SIPEF recognises that human resource management is a process requiring constant focus and alignment. A comprehensive set of departments and Human Resources are relied on to ensure compliance with all relevant legal and certification standards. Furthermore, SIPEF has developed a training program that highlights its procedural compliance with labour standards as per its commitments, including the RSPO requirements. The Company has been conducting independent audits as well as trainings throughout the organisation, in order to progress on a consistent implementation of its policies. Following this an independent review is done each year to make sure there are efforts being made for continuous progress and to review implementation processes. SIPEF has engaged an expert NGO to provide an impartial analysis of the grievances raised, assess SIPEF's policy implementation and check the efficacy of SIPEF's internal audit framework. The expert team is regularly visiting the site and has access to all stakeholders and information required.

- November 2017: Initial communication received from Sawit Watch.
- December 2017: Internal verification of the grievances, identification of root causes for the issues on work safety and implementation of corrective actions (availability of PPE, training programs for permanent and free labour, stricter supervision of contractors).
- February 2018: Sawit Watch enter the company grievance procedure.
- March 2018: meeting with Sawit Watch, acknowledgement of issues, development of action plans, including 1/ mediation of individual land rights case, 2/ meeting with free labour union representatives to be facilitated by Sawit Watch, 3/ continued improvements to work safety in PT AKL.
- March 2018: meeting with 11.11.11 to review progress of action plan.
- April 2018: meeting with free labour union facilitated by Sawit Watch; reiterated company policy on freedom of
  association, agreed to further cooperation between the union and the company, in particular around work safety for
  free labour.
- July 2018: scheduled annual medical check of high-risk workers (which includes those working with pesticides), including free labour.
- November 2018: review of progress with Sawit Watch; work safety satisfactory, engagement with the aggrieved landowner still in progress, free labour union situation improved but requiring further efforts to bring company contractors to full compliance. Regarding the union, reports of intimidation have been communicated to the company and are being investigated.
- April 19, 2019: physical meeting with Sawit Watch and a representative of 11.11.11. All the questions regarding
  labour conditions and contractors in general were answered with documentation to explain the labor conditions and
  status (hiring criteria, minimum wages, contractors...).
- August 13, 2019: Physical meeting with Sawit Watch, Free labor representative, and complainant of land acquisition.
   Discussion about Sipef's policy on freedom of association. All labours are free to organize themselves in union to bargain and discuss with their employer (the contractors in case of free labour). Ref (19.08.13-AKL)
- November 3, 2019: Email communication received from Sawit Watch informing SIPEF that an ongoing investigation
  of labour practices at Pt AKL is planning to be published and giving SIPEF an chance to comment on the draft of the
  study. Ref (19.10.03.1-AKL)
- November 3 & 5, 2019: Meeting with Sawit Watch during RT. Agreement on continued cooperation regarding labour issues ongoing at Pt AKL. Ref (19.10.03.2-AKL)
- November 25, 2019: A considered and documented response stating our position on the allegations was sent to Sawit Watch on November 25, 2019 regarding the various allegations made in the article they had given us a chance to comment on November 3rd and discussed at the RT meetings November 3-5. Ref (19.11.25-AKL)
- December 7, 2019- January 10, 2020: Several more allegations from Sawit Watch were received questioning the veracity of SIPEF's response to the original (November 3rd) call for comments on an upcoming article. SIPEF's responded to this on December 19. A final response from Sawit Watch refuting our claims was received on January 10, 2020. Ref(19.12.07-AKL)
- February 24, 2020: Transnational Palm Oil Labour Solidarity (TPOLS) sent in a protest letter reiterating the accusations previously raised by Sawit Watch. Ref (20.02.24-AKL)
- March 11, 2020: A documented response stating our position on their allegations was provided to TPOLS on March 11, 2020. Ref (20.03.11-AKL)
- April 7, 2020: TPOLS sent their response to SIPEF refuting the explanations provided by SIPEF. Ref (20.04.07-AKL)
- April 30, 2020: SIPEF responded to TPOLS with further explanations, action plan and engagement strategy to address the concerns raised. Ref(20.04.30-AKL)
- June 8, 2020: TPOLS sent their response to SIPEF refuting the explanation provided by SIPEF. Ref (20.06.08)
- June 17, 2020: SIPEF sent their response to TPOLS providing further explanations regarding their allegation. Ref (20.06.17-AKL)
- July 30, 2020: SIPEF received a notice from TPOLS of an online petition regarding the allegations at AKL. SIPEF
  management has decided to not respond further to the allegations but focus on implementing its process already
  outlined to TPOLS regarding this Ref(20.07.30-AKL).