

## Neste's Renewable Raw Material Grievances (May 2024)

No	Target of grievance	Relationship with Neste (Direct/Indirect raw material sourcing/Other)	Parent Company Group	Grievance raiser/report/link	Status
1	Felda Global Ventures (FGV)	Indirect raw material via IOI, Genting, Mewah & Wilmar	Felda Global Ventures (FGV)	<a href="#">U.S. Customs and Border Protection</a>	<p>[MONITORING] January 2024: According to a <a href="#">press release</a> of FGV, FGV has carried out several initiatives, including:</p> <ul style="list-style-type: none"> <li>- Reimbursed RM 72.2 million to 19673 workers. The reimbursement practice was verified by LRQA, an assurance company formerly known as ELEVATE;</li> <li>- For former workers, FGV had reimbursed RM 1.77 million and has set up a reimbursement programme which will be carried out until the end of 2024;</li> <li>- Strengthened its recruitment procedures with recruitment agencies by having an assessment and capacity building programme to be facilitated by LRQA, contract provision stipulating the obligation of recruitment agencies to reimburse workers who claim to have made any form of fee during recruitment, and LRQA to survey newly recruit workers to ascertain if they had paid recruitment fees.</li> </ul> <p>FGV has planned to submit a petition to the US CBP by the end of second quarter in 2024.</p> <p>September 2023: According to FGV's media release on FY2022 financial performance, FGV is implementing ELEVATE's recommendations and expects to submit the final report to the U.S. Customs and Border Protection. FGV will reimburse current and former foreign workers, who were employed after 27 June 2019 for recruitment fees in three tranches between March and September 2023. Additionally, a sinking fund has been established for former workers who paid recruitment fees during their tenure but are no longer employed by FGV. For more information, please refer to the company's <a href="#">press release</a>.</p> <p>March 2023: According to our direct supplier, FGV is in the process of developing and implementing a remediation plan based on the outcomes of ELEVATE's assessments. The remediation plan will be verified by ELEVATE. For more information, please refer to <a href="#">IOI's grievance log</a>.</p> <p>August 2022: FGV commits to implementing action plans to strengthen its labour practices since it became a participating company of the Fair Labor Association (FLA) in 2019.</p>

				<p>Between November 2021 and January 2022, the FLA conducted Independent External Assessment (IEA) at FGV's headquarters in Kuala Lumpur and at the field level (mills and estates). In August 2022, the IEA-report, outlining the findings and action plans, is published on both FGV and FLA's websites (<a href="https://www.fgvholdings.com/press_release/fgv-continues-to-uphold-internationally-recognized-labour-standards-as-part-of-its-sustainability-agenda/">https://www.fgvholdings.com/press_release/fgv-continues-to-uphold-internationally-recognized-labour-standards-as-part-of-its-sustainability-agenda/</a>, <a href="https://www.fairlabor.org/reports/fgv-action-plan-background-and-summary/">https://www.fairlabor.org/reports/fgv-action-plan-background-and-summary/</a>).</p> <p>16 November 2021: FGV has appointed ELEVATE as the independent auditing firm to conduct an assessment of FGV's operations against the 11 International Labour Organization (ILO) Indicators of Forced Labour. The assessment is part of FGV's efforts towards petitioning for the revocation of the WRO by the CBP. Elevate is an independent sustainability and supply chain service provider with vast experience in advancing social compliance and addressing forced labour risks by applying a worker-centric approach.</p> <p>FGV had discussions with their US-based legal counsel and Elevate on the audit design and plan, which is expected to begin in November 2021.</p> <p>20 October 2021: FGV is committed to taking all the necessary steps towards lifting the WRO, including the appointment of an independent auditing firm to conduct an assessment of FGV's operations against the 11 International Labour Organization (ILO) Indicators of Forced Labour, as advised by the CBP.</p> <p>FGV has identified an independent auditor to carry out the audit work and is currently working with a US-based legal counsel to finalise the terms and conditions for the appointment. In ensuring that the scope and methodology of the audit meet the requirements and expectations of the CBP, FGV foresees a slight delay in the appointment and expects to formalise the appointment by November 2021.</p> <p>30 August 2021: <a href="https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/">https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/</a></p> <p>1 July 2021: <a href="https://www.fgvholdings.com/wp-content/uploads/2021/07/FGV-Sustainability-Updates-1-July-2021.pdf">https://www.fgvholdings.com/wp-content/uploads/2021/07/FGV-Sustainability-Updates-1-July-2021.pdf</a></p> <p>1 April 2021: FLA Assessment Report on the Implementation of FGV's Action Plan to Enhance Labour Practices 3 key areas of focus as recommended by</p>
--	--	--	--	--

				<p>FLA; grievance mechanism, remediation procedures and worker representation structures</p> <p>FGV is committed to resolving the matter with the CBP and will revisit the appointment of an independent firm in June 2021 for a comprehensive external audit on FGV's labour practices, as suggested by the CBP.</p> <p>27 January 2021: FGV has decided to take a systematic approach in ensuring that the rights of its workers are respected and protected, thereby eliminating practices that may be indicative of labour exploitation. This is to ensure that the best labour practices are observed in accordance with international standards throughout its entire operations. FGV has decided to revisit the appointment of an independent third-party audit firm for an audit of FGV's operations after FGV is satisfied that all of the above measures have been strengthened and implemented accordingly, within six months. FGV will continue to engage with the CBP to keep them abreast of the various measures undertaken and its other ongoing initiatives pertaining to labour rights, and FGV is committed to resolving the matter as expeditiously as possible.  <a href="https://www.fgvholdings.com/wp-content/uploads/2021/01/FGV-Sustainability-Updates-January-2021.pdf">https://www.fgvholdings.com/wp-content/uploads/2021/01/FGV-Sustainability-Updates-January-2021.pdf</a></p> <p>3 December 2020:  <a href="https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-withhold-release-order-wro-issued-by-u-s-customs-and-border-protection-cbp/?pagen=1%5C">https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-withhold-release-order-wro-issued-by-u-s-customs-and-border-protection-cbp/?pagen=1%5C</a></p> <p>13 October 2020: FGV is not a direct supplier; however, Neste decided not to make any further purchases from supply chains that are verifiably traced back to FGV until the allegations by US Customs and Border Protection (CBP) have been sufficiently cleared. No further information about CBP's findings including nature or locations of any incidence were disclosed.</p>
2	PT Binasawit Abadi Pratama (PT BAP)	Direct Supplier	GAR	<p><u>Friends of the Earth Netherlands</u></p> <p>[MONITORING] April 2024: The case is still under investigation by the independent investigator appointed by the RSPO. According to Neste's understanding, GAR has also responded to the RSPO in March 2024. Neste will monitor the progress of the case and will provide updates whenever there are new developments or when the case is resolved.</p> <p>The detailed progress of the RSPO complaint progress can be found on the RSPO's <a href="#">Complaints Portal</a>.</p>

				<p>Between 2021 to 2023: The RSPO complaint process progressed through several key stages, including finalising of the Terms of Reference (ToR) for an independent investigator, conducting face-to-face meetings with complainants and respondents, appointing independent investigator and commencing the investigation in August 2023.</p> <p>22 December 2020: GAR submitted additional documents <u>on GIS Analysis to the RSPO</u>.</p> <p>25 November 2020: The Complainants have provided their response on the difference on the hectarage clearance. Pending confirmation from the GIS team.</p> <p>October 2020: Case is currently being handled by the RSPO Complaints Panel. The Secretariat is waiting for a response from the Respondent on the issues pertaining land clearing and the final remark from the GIS team.</p> <p>April 2020: The key points of GAR's response to the FPP complaints to the RSPO are as follows:</p> <ol style="list-style-type: none"><li>1. Allegation that GAR failed to secure necessary permits for eight (8) concessions in Central Kalimantan: the complex issue of obtaining permits in Indonesia affects all companies and is not peculiar to GAR. It is also a well-known issue to stakeholders including the RSPO. GAR has submitted evidence of the various legal changes that have occurred over the years re the allocation and designation of land for palm oil plantations. Through all the legislative changes, GAR and its subsidiaries have complied with the applicable and valid regulations at the time and have therefore been operating legally</li><li>2. Allegation that GAR and its subsidiaries failed to comply with RSPO New Planting Procedures: this is factually incorrect and without basis. GAR has submitted a list of documents verified by the RSPO certification body and submitted to the RSPO in 2014. In addition, GAR highlighted that the only new planting since 2014 has been to fulfil plasma development for the community. In this, GAR has also filed all the necessary documentation for the plasma development.</li><li>3. Allegation of unethical behaviour by GAR: the claims by FPP are factually incorrect. Since October 2018 when the corruption case was instigated GAR and its subsidiary PT BAP have been transparent about the case, the fact that the individuals in question acted of their own accord and in breach of the company's Code of Conduct. This was proven in the decision of the Jakarta</li></ol>
--	--	--	--	---

				<p>Corruption Court which also ruled that the incident reflected the actions of a few individuals in breach of Government Regulations as well as GAR's own Code of Conduct. Neither GAR nor PT BAP were parties to the case. Therefore, claims that either company acted unethically are without basis.</p> <p>GAR awaits the deliberation of the Complaints Panel and hopes that there will be a swift closure of this matter. For more information, refer to GAR's statement (<a href="#">2018</a> and <a href="#">2020</a>).</p> <p>March 2019: GAR acknowledges the findings of the Jakarta Corruption Court in the matter of three executives of PT Binasawit Abadipratama accused of bribery of government officials and hopes that this now draws a line under this unfortunate and regrettable incident.</p>
3	Rimbunan Hijau	Not in supply chain, but part of indirect supplier parent company group (Rimbunan Hijau -> Olenex)	Rimbunan Hijau	<p><u>Global Witness</u> (GW)</p> <p>[MONITORING] September 2023: We followed up with our supplier, and they informed us that the process is still ongoing.</p> <p>7 October 2021: GW released a public report titled 'The True Price of Palm Oil'. The allegations on RH in this report are largely similar to the letter that was sent to Wilmar's customers in July 2021. The report, however, contains additional information related to RH's health and safety practices.</p> <p>Our supplier, Wilmar, continues to monitor and investigate the remaining issues related to worker PPE Provision and RH's safety and health practices, and will guide RH towards resolution of this case.</p> <p>More info can be found here: <a href="https://www.wilmar-international.com/sustainability/grievance-procedure">https://www.wilmar-international.com/sustainability/grievance-procedure</a></p> <p>July 2021: A letter was sent to Wilmar's customers from the NGO Global Witness (GW), alleging environmental and social non-compliance incidents by Rimbunan Hijau (RH). A summary of the allegations in the letter were as follows:</p> <ul style="list-style-type: none"> <li>- Environmental degradation and deforestation activities;</li> <li>- Violence and harassment against community members, through local police;</li> <li>- Lack of Free, Prior, Informed Consent (FPIC) prior to development of land;</li> <li>- Decent accommodation and facility for employees living in company housing;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>- Workers' health and safety.</li> </ul> <p>Wilmar immediately reached out to RH for clarification on the issues raised by GW, and has been actively engaging with the company since. RH has rebutted</p>

					<p>the allegations and provided us with all relevant documents which include:</p> <ul style="list-style-type: none"> <li>- A field visit report by an independent consultant;</li> <li>- Evidence of engagements between RH and GW since 2017;</li> <li>- Landowner consent forms to ascertain FPIC and identify cultural sites that require protection;</li> <li>- Voluntarily written statements by a landowner, contents of which were further corroborated by a statement given by a local ward councillor;</li> <li>- Correspondence between Gilford Ltd and the Royal Papua New Guinea (PNG) Constabulary;</li> <li>- Board meeting minutes by landowner companies; and</li> <li>- A mediated agreement between Gilford Ltd and a landowner company issued by the PNG National Court.</li> </ul>
--	--	--	--	--	--

Neste does not operate any palm oil refineries, plantations and is not a palm oil trader.

Direct suppliers refers to parent company groups that have a direct business relationship with Neste.

Indirect suppliers refers to parent company groups that do not have a direct business relationship with Neste.

#### Neste's No-Buy List

No	Suppliers / Parent Group Companies	Date Suspended	Summary	Engagement with supplier
1	PT BEST	December 2018	Lost of RSPO Membership, an additional requirement of Neste	<ul style="list-style-type: none"> <li>- 4 October 2018: Engagement at supplier's Surabaya HQ with owners/management</li> <li>- 22 November 2018: NDPE/Sustainability Workshop for various departments from PT BEST</li> <li>- 8 January 2019: facilitated discussion supplier with RSPO</li> </ul>
2	PT Tunas Baru Lampung	December 2018	Allegation of deforestation	<ul style="list-style-type: none"> <li>- 8 January 2019: Engagement at supplier's Jakarta HQ with management on severity of issues, received commitment to work on outstanding issues</li> <li>- 21 February 2019: Supplier engagement &amp; workshop planning</li> <li>- 14 March 2019: NDPE/Sustainability Workshop for related departments from operations, sustainability, auditing from PT TBL</li> <li>- 10-11 April 2019: Neste Annual Supplier Workshop attended by 20 palm/pfad supplying companies</li> <li>- 18 July 2019: Engagement at supplier's Jakarta HQ with sustainability Head &amp; Team to further discuss stop-work-order</li> </ul>
3	FGV	October 2020	Allegations of labour issues. U.S. Customs and Border	Purchases from supply chains that are verifiably traced back to FGV on hold

			Protection issued a <u>Detention Order</u> on FGV Holdings Berhad, its subsidiaries and joint ventures.	
4	AA Sawit Sdn Bhd Jernih Kemboja Sdn Bhd	March 2022	Allegation of deforestation, reported by <u>Mighty Earth Rapid Response Report #38</u> .	Purchases from supply chains that are verifiably traced back to AA Sawit Sdn Bhd and Jernih Kemboja Sdn Bhd are put on hold.
5	IndoGunta	December 2022	Allegation of deforestation	Neste requested its direct suppliers to put on hold sourcing from IndoGunta group for Neste's supply chains
6	Indofood / Salim Group	March 2023	Allegations of labour rights violations and deforestation	Neste requested its direct suppliers to put on hold sourcing from Salim group for Neste's supply chains
7	Samling	March 2023	Allegation of deforestation and land conflicts	Neste requested its direct suppliers to put on hold sourcing from Samling group for Neste's supply chains
8	Ciliandry Anky Abadi	March 2023	Allegation of deforestation	Neste requested its direct suppliers to put on hold sourcing from Ciliandry Anky Abadi group for Neste's supply chains
9	PT Teguhkarsa Wanalestari PT Prima Mas Lestari PT Asia Sawit Lestari	March 2023	Alleged ownership linkages with PT Usaha Sawit Unggul and PT Sawit Sukses Sejati, two companies alleged to have been involved in deforestation.	As the beneficial owners of the group of companies cannot be determined and the linkages of these companies to the alleged deforesters cannot be verified based on the information available, we asked our suppliers to exclude the three companies from Neste's supply chains. Please note that the two companies, PT Usaha Sawit Unggul and PT Sawit Sukses Sejati, alleged to have been involved in deforestation, are not in Neste's supply chains. The three allegedly-linked mills reported in the report are linked to us via alleged ownership linkages, not sourcing.

Inclusion of companies or groups on the list above is not an indication of verified wrongdoing. Neste works together with its sustainability partners and suppliers to ensure compliance with its sustainability requirements, and carefully examines the information made available to it. When grievances are brought to our attention and we cannot confirm a company's compliance with our sustainability requirements, we request our suppliers to remove those companies from our supply chains.