



Modern Slavery and Human Trafficking Statement FY2024



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UKMSA Statement

This Statement is published in accordance with the Modern Slavery Act 2015 of the United Kingdom (Section 54). The period of reporting for this Statement is for the year ended 31 December 2024. This Statement serves as a progress report following key actions taken subsequent to Sime Darby Plantation's Modern Slavery and Human Trafficking Statement FY2023.

OUR ORGANISATION, STRUCTURE, AND SUPPLY CHAIN

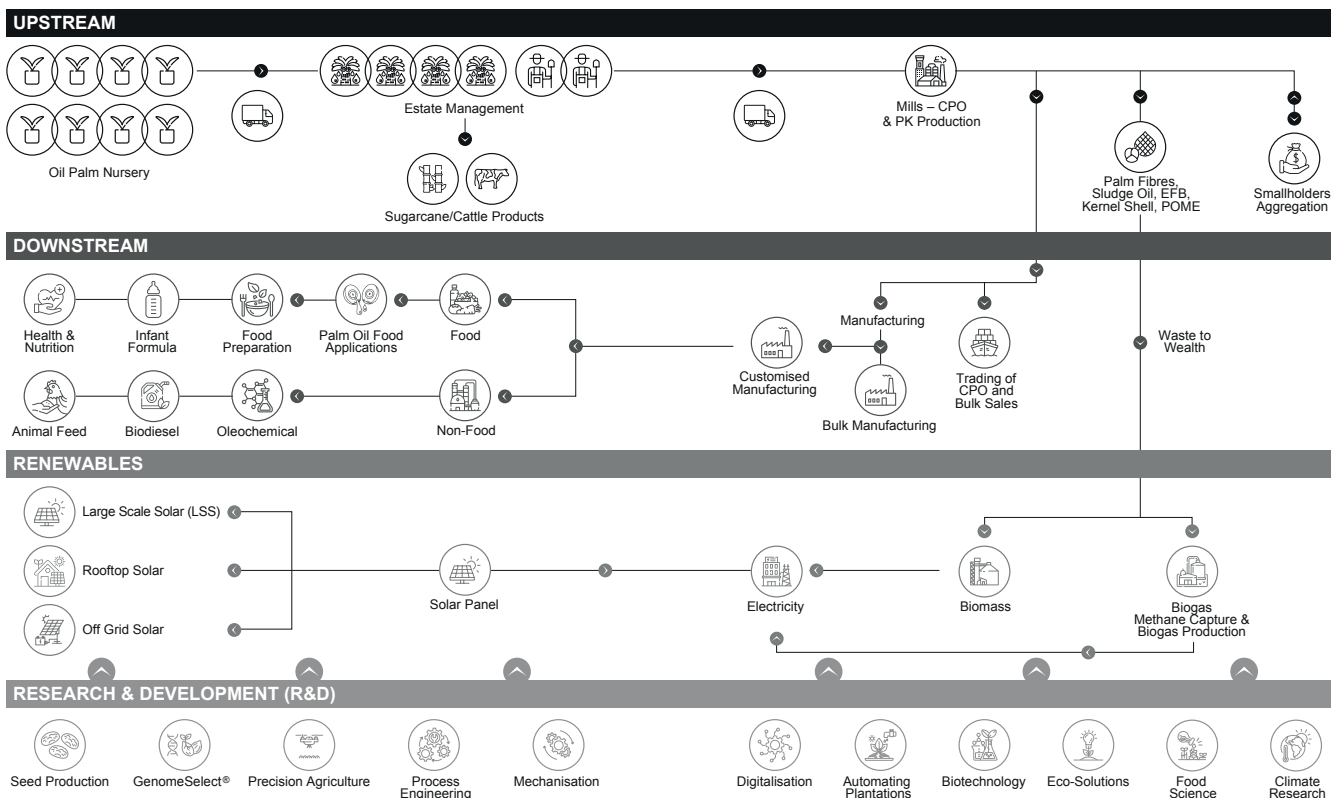
A. About SD Guthrie Berhad

SD Guthrie Berhad ("SD Guthrie" or "the Group"), previously known as Sime Darby Plantation Berhad, is one of the world's largest producers of Certified Sustainable Palm Oil (CSPO) with our operations (mills) certified by leading international and national sustainability certification bodies. As a global integrated plantation company, SD Guthrie is involved in the full spectrum of the palm oil value chain, from upstream to downstream activities, research & development (R&D), renewables, and agribusiness. Our upstream operations, consisting predominantly of oil palm cultivation, harvesting, and milling, are located across Malaysia, Indonesia, Papua New Guinea and Solomon Islands. We also cultivate coconut and sugarcane, and rear cattle for beef production in Papua New Guinea.

Our downstream business (SD Guthrie International), which has a presence in 11 countries, namely the United Kingdom, Malaysia, Indonesia, South Africa, Netherlands, Papua New Guinea, Thailand, Singapore, China, Germany, and United States, is involved in the manufacturing, sales and marketing of oils and fats products, oleochemicals, palm oil-based biodiesel, nutraceuticals, and other derivatives.

In 2024, after announcing our new brand identity, SD Guthrie announced its business plan to embark on two new business verticals – industrial park development and renewable energy.

Our Integrated Value Chain



Further details of our company can be found on our website.

B. Our Supply Chain

As at end of December 2024, SD Guthrie sourced fresh fruit bunches (FFB), crude palm oil (CPO), palm kernel (PK), crude palm kernel oil (CPKO), and refined palm products from over 869 mills, traders, and refineries, mainly from Malaysia, Indonesia, Papua New Guinea, Solomon Islands, and Thailand. We assess traceability of source materials to mills based on volumes supplied to each of our refineries and palm kernel crushers. The details of the supplying mills for each refinery and palm kernel crusher are presented in the respective supplier list on SD Guthrie International's website.

SD Guthrie monitors the compliance of our No Deforestation, No Peat and No Exploitation (NDPE) commitments along our entire supply chain. The traceability of our palm oil supply is therefore crucial to allow for any NDPE issues along the supply chain to be identified and reported, so that effective action can then be taken to address non-compliance and improve overall sustainability practices. For more information on our supply chain, refer to SD Guthrie's website and SD Guthrie's Integrated Report 2024.

OUR COMMITMENTS, POLICIES, PROCEDURES, AND GOVERNANCE

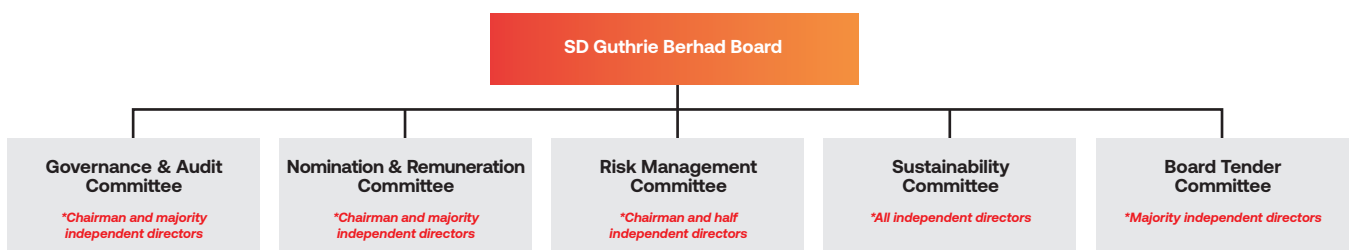
A. Commitments and Governance

At SD Guthrie, we believe that it is our responsibility to respect and uphold the rights of people within our sphere of influence, who mainly comprise our employees, contract workers, and communities surrounding our operations. We integrate the responsibility to respect human rights into our culture, to foster and support appropriate behaviours in all spheres of our business engagements.

As part of our "Beyond Zero" Framework, which was launched in November 2024, we aim to catalyse industry-wide progress by championing and advocating human, land, and labour rights across the sector and beyond. We will achieve this by engaging our own suppliers, industry players, and regulators. We will continuously improve the quality of life of more than 100,000 people in our workforce and the surrounding communities where we operate by providing access to good employment and livelihood opportunities, in addition to investments to improve access to decent living conditions, education, and infrastructure.

The SD Guthrie Main Board's strategic intent, roles, and powers, including those which it delegates to the Management, are outlined in the Board Charter. The Board Charter also establishes the roles of the five Board Committees, namely, the Governance & Audit Committee (GAC), Nomination & Remuneration Committee (NRC), Risk Management Committee (RMC), Sustainability Committee (SC), and Board Tender Committee (TC) (Please refer to the chart below).

The Board Committees assist the Main Board in the discharge of its statutory and fiduciary responsibilities. The SC deliberates on the environmental, social, and governance (ESG) aspects of the Group. In 2024, a key focus during SC meetings was on fair labour practices and workers' welfare in Malaysia, Indonesia, Papua New Guinea, and Solomon Islands. This includes updates on the human rights assessment conducted in Indonesia, responsible recruitment, and closing of major issues raised through SD Guthrie's various grievance channels.



B. Policies and Procedures

SD Guthrie has several policies and procedures in place that underscore our commitment to respecting and upholding human rights across our operations. These policies and procedures clearly set out how we identify and address any human rights issues within our own operations and supply chains.

These policies and procedures are reviewed periodically and revised where necessary, to ensure that they remain relevant and effective. The SD Guthrie Human Rights Charter (HRC), which was revised in 2024, outlines our commitment to respect, support, and uphold human rights. This commitment is also part of our Core Values and is governed by our Code of Business Conduct and our Group Policies & Authorities.

Through our Protection of Human Rights Defenders (HRDs) Policy, SD Guthrie also articulates our approach to ensuring that internal mechanisms are in place to protect human rights complainants and, that we respond to any complaints that are raised. To support this, we have established grievance channels to help all stakeholders raise concerns on any wrongdoing that may be observed in SD Guthrie, without fear of retaliation. The Whistle Blowing Policy and Grievance Channel Standard Operating Procedure, emphasise that all complaints of potential wrongdoings and human rights violations are taken seriously and shall be investigated, regardless of the alleged perpetrator's length of service, position/title, relationship, or connections.

SD Guthrie expects all suppliers of FFB, CPO, and its derivatives, as well as other agricultural commodities, to abide by our Responsible Sourcing Guidelines (RSG). The RSG complements SD Guthrie's Policy Statement on Working with Suppliers to Draw the Line on Deforestation (the Policy Statement). The RSG outlines our requirements for suppliers while the Policy Statement outlines the triggers that may cause a supplier's suspension, and the actions required for us to re-engage with them. The RSG lays out the terms of engagement between SD Guthrie and our suppliers in obtaining their commitment that all products supplied come from legally compliant, environmentally sustainable, and socially responsible sources. It clearly outlines SD Guthrie's expectations of our suppliers, as expressed in the Group's Responsible Agriculture Charter, Human Rights Charter, Vendor Code of Business Conduct, and Vendor Integrity Pledge.

DUE DILIGENCE, RISK ASSESSMENT, AND CONTINUOUS IMPROVEMENT

In Malaysia, SD Guthrie's Social Welfare Services Department (SWS), which was established in April 2022, assists our Upstream Malaysia Operating Units (OU) to better understand and comply with our enhanced labour standards. The department also conducts annual audits to evaluate the adherence to policies, procedures, and systems that we have put in place since 2021. In 2024, SWS completed the audits of all 151 OUs in Upstream Malaysia with 3,141 workers interviewed (representing 11.30% sample size). Continuous improvement initiatives in our Upstream Malaysia OUs are evaluated through an annual ESG scorecard which measures the success of our human rights initiatives with Key Performance Indicators (KPI) on the effectiveness of Grievance Channels, Social Dialogue Practices, and Workplace Safety. These KPIs were further validated by the Workers Satisfaction Survey (WSS). For the year under review, the WSS indicated an improvement in the overall satisfaction rate from 96.2% in December FY2023 to 96.6% in December FY2024. The survey covers workers' awareness and comfort in raising issues over grievance channels, social dialogue effectiveness, supply of Personal Protective Equipment, freedom of movement, and understanding on the calculation of wages. Appropriate consequence management measures were taken on OUs that failed the ESG scorecard.

In Indonesia, workstreams, guided by the International Labour Organisation (ILO) indicators, were established to oversee the implementation of action plans identified through an independent third-party human rights baseline assessment in 2022. The validation of action items implemented is ongoing and will include the wider Human Rights Due Diligence Framework - a structured framework guided by the United

Nations (UN) Guiding Principles on Business and Human Rights that is used to identify risks, formulate actions, track performance, and communicate to our relevant stakeholders.

Enhancing workers' voices in our operations is a key enabler in supporting the effectiveness of our continuous improvement efforts. With our existing Grievance Channels and initiatives such as the Social Dialogue and Oil Palm Pal, an application to track workers' housing repair requests, we continue to ensure that our workers have effective avenues to raise issues relating to work and living conditions, and that their concerns and feedback are properly acted upon.

More information about our continuous improvement initiatives is available in our Integrated Report 2024, Sustainability Report 2024 and on SD Guthrie's website.

Grievance Mechanism

In SD Guthrie, several grievance channels are available to workers to voice their concerns and issues. Whilst workers can raise concerns with their managers and supervisors, formal channels that are independently managed have been established to promote trust and ensure anonymity.

In Malaysia and Indonesia, Grievance Units have been established and centralised at the Head Offices in both countries to capture all complaints and concerns systematically. On a weekly basis, the Grievance Committee (GC) monitors the status of new, ongoing, and resolved complaints to ensure that all are appropriately addressed within established timelines. Cases are handled based on the nature of the investigation required, the severity of the cases in relation to ILO indicators, and the potential threat to workers. All cases are reported to the SC. Any cases of wrongdoing are additionally tracked and monitored by the Whistleblowing (WB) Unit, WB Committee, and the GAC, to ensure that appropriate consequence management actions are taken when any wrongdoing has been found.

In the year under review, a total of 364 cases were received through the Suara Kami (Our Voice) Grievance Channel in Malaysia and Indonesia, and 184 cases through Whistleblowing channels. All cases are monitored for closure within the stipulated timelines.

In Malaysia, the Suara Kami channel is made available in multiple languages, making it easily accessible to the diversified migrant workforce. Operators speak to callers in seven languages namely, English, Bahasa Malaysia, Bahasa Indonesia, Tamil, Hindi, Bengali, and Nepali. In Indonesia, Suara Kami is provided only in Bahasa Indonesia as the workforce comprises mostly Indonesians.

Based on the 24,177 responses received from the WSS, 96.9% of workers were aware of the grievance channels. The effectiveness of the helpline will be monitored in 2025 and supported with more awareness raising initiatives.

Social Dialogues

The Social Dialogue initiative is a formal two-way communication platform between Worker Representatives (WR) and the Management at all OUs. Social dialogues are held regularly to discuss issues related to workers' welfare and concerns. In Malaysia, all 1,584 WR are democratically elected by their peers of the same nationality and WRs are empowered to communicate and convey challenges faced by workers, and to suggest improvements during the sessions. Each OU holds social dialogue sessions at least once a month.

The matters raised during social dialogue sessions are closely monitored to ensure that timely action is taken to resolve any issues. Additionally, the information and data gathered from social dialogues are used to identify any potential systemic issues, which are then rectified organisation-wide, if necessary. For the year under review, a total of 3,450 issues have been raised through our social dialogues marking a 60% reduction from issues raised in 2023. Of these, 93% have been resolved and the remaining issues relating to building or infrastructure are in various stages of being addressed.

The Social Dialogue Platform has also been fully rolled out and replicated in our Indonesian operations. In 2024, 96% of Minamas operations had carried out Social Dialogue meetings at their operating units, with 94% of the issues raised, addressed and resolved. The progress of the Social Dialogue Platform will continually be assessed and monitored to ensure the effectiveness.

Responsible Recruitment of Migrant Workers

Since 2022, our Migrant Worker Responsible Recruitment Procedure (RRP) has been instrumental in promoting fair and ethical labour practices, ensuring that recruitment processes uphold workers' rights and provide equitable opportunities. Through the RRP, SD Guthrie ensures that workers' recruitment experience is fair and transparent, particularly in the hiring of migrant workers for our Malaysian operations.

SD Guthrie's direct hiring ensures workers are employed through an informed consent process, whereby no worker should pay recruitment fees, and all wages and benefits, including housing and other amenities, are accurately described. At the point of recruitment, we inform workers how their wages are paid and clearly explain all their entitlements, including the right to return to their home countries at the company's expense. Workers' employment contracts are issued to them in their countries of origin and are prepared in their national languages. The terms and conditions of the contracts are further explained verbally in their native languages prior to signing the document. This ensures workers are informed about the job we are offering, before giving their consent to accept the job offer.

We conduct due diligence on recruitment agents before selecting qualified ones through an open tender process. After appointment, agents receive training on ILO standards, responsible recruitment practices, SD Guthrie's grievance management, and our RRP. Through enhanced direct hire practices, we transfer knowledge to agents to support recruitment efforts. Workers are informed about our zero-recruitment fee policy with clear explanations at each step of the recruitment process. They also have access to the Suara Kami pre-departure helpline for queries. We closely monitor the process to ensure no fees are charged and personal documents are not withheld.

For the period under review, we have also appointed third party organisations to undertake pre-departure and post arrival assessments of our workers as an added monitoring measure.

TRAINING AND AWARENESS

Training programmes on labour and human rights have been incorporated as an important element in SD Guthrie's operations, where dedicated sessions are allocated in the OUs' yearly calendar of activities. These include targeted trainings for workers, mandors/supervisors, administration staff, members of Management, regional level executives, as well as external stakeholders such as contractors and vendors. These sessions are conducted both online and in-person. The training topics cover a broad spectrum, including general awareness of human rights, women's and children's rights, labour laws, as well as the rights and responsibilities of workers. Our new employees also undergo onboarding programmes to ensure that they are aware of their rights and responsibilities.

In Malaysia, to support the assimilation of new migrant workers into their workplace, a dedicated programme is conducted to cover essential topics. These include an introduction to the country and its cultural norms, the rights and responsibilities of workers, key policies, workplace safety, medical access, terms and conditions of employment, working hours, wages, benefits, and entitlements, as well as available grievance mechanisms. For the year under review, more than 1,500 newly arrived migrant workers in Malaysia, participated in this programme.

We will continue to carry out similar training exercises across all our operations through both physical and virtual platforms in 2025.

BOARD APPROVAL

The Board of Directors of SD Guthrie Berhad and SD Guthrie International Liverpool Refinery Ltd have endorsed this statement of commitment at their respective board meetings.



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Group Managing Director
On behalf of SD Guthrie Berhad



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Chief Executive Officer, SD Guthrie International
On behalf of SD Guthrie International
Liverpool Refinery Ltd