and certification among scheme and independent smallholders.

Security practices

Where security personnel are required, the Group will ensure that security arrangements are implemented responsibly and only where necessary for the protection of employees, assets, and facilities against legitimate security threats.

The Group commits to:

- i. Prohibit the use of violence, intimidation, threats, or coercion against communities or stakeholders;
- ii. Prohibit the use of military or mercenary forces to resolve disputes with local communities; and
- iii. Ensure that security personnel act in accordance with applicable laws, human rights principles and the Group's policies.

Human rights defenders

The Group recognises that human rights defenders play an important role in promoting and protecting universally recognised human rights and fundamental freedoms. Human rights defenders may include environmental defenders, whistleblowers, complainants, workers' representatives, trade union members, community spokespersons and other individuals or groups who peacefully raise concerns regarding actual or potential adverse impacts associated with the Group's activities. The term does not extend to individuals or groups who incite, advocate, or engage in violence.

The Group commits to:

- i. Respect the rights of individuals and groups to raise concerns, express opinions, participate in consultations, access grievance mechanisms and engage with the Group;
- ii. Prohibit threats, reprisals, retaliation, discrimination, or any adverse action against human rights defenders who, in good faith, report concerns, submit complaints, participate in investigations, or engage in legitimate human rights or environmental advocacy related to the Group's operations, business relationships or supply chain;
- iii. Protect the confidentiality and identity of human rights defenders; and

- iv. Seek to ensure an adequate, thorough, impartial, and prompt investigation of reports made by human rights defenders and put in place the remediation required, if found valid.

Reviewed and approved by the board:

June 2026

Review history:

October 2021 (First issue)