



## Summary - ADM Grievance Log

The document is divided in three sections:

1. 'Summary - ADM Grievance Log' summarizes the accumulated number of grievances linked to ADM's supply chain by key dimensions

2. 'Grievance Log' lists received grievances linked to ADM's supply chain, and their the investigation status and actions taken by ADM

3. 'Appendix' lists ineligible grievances (grievances not linked to ADM Supply Chain)

### Grievance Statistics

Accumulated number of grievances linked to ADM's supply chain

| Supply Chain | Commodity | Country   | Issue                      | Status              |
|--------------|-----------|-----------|----------------------------|---------------------|
| Direct       | Palm Oil  | Indonesia | Deforestation & Conversion | Closed              |
| 16           | 95%       | 72%       | 79%                        | 65%                 |
| Indirect     | Soybean   | Malaysia  | Land Dispute               | Suspended           |
| 275          | 3%        | 19%       | 9%                         | 15%                 |
|              | Other     | Brazil    | Working Conditions         | Monitoring          |
|              | 2%        | 3%        | 3%                         | 15%                 |
|              |           | Other     | Other                      | Under Investigation |
|              |           | 6%        | 9%                         | 4%                  |



## Grievance Log

List of received grievances linked to ADM's supply chain, and their the investigation status and actions taken by ADM.

| ID  | Reported Group  | Supply Chain (Commodity-Country-Relationship) | Grievance Category                         | Description of the Grievance  | Reported By  | Reporting Source           | Investigation Updates & Actions Taken by ADM   | Status        | Last Update |
|-----|---|---|--|---|--|----------------------------|--|---------------|-------------|
| 321 | Gunas Group   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegations in respect of human rights in the following concessions:<br>- PT Sumatra Jaya Agro Lestari (PT SJAL)              | West Kalimantan Palm Oil Plantation Workers Unions Federation (WIPF) |                            | 03-Mar-2026: ADM does not maintain a direct commercial relationship with PT SJAL or the Gunas Group; our connection is indirect and occurs through third-party suppliers. Based on currently available information provided by our third party consultant, the reported case concerning PT SJAL appears to be consistent and relates to a job transfer (mutation) involving union officials carried out by the company. ADM is monitoring the situation and will provide and update as further information becomes available.  | 2. Monitoring | 3-Mar-26    |
| 322 | TSH Resources Berhad (THS Group)                            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Teguh Swakarsa Sejahtera           | Mighty Earth   | Rapid Response Report 55   | 02-Mar-2026: Our direct supplier is currently in communication with the company to seek clarification. Any updates from this engagement will be reflected in our grievance log.  | 2. Monitoring | 2-Mar-26    |
| 323 | Panca Eka Group   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Uniseraya                          | Mighty Earth   | Rapid Response Report 55   | 02-Mar-2026: Based on ADM's third-party review, the alert occurred between 1–17 November 2025 (approximately 0.8 ha), with no further expansion observed up to February 2026. The detected activity appears to be a road located at the edge of an existing plantation block, seemingly functioning as an additional access road. ADM will continue to monitor both cases and update records as new information becomes available.   | 2. Monitoring | 2-Mar-26    |
| 164 | FGV Holdings Berhad and its subsidiaries and joint ventures | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Reports of deforestation and human rights violations  | U.S. Customs and Border Protection                                   |                            | 29-Jan-2026: ADM acknowledges and appreciates the actions taken by FGV in response to the issues raised by the U.S. Customs and Border Protection (CBP). The steps implemented demonstrate progress and reflect an important learning process for both FGV and the broader industry. These actions underscore the continued importance of upholding fundamental and normative labor rights through a human rights-based approach across operations and supply chains. Based on the progress observed, ADM considers the human rights grievance reported under the U.S. CBP to be closed, with ongoing engagement and monitoring to continue as part of our standard due diligence process.<br>22-Jan-2026: FGV is still awaiting a response from U.S. Customs and Border Protection (CBP) regarding its resubmitted petition on 15 February 2025 to modify the Withhold Release Order (WRO) issued in September 2020. This followed an initial petition submitted in June 2024. No updates have been reported to date. RSPO requires FGV to report its remediation progress directly to CBP. Status of the grievance remains as 'Monitoring' driven by the unresolved WRO process.<br>31-May-2023: ADM engaged its direct suppliers and FGV to investigate the case. FGV reaffirmed its commitment to human rights and labor standards, publishing an action plan in March 2020 aligned with the Fair Labor Association's (FLA) Principles of Fair Labor and Responsible Sourcing. Following the U.S. Customs and Border Protection's Withhold Release Order (WRO) on FGV's palm oil products, the company revised its sustainability policy, enhanced its grievance and labor monitoring systems, and implemented measures to strengthen migrant worker recruitment and training. In November 2021, FGV appointed ELEVATE to support independent verification. By February 2023, FGV had completed on-site assessments and was implementing recommendations ahead of submitting its final report to CBP. ADM's direct supplier continues to monitor FGV's progress. | 4. Closed     | 29-Jan-26   |
| 236 | Rimbunan Hijau  | PalmOil - Malaysia - Indirect                 | Environment and/or Human Rights - Multiple | Reports of various NDPE violations including environmental degradation, deforestation, and human rights and health and safety | Global Witness   | The True Price of Palm Oil | 22-Jan-2026: While investigations pursued by NDPE traders point that reported land clearing was not linked to palm development, our external consultant noted some potential land-use change liabilities in 2024–2025 that merit attention. Although these do not indicate NDPE non-compliance, continued monitoring is recommended to ensure ongoing alignment with NDPE commitments.<br>29-Mar-2026: Based on a statement from one of NDPE traders, it has been verified that the land clearing is not related to oil palm development.  | 2. Monitoring | 22-Jan-26   |
| 231 | PT Tasma Puja   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of NDPE violations in the following concessions:<br>- Batang Cenaku   | Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara            |                            | 22-Jan-2026: According to an external consultant, while the company has obtained mandatory permits (ILOK 2006, IUP 2007, and IUP extension 2013), monitoring is still needed to track corrective actions and community engagement outcomes. For more info: <a href="https://sdpanel.goldenagri.com.sg/storage/file/hdw8Euploaddgarexecutivesummarytasmajaverificationnov2021_slhs.pdf">https://sdpanel.goldenagri.com.sg/storage/file/hdw8Euploaddgarexecutivesummarytasmajaverificationnov2021_slhs.pdf</a><br>29-Mar-2023: ADM engaged its direct supplier to investigate the allegations involving PT Tasma Puja (PT TP). The supplier confirmed that PT TP had obtained all required permits prior to the area's forest designation and has since submitted a proposal for a forest release permit to address the overlap issue. PT TP also stated that it conducts due diligence on all new FFB suppliers to ensure sourcing does not occur from protected forests, while further evidence is being reviewed. Additionally, a land dispute with local communities has been resolved through an agreement to allocate 378 hectares as plasma land with a 17.5% profit-sharing arrangement, supported by local authorities. A verification visit to PT TP's Batang Cenaku mill was completed, and progress updates are being monitored.   | 2. Monitoring | 22-Jan-26   |

| ID  | Reported Group  | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance   | Reported By                     | Reporting Source         | Investigation Updates & Actions Taken by ADM   | Status        | Last Update |
|-----|---|---|--|--|---------------------------------|--------------------------|--|---------------|-------------|
| 213 | Yayasan Pelajaran Johor (Johor State Government)          | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- YPJ Plantations Sdn Bhd (Ladang) | Mighty Earth                    | Rapid Response Report 32 | 22-Jan-2026: Given the presence of historical land-clearing liabilities without evidence of new clearance, and the absence of formal NDPE commitments, SWOs, or recovery plans from YPJ Holdings, ADM has changed the status of the grievance to "Monitoring".<br>26-May-2022: ADM reached out to direct supplier for investigation. Our direct supplier informed us that they are working YPJ Plantations to identify any potential NDPE violations in the concession in question. YPJ Plantation is committed to adhere to the NDPE criteria as described in their Sustainability Policy (2021). Additionally, our direct supplier confirmed that their satellite monitoring partner has verified that there was no forest loss/ peat land conversion in 2021. ADM considers this case closed.   | 2. Monitoring | 22-Jan-26   |
| 195 | Julong  | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute              | Rezeki Kencana - Land dispute, waste dumping   | Global Witness                  |                          | 22-Jan-2026: Our external consultant indicated constructive dialogue with Julong regarding updates on the ongoing sustainability assessment. While partial confirmation has been provided and engagement has been constructive, follow-up information is requested to indicate that the process is completed.<br>8-May-2023: ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2017. Based on the assessment, an action plan and a number of development programs were developed. Overall, based on the visit, our direct supplier said that waste is fairly well managed. However, some follow up actions were agreed upon: a) Appoint and assign a person in charge to carry out environmental management and monitoring at the unit level; b) File records in LB3 warehouse; c) Strengthen efforts to manage empty bunches and solid citation. Our direct supplier continues to engage PT RK and monitor the progress.  | 2. Monitoring | 22-Jan-26   |
| 162 | Yayasan Pahang  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- YP Plantation Sdn Bhd            | Mighty Earth                    | Rapid Response Report 30 | 22-Jan-2026: Despite indications of absence of new clearance and the issuance of an SWO, NDPE Commitment, and Recovery Plan, the grievance status remains "Monitoring", as recovery actions still need to be tracked to ensure sustained compliance.<br>29-Jan-2021: ADM reached out to its direct supplier for investigation. Our direct supplier informed us that that YPP conducted and an environmental impact assessment prior to land development, as well as having received approval from local authorities, the department of environment, and abiding by state regulations before developing the area in question. YPP has also adopted an NDPE policy and imposed a moratorium on land clearing. <a href="https://ypph.com.my/v4/polisi-mspo/#1599635710116-a294b1da-05dd">https://ypph.com.my/v4/polisi-mspo/#1599635710116-a294b1da-05dd</a>  | 2. Monitoring | 22-Jan-26   |
| 87  | Nurdin Tampubolon Corporation (NT Corp)                   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Bintang Sakti Lengana                                     | Mighty Earth                    | Rapid Response Report 19 | 22-Jan-2026: The status remains "Monitoring", as it is still necessary to track developments and assess the company's future responses. The corrective actions have not yet been reported as fully implemented.<br>29-Nov-2022: ADM reached out to direct supplier for investigation. Our direct supplier informed us that HCS/HCV assesments will be used using HCSA/ALS registered assessors followed by a peer review. Furthermore, a commitment to no development on HCS/HCV/peat is in place on a group-level. Direct supplier is monitoring any further land clearance and there are no clearings in 2021 so far.<br>Jun-22: No purchase data reflected as of H2 2021 traceability report.   | 2. Monitoring | 22-Jan-26   |
| 276 | Runding Putra Persada                                     | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Mahmudin plantation  | RAN - Rainforest Action Network |                          | 22-Jan-2026: Our external consultant's data indicates that the case is associated with the Mr. Santo Sumono Group, rather than PT Runding Putra Persada (PT RPP) as the primary entity. No deforestation liabilities were identified for the 2016–2025 period. The issue originated from indirect exposure through FFB sourcing from a smallholder operating within the Rawa Singkil Wildlife Reserve, supplied via CV Buana Indah to PT RPP. PT RPP has committed to ceasing sourcing from the implicated smallholder, achieving 100% Traceability to Plantation by September 2023, and strengthening its traceability systems. Multiple buyers conducted joint verifications and monitoring activities between 2023 and 2024, confirming that corrective actions were completed. A joint statement issued in December 2023 declared the case resolved. Follow-up monitoring in October 2024 reaffirmed continued compliance, with no new non-compliance identified.<br>30-Aug-2023: ADM engaged its direct supplier to investigate the case, confirming that PT RPP achieved 100% Traceability to Plantation (TtP) and conducted multiple field verifications between 2022 and 2023. The investigations found no clear evidence linking non-compliant smallholder land to PT RPP's supply chain. PT RPP implemented an action plan, trained staff on traceability, and committed to full TtP by September 2023. One smallholder refused to release 4 hectares within the Rawa Singkil Wildlife Reserve, PT RPP and CV Buana Indah excluded him from their supply chain and classified him as a high-risk supplier. | 4. Closed     | 22-Jan-26   |
| 320 | ADM   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Allegation of deforestation in the PT Loka Indah Lestari concession  | Mighty Earth                    | Rapid Response Report 54 | 13-Jan-2026: Our findings indicate that PT Loka Indah Lestari has been subject to significant regulatory pressure from the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency to open and optimize planted areas within its HGU, including the potential risk of permit revocation due to land abandonment. Concurrently, Kencana Agri has been required by the Ministry of Forestry and the Ministry of Environment to safeguard designated High Conservation Value Forest (HCVF) areas. We are actively engaging with our direct suppliers to evaluate and implement appropriate actions.  | 2. Monitoring | 13-Jan-26   |
| 297 | PT Permata Putera Mandiri (Austindo Nusantara Jaya Group) | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Land clearing  | Upfield                         |                          | 08-Jan-2026: Grievance relates to historical land clearing linked to PT Permata Putera Mandiri, formerly part of Austindo Nusantara Jaya Group, and currently associated with Zarvex Global Limited. Our verification confirms historical deforestation liability for the 2016–2023 period, with no additional liability identified for 2024–2025 based on the information available at this time of review.<br>ANJ Group has publicly disclosed its NDPE Policy, Stop Work Order (SWO), and Recovery Plan, and has demonstrated progress in recovery implementation. The recovery efforts have been acknowledged by multiple downstream buyers, including the lifting of suspensions and case closures by several companies, while others continue monitoring without identifying new deforestation.<br>11-Oct-2024: PT Permata Putera Mandiri (Austindo Nusantara Jaya Group) (Metamani Estate in Stirling data) has consistently provided annual progress updates on their recovery efforts since 2020 until 2023.  | 4. Closed     | 8-Jan-26    |

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|-----|--|---|--|---|---|--|--|------------------------|-------------|
| 319 | Brazil - Three properties listed in the tracker report | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion   | Reports of deforestation linked to soybean production in Brazil   | Mighty Earth  | Right of Reply - Rapid Response Deforestation Monitoring Program | 13-Nov-2025: ADM has received additional information related to the case, which is currently under review by the sustainability team. As a result, the status of this grievance has been updated to "Under Investigation".<br>06-Oct-2025: ADM received an email inquiry regarding three properties in Brazil that are suspected of being involved in deforestation for soybean production. Based on the information provided in cases 1 and 3, geospatial analysis of the indicated areas (SNCI: 9500257101563, 9014311006928, 9014310159895, and 9999623580024) reveals that deforestation occurred in the area. However, there was no conversion to agriculture, and the area is currently not being used for grain cultivation. Furthermore, no grain purchase transactions have been conducted from the indicated origination area or with the property owners of the area. For case 2, historical satellite imagery (Sentinel and Landsat) of the indicated and monitored area (SNCI: 6310190087299) shows no evidence of deforestation or land conversion after 2020. The area remains covered with native vegetation, and there are no indications of grain planting for the 2025 harvest.   | 1. Under Investigation | 13-Nov-25   |
| 302 | Rimbunan Hijau Group                                   | PalmOil - Papua New Guinea - Indirect         | Environment - Deforestation & Conversion   | Land clearing   | Mighty Earth  | Rapid Response Report 46   | 12-Nov-2025: The case was verified. ADM's direct supplier clarified that all related cleared areas are located outside the boundaries of the plantation and this case was closed.<br>22-Oct-2024: Our consultant responsible for investigating deforestation has identified that the area consists of mixed plantations, with some clearing originating from outside the concession boundaries. To ensure clarity and accuracy regarding the type of area that was cleared, ADM will conduct an on-site verification with its dedicated verification consultant.   | 4. Closed              | 12-Nov-25   |
| 93  | Triputra Agro Persada                                  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Berau Karetindo Lestari (area 2)                   | Mighty Earth  | Rapid Response Report 2, 16, 19, 20, 21                          | 12-Nov-2025: ADM's direct supplier is no longer connected to Berau Karetindo. Furthermore, ADM's consultant has thoroughly investigated recent deforestation alerts and confirmed that the activities are occurring outside concession areas and are being carried out by local communities.<br>12-Aug-2025: The case is still under active investigation, and ADM has been diligently monitoring the direct supplier.<br>13-Nov-2024: PT Berau Karetindo Lestari has no listed grievances on buyer trackers. While TAP committed to NDPE in July 2022, EQ/ID found an outstanding NDPE liability of 5,425 hectares from 2016–2023. TAP appears on the RACP tracker, but no information is available regarding corrective actions or re-entry and recovery programs.<br>30-Nov-2019: ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.  | 4. Closed              | 12-Nov-25   |
| 309 | Grupo Oleoflores S.A.S.                                | PalmOil - Columbia - Indirect                 | Environment and/or Human Rights - Multiple | Allegations with respect to human rights  | Forest Peoples Programme                                  |  | 07-Nov-2025: Independent auditor with no conflict of interest has been mandated for RSPO investigation. Investigation's conclusion did not indicate any significant progress yet.<br>28-Nov-2024: Involved stakeholders submitted a complaint to RSPO. Case in under investigation.  | 1. Under Investigation | 7-Nov-25    |
| 232 | First Resources  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of NDPE violations in the following concessions:<br>- Cilandra Perkasa                                    | Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara |  | 28-Oct-2025: Additional connections from First Resources to mills were discovered. We have confirmed that our direct suppliers have added First Borneo to their own suspension lists and have engaged their Tier 2 suppliers to cascade the same requirement. Furthermore, one of our direct suppliers confirmed that they will continue monitoring the situation closely through ongoing engagement with relevant stakeholders, a warning letter was issued to mills located within the First Borneo sourcing radius, instructing them not to procure from First Borneo. They also plan to expand the monitoring radius to identify any further potential supply chain links and will reissue an updated warning letter to their partner mills accordingly.<br>12-Aug-2025: The case is still under active investigation, and ADM has been diligently monitoring the direct supplier. ADM reached out to its direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation: a. Suspected of developing plantation in forest production area (HP) and convertible production forest (HPK) in Kampar Regency, Riau. b. Suspected of planting, harvesting, processing, selling, and marketing oil palm products illegally developed within a forest area. Regarding the allegation of developing on land that is within HPT and HPK area / forest area: Our direct supplier has engaged PT CP regarding the overlap of PT CP concession with a designated forest area. This overlap land matters in Indonesia involves the wider palm oil industry in Indonesia. In conducting its operations, PT. Cilandra Perkasa has obtained relevant and appropriate obligations from the government such as Izin Lokasi, Izin Usaha Perkebunan (IUP) and/or Hak Guna Usaha (HGU). To address these legacy issues, the government has updated the Omnibus Law to include Article 110A paragraph (1): "Everyone carrying out a business that has been established and having a Business Permit in a forest estate before Job Creation Law is in effect who has not fulfilled the requirements in accordance with the regulations of law in the forestry sector, must fulfil such requirements no later than three (3) years upon the effectiveness of the Job Creation Law.". Fuji is closely monitoring the case and engaging our direct suppliers for updates. We will keep our stakeholders informed on this case. | 2. Monitoring          | 28-Oct-25   |
| 235 | Yayasan Sabah  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- Innoprise Plantations Bhd | Mighty Earth  | Rapid Response Report 36   | 08-Oct-2025: ADM has reopened the grievance status for further review. Additional documentation has been requested to Innoprise Palm Oil, ADM's external consultant is waiting for Innoprise Palm Oil reply.<br>28-Oct-2021: ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they were investigating the case prior to the publication of Rapid Response Report 36, and the outcome of the investigation found that the land development was not related to oil palm operation, but rather tree planting activities (Neolamarckia cadamba). Concession maps, and annual work plans approved by Sabah Forestry Department (SFD), and field visit reports were provided.  | 1. Under Investigation | 8-Oct-25    |

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|-----|-----------------|---|--|--|---|--|--|------------------------|-------------|
| 310 | DINANT          | PalmOil - Honduras - Indirect                 | Environment and/or Human Rights - Multiple | Allegations of violence and discrimination against local communities   | Christliche Initiative Romero e.V.                  | Palm Oil Report 2024 – In the shadow of the oil palm | 08-Oct-2025: An investigation has been initiated by RSPO. ADM adopts a no-buy position during RSPO's investigation period.<br>31-Jan-2025: ADM contacted its direct supplier who reaffirmed Dinant's commitment to sustainability and Human-Rights. ADM's direct supplier claims that it is not connected to Dinant's supply chain since January 2024. Dinant published the following public statement: <a href="https://www.dinant.com/noticias/dinant-categorically-rejects-the-unfounded-allegations-made-in-the-cir-report-in-the-shade-of-the-oil-palm-oil-palm-report-2024/?lang=en">https://www.dinant.com/noticias/dinant-categorically-rejects-the-unfounded-allegations-made-in-the-cir-report-in-the-shade-of-the-oil-palm-oil-palm-report-2024/?lang=en</a>  | 3. Suspended           | 8-Oct-25    |
| 279 | Mr Ricky Tan    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>-PT Sinar Bellilas Perkasa   | Mighty Earth  | Rapid Response 42                                    | 08-Oct-2025: Group ownership changed from Mentari Group to Mr Ricky Tan. The subsidiary changed from PT Alamsari Lestari to PT Sinar Bellilas Perkasa.<br>29-Dec-2023: ADM reached out to its supplier for additional information. ADM identified that PT Risman Scham Palm Indonesia is potentially linked through an indirect supplier. Reported concession was suspended.<br>15-Jun-2022: Mentari Group confirmed that PT. Alamsari Lestari's concession was acquired in 2019. Mentari Group explained that the land clearing was a recovery/replanting of unproductive areas previously cleared and planted by the previous owner but poorly managed. PT ASL gave several statements on the progress that has been made regarding to the case, such as conducted a moratorium, commitment to NDPE, HCV/HCSA and soli survey. ADM has reached out to direct supplier to request evidence on the implementation of such claims, to keep monitoring for evidence of solved land conflicts with local communities and to suspend sourcing from PT Risman Scham Palm.<br>6-Apr-2022:PHG engaged with Mentari Group, seeking clarification.<br>5-Apr-2022:Permata Hijau Group grievance website received information that PT. Alamsari Lestari, owned by Mentari Group, was allegedly involved in clearing 6 hectares of peat forest and developing 45 hectares of peatland in January and February 2022.  | 3. Suspended           | 8-Oct-25    |
| 318 | ADM             | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation in PT Graha Agro Nusantara (KPN Group)   | Mighty Earth  | Rapid Response Report 50                             | 23-Sep-2025: Supplier provided clarification regarding the detected land-clearing activity. It was explained that, prior to the publication of MERR 50, the activity had been identified during their annual monitoring in May 2024. The following actions were taken in response:<br>- Uprooting palm plantations<br>- Restoring damaged areas and replanting with natural seedlings<br>- Updating and creating new oversight procedures, including land cover change monitoring<br>- Re-socializing procedures to unit management<br>- Monitoring land cover changes regularly   | 2. Monitoring          | 23-Sep-25   |
| 131 | Bumitama Group  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Damai Agro Sejahtera  | Mighty Earth  | Rapid Response Report 22, 23, 26, 27, 50             | 23-Sep-2025: The company has issued an official statement regarding the report (Aug 2025 and Sept 2025). Grievance status was updated to Monitoring. ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT DAS patrol's recorded illegal logging activity in the area prior to the incident. The illegal activity has been reported to the police. In addition, the area was also impacted by forest fires in the dry season of 2019. Bumitama has an NDPE and is an RSPO member. The official response can be found here: <a href="http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7dce985a">http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7dce985a</a><br>PT DAS has conducted a land-use change analysis after allegations, but no land clearing was discovered. Our supplier also verified that there has been no recent deforestation in PT DAS: <a href="https://bit.ly/3cVs01U">https://bit.ly/3cVs01U</a>  | 2. Monitoring          | 23-Sep-25   |
| 218 | First Resources | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | The company allegedly has ownership over Fangiono Agro Plantation (FAP) Agri and Clandry Anky Abadi (CAA) neither of which were disclosed as being part of the | Aid Environment, Environmental Investigation Agency |  | 22-Sep-2025: ADM engaged with its direct supplier and grievance investigation service to review corporate structures, shareholder data, and notarial deeds. The findings indicated that the four entities in question operate as separate groups, primarily due to the absence of overlapping majority shareholders—a key metric ADM uses to define corporate control. While clear ownership connections through family relations and documented past business ties were identified, these links do not meet the threshold for mandatory group classification, as they do not constitute direct operational or financial control.<br><br>ADM has reached out to its direct supplier(s) for further investigation and is actively following the case through the RSPO Complaints Panel (CP). The case is currently under review by the RSPO CP. ADM acknowledges and adheres to the RSPO's Complaints System and is closely monitoring the case progress via the RSPO case tracker ( <a href="https://askrspo.force.com/Complaint/s/case/5000e00003CLXepAAH/detail">https://askrspo.force.com/Complaint/s/case/5000e00003CLXepAAH/detail</a> ). The case is currently pending consideration by the CP on the method of investigation.   | 2. Monitoring          | 22-Sep-25   |
| 317 | ADM Joaçaba     | Soybean - Brazil - Indirect                   | Environment - Deforestation & Conversion   | Sourcing grains indirectly grown illegally on Indigenous territory in South of Brazil  | ADM self-declaration                                | IBAMA's notification                                 | 16-Sep-25: On August 4th, 2025, ADM has completed the full return of the product under investigation. The supplier has retrieved the entire volume of soybeans delivered to the Joaçaba/SC plant. Additionally, a formal declaration confirming the return of the volume under investigation, as required by IBAMA, has been issued to the supplier.<br>30-Jun-25: ADM contacted the supplier to request further clarification regarding the alleged sourcing of soybeans from an embargoed indigenous area. All payments to the supplier were suspended pending resolution.<br>12-Jun-25: ADM responded to IBAMA, clarifying that it had no direct relationship with the producers allegedly involved in cultivating the soybeans in question. ADM also provided maps of the farms referenced in the invoices, demonstrating compliance with local legislation and ADM's Policy. ADM reaffirmed its commitment to sourcing soybeans only from producers in good standing with environmental regulations.<br>28-May-25: ADM received a notification from IBAMA representatives at the Joaçaba facility requesting clarification regarding soybeans purchased from an indirect supplier. The supplier allegedly sourced soybeans cultivated in an indigenous territory under embargo. ADM immediately reviewed the relevant documentation (invoices and the MRV system) and confirmed that the volumes reported were in compliance with ADM's Policy. | 1. Under Investigation | 16-Sep-25   |

| ID  | Reported Group         | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance   | Reported By              | Reporting Source                 | Investigation Updates & Actions Taken by ADM  | Status                 | Last Update |
|-----|------------------------|---|--|--|--------------------------|----------------------------------|---|------------------------|-------------|
| 102 | Kwantas Corporation    | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Miracle Harvest Sdn Bhd                                    | Mighty Earth             | Rapid Response Report 20, 21, 29 | <p>12-Aug-2025: The case is still under active investigation, and ADM has been diligently monitoring the direct supplier.</p> <p>13-Nov-2024: Kwantas Corporation Group, through Miracle Harvest, has committed to NDPE since 2018. However, we cannot access their website for updates on corrective actions. Few buyers provide information on this case, and there is no available data regarding Kwantas Corporation's recovery or NDPE re-entry actions.</p> <p>30-Nov-2019: ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.</p>  | 1. Under Investigation | 12-Aug-25   |
| 278 | AAK/AarhusKarlshamn AB | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>-Tesso Nilo Mills                | Upfield / Sveriges Natur |                                  | <p>12-Aug-2025: The case is still under active investigation, and ADM has been diligently monitoring the direct supplier.</p> <p>Oct-2024: We are collaborating with our Tier 1 suppliers to develop action plans addressing the report's outcomes. ADM reached out to its supplier for investigation. Our direct supplier provided information on the allegations first raised in 2018. Sveriges Natur's reported a list of 20 mills that extract oil from illegally-grown palm fruit inside Tesso Nilo, which is then shipped to customers worldwide. According to the report each mill supplies palm oil to a slew of international businesses, including AAK. Our direct supplier has confirmed that they don't source directly from Tesso Nilo landscape.</p> <p>In 2018, all mills committed to either blacklisting or strengthening monitoring against trucks and dealers in the report. In line with our expectations of engaging in high priority landscapes, we advocate for our direct suppliers to collect traceability to plantation data in these areas. They have commitments and SOPs against sourcing from illegal concessions in the landscape and will socialize them again with suppliers.</p> <p>In line with our expectations of engaging in high priority landscapes, we advocate for our direct suppliers to collect traceability to plantation data in these areas. (July 2018)</p> <p>Our trading partners confirmed they do not source from the Tesso Nilo park and the surrounding National parks. Supplying mills to our trading partners (mills mentioned in the EOF report) have been visited by our trading partners and are undergoing the ART transformation program as well as a traceability to plantation program.</p> <p>Our direct supplier initiated dialogues with suppliers after receiving the report, clarifying that they do not directly purchase Fresh Fruit Bunches (FFB) from the mentioned area. They expect their crude palm oil suppliers to comply with their Sustainability Policy. Field audits will be conducted, and a corrective action plan will be developed based on the findings. Our direct supplier attended multi-stakeholder meetings to discuss the establishment of a task force to address illegal farming in the park.</p>  | 1. Under Investigation | 6-Aug-25    |
| 152 | Astra Agro Lestari     | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute              | Reports of land disputes and resistance by local citizens in the following concessions:<br>- PT Mamuang (Passang Kayu) | Walhi                    |                                  | <p>05-Jun-2025: ADM is actively engaged in addressing the situation by maintaining direct communication with its direct supplier to gather the latest updates and monitor ongoing corrective actions. The direct supplier is working with Astra Agro Lestari (PT AAL) and key stakeholders to resolve the matter effectively. As part of this process, ADM has received a detailed 3-year timebound action plan prepared by PT AAL and is monitoring its implementation to track progress and outcomes.</p> <p>10-Jul-2024: Three companies - namely, PT Lestari Tani Teladan, PT Mamuang, and PT Agro Nusa Abadi - operate in South Sulawesi, West Sulawesi, and Central Sulawesi as subsidiaries of ADM's direct supplier. Several critical issues have been identified, including overlapping claims with local communities, allegations of land grabbing, criminalization, concerns regarding plasma partnerships, activities conducted beyond the boundaries of the Cultivation Right (HGU), and operations being conducted without the necessary HGU permits. Our direct supplier has engaged with Astra Agro Lestari on all listed cases and provided us with an update of occurrences. Please see the summary below.</p> <p>- PT Mamuang - holds a positive relationship with the local community. They are the legal owners of the land which is shown by the operating permits they hold for the land. Nevertheless, they still engaged and negotiated with the complainants through a mediation process with local authorities. An agreement was not reached and a member of the complainant party engaged in activities that resulted in conviction of criminal charges. This decision was made by legal authorities and courts.</p> <p>- PT LTT - additional information has been requested by PT LTT in order to investigate the unverified alleged land grab. It was clarified by PT LTT that there are no outsourcing activities for its operations. Pricing runs in accordance with the regulation set by the Minister of Agriculture of the Republic of Indonesia.</p> <p>- PT ANA - all relevant permits are in place and laws complied with. Community rights are always respected, and land tenure is obtained through processes that include the community and agreement is reached.</p> <p>Our direct supplier has explained that they continue to invest resources to try and engage with WALHI/FEO in hope of being able to verify allegations and support efforts to identify, develop, and implement resolutions that are accepted by all parties, but so far without success.</p> | 2. Monitoring          | 5-Jun-25    |

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|-----|--|---|--|---|-----------------------|---|---|------------------------|-------------|
| 165 | Palm - 129 entries as listed in the report | PalmOil - N/A - Indirect                      | Environment and/or Human Rights - Multiple | Reports of land disputes, environmental infractions, human rights violations, corruption, and deforestation | Global Witness        |   | <p>04-Jun-2025: The case Erasakti Wiraforestama (EWF) has been closed as the allegation could not be substantiated. The Department of Manpower and Transmigration in Jambi Province, Indonesia, conducted a field investigation and found no evidence of child labor at the plantation.</p> <p>13-Nov-24: Most cases were closed following the investigation. Some remain under investigation.</p> <p>- PT Medco Papua Hijau Selaras : Capitol Group still has unresolved NDPE liabilities, notably from PT Medco Papua Hijau Selaras (MPHS). PT MPHS's HCV status is marked as withdrawn on the HCVRN site, and no updates on recovery plans or NDPE re-entry are available.</p> <p>- PT Erasakti Wiraforestama (Muaro Jambi) : Based on the information available from other grievance dashboard, the child labor issue involving PT Erasakti Wiraforestama (EWF) has reportedly been resolved, yet KTN remains without an NDPE commitment and still has unresolved liabilities. Without a company website, detailed progress on recovery and re-entry actions remains inaccessible.</p> <p>- PT Bumi Sawit Kencana : Capitol Group still has unresolved NDPE liabilities, notably from PT Medco Papua Hijau Selaras (MPHS). PT MPHS's HCV status is marked as withdrawn on the HCVRN site, and no updates on recovery plans or NDPE re-entry are available.</p> <p>- PT Anugerah Langkat Makmur: Based on our database, the liability for this group/company remains unresolved, and no specific updates are available regarding the progress of the given labor issue.</p> <p>- PT Delima Makmur- Based on our database, the liability for this group/company remains unresolved, and no specific updates are available regarding the progress of the given labor issue.</p> <p>07-Jan-2021: ADM has launched an investigation into the 129 listed cases provided by Global Witness. ADM reached out to its direct supplier for investigation and is requesting information to clarify the situations. Each case will be investigated and published in this grievance register as per grievance protocol. Currently, 26 cases remain under investigation.</p> | 1. Under Investigation | 4-Jun-25    |
| 295 | Del Monte Kenya                            | Pineapple - Kenya - Direct                    | Human Rights - Working Conditions          | Accusations of violence by supplier's security guards on the pineapple plantations in Kenya                 | Refresco Beverages UK | <p><a href="https://www.theguardian.com/world/2024/feb/08/del-monte-kenya-representatives-accused-of-seeking-to-cover-up-circumstances-of-mens-deaths">https://www.theguardian.com/world/2024/feb/08/del-monte-kenya-representatives-accused-of-seeking-to-cover-up-circumstances-of-mens-deaths</a></p> <p><a href="https://www.theguardian.com/world/2024/mar/15/i-saw-many-people-suffer-former-del-monte-kenya-guards-speak-of-violence-on-pineapple-farm">https://www.theguardian.com/world/2024/mar/15/i-saw-many-people-suffer-former-del-monte-kenya-guards-speak-of-violence-on-pineapple-farm</a></p> | <p>03-Jun-2025: ADM re-engaged with Del Monte and received the latest updates on the completion of the detailed action plan as of June 2025. Del Monte reported that significant progress has been achieved.</p> <p>21-Aug-2024: ADM engaged with Del Monte again and obtained the latest updates on completion of the action plan from July 2024. Significant progress have been declared achieved. For example, the progress report indicates that security services at the plantation have been outsourced.</p> <p>July-2024: Previously to the case being reported in the press, Del Monte has been assessed in context of the ADM Supply Chain Due Diligence program. Risk assessment resulted in High Risk exposure categorization. According to ADM supply chain due diligence process, ADM requested from Del Monte Kenyan a SEDEX SMETA 4-pilars audit. Del Monte Kenya shared their latest audit that was published in January 2023. The audit does not bring critical non-compliances. In the audit, there is non mentions related to accusations of violence by security guards of plantation.</p> <p>As one of our customer raised a grievance in February 2024, ADM engaged with Del Monte to investigate about the situation and collect additional information. Del Monte informed us that an action plan for Del Monte Kenya has been written and is being implemented in partnership with a local partner.</p>  | 2. Monitoring          | 3-Jun-25    |
| 18  | Tabung Haji Plantations (TH Plantations)   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>-PT Persada Kencana Prima                         | Mighty Earth          | Rapid Response Report 5   | <p>29-Apr-2025: Following engagement with our partners, as well as a thorough historical analysis and documentation review, ADM has decided to waive all recorded liabilities for TH Plantations in Jerantut, Pahang, Malaysia. This decision is based on the determination that the concession in Pahang does not appear to have been developed for oil palm cultivation. In addition, we acknowledge the ongoing recovery efforts of approximately 5,000 hectares in the Gunung Arong Forest Reserve, which are being carried out by TH Plantations in collaboration with GEC. We recognize this initiative as a form of corrective action in response to their past liabilities. Our supplier began the engagement process with this company in 2016. Through our direct supplier's monitoring, it was detected land use change at PT PKP in early July 2018. THP clarified that the area was originally cleared several years ago but was not planted due to operational constraints. THP claimed that the land use change detected is due the re-stacking of area now that planting is resuming. In the meantime, PT PKP continues to uphold their commitment to cease all activities on the ground. ADM is monitoring the progress through direct suppliers and public communications.</p>  | 2. Monitoring          | 29-Apr-25   |
| 288 | Abdi Budi Mulia                            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegations of land clearing  | Mighty Earth          | Rapid Response Report 44  | <p>22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring the supplier.</p> <p>8-Apr-2024: We have been engaging with our direct supplier and it was determined that the land clearing was carried out by local communities, in areas not in control of ADM's supplier, for the purpose of mix agriculture farming, including paddy, corn as well as oil palm cultivation.</p> <p>PT KHS carried out plasma development since January 2024 following pressure received by both local communities and the local government. Nevertheless, PT KHS has ceased all land clearing activities since May 2024 to mitigate risk of potential deforestation and has committed to conduct relevant assessments, including integrated HCV-HCSA assessment, before resuming plasma development. This decision and action is prior to the release of Mighty Earth Report 44.</p>   | 2. Monitoring          | 22-Apr-25   |
| 172 | Abdi Budi Mulia                            | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Abdi Budi Mulia 2 - Land dispute, waste dumping, other environmental infractions                            | Global Witness        |   | <p>22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring the supplier.</p> <p>7-Dec-2025: ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2015. Based on the assessment, an action plan and a number of development programs were developed. PT ABM confirmed to our direct supplier that they do not have a waste problem, and that all issues regarding community demonstrations were submitted to the responsible authorities.</p>  | 2. Monitoring          | 22-Apr-25   |

| ID  | Reported Group           | Supply Chain (Commodity-Country-Relationship) | Grievance Category                         | Description of the Grievance  | Reported By    | Reporting Source   | Investigation Updates & Actions Taken by ADM  | Status        | Last Update |
|-----|--------------------------|---|--|---|----------------|--|---|---------------|-------------|
| 171 | Abdi Budi Mulia          | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Abdi Budi Mulia 1- Land dispute, waste dumping, other environmental infractions                                       | Global Witness |  | 22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring the supplier.<br>7-Dec-2025: ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2015. Based on the assessment, an action plan and a number of development programs were developed. PT ABM confirmed to our direct supplier that they do not have a waste problem, and that all issues regarding community demonstrations were submitted to the responsible authorities.   | 2. Monitoring | 22-Apr-25   |
| 145 | TH Plantations Bhd       | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:                                    | Mighty Earth   | Rapid Response Report 14, 23, 27                                   | 22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring the supplier.<br>Based on our engagement with partners, and following a historical analysis and review of documents provided by them, we have agreed to drop all recorded liabilities for TH Plantations in Jerantut, Pahang, Malaysia, as the concession in Pahang does not appear to have been planted with oil palm.<br>In addition, we acknowledge the ongoing recovery efforts of approximately 5,000 hectares in the Gunung Arong Forest Reserve, which are being carried out by TH Plantations in collaboration with GEC. We recognize this initiative as a form of corrective action in response to their past liabilities.<br>2-Jun-2020: ADM reached out to direct supplier for investigation. Our direct supplier informed us that the area in question is outside of Hdroflow's concession, which was verified by a third-party. In addition, a stop work order was put in place at for Hydroflow's operations since September 2018. | 2. Monitoring | 22-Apr-25   |
| 133 | Fangiono Agro Plantation | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Tirta Madu Sawit Jaya                                  | Mighty Earth   | Rapid Response Report 22, 24, 25, 27                               | 22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring supplier.<br>29-Jun-2020: ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Tirta Madu Sawit Jaya's concession boundary.  | 2. Monitoring | 22-Apr-25   |
| 75  | TH Plantations Bhd       | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of peat development in the following concessions:<br>- TH Pelata Meludam Sdn Bhd                              | Mighty Earth   | Rapid Response Report 18   | 22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring supplier.<br>Based on our engagement with partners, and following a historical analysis and review of documents provided by them, we have agreed to drop all recorded liabilities for TH Plantations in Jerantut, Pahang, Malaysia, as the concession in Pahang does not appear to have been planted with oil palm.<br>In addition, we acknowledge the ongoing recovery efforts of approximately 5,000 hectares in the Gunung Arong Forest Reserve, which are being carried out by TH Plantations in collaboration with GEC. We recognize this initiative as a form of corrective action in response to their past liabilities.<br>29-Jun-2020: ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by TH Pelata Meludam Sdn Bhd. It happened outside of their concession.  | 2. Monitoring | 22-Apr-25   |
| 37  | TH Plantations Bhd       | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- Ladang Tabung Haji  | Mighty Earth   | Rapid Response Report 15, 18, 20                                   | 22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring the supplier.<br>Based on our engagement with partners, and following a historical analysis and review of documents provided by them, we have agreed to drop all recorded liabilities for TH Plantations in Jerantut, Pahang, Malaysia, as the concession in Pahang does not appear to have been planted with oil palm.<br>In addition, we acknowledge the ongoing recovery efforts of approximately 5,000 hectares in the Gunung Arong Forest Reserve, which are being carried out by TH Plantations in collaboration with GEC. We recognize this initiative as a form of corrective action in response to their past liabilities.<br>28-Jan-2022: Our direct supplier informed us that the concession Ladang Tabung Haji doesn't belong to TH Plantation Berhad since 2002 after it was divested to a non-related party.   | 2. Monitoring | 22-Apr-25   |
| 6   | Fangiono Agro Plantation | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Ketapang Hijau Lestari                                 | Mighty Earth   | Rapid Response Report 9  | 22-Apr-2025: Status of the grievance was changed from Closed to Monitoring, consultant is monitoring supplier.<br>29-Jun-2020: HCS/HCV assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organization with the HCSA. Based on our supplier's monitoring system, there was no land clearing at the HCV/HCS area identified at the integrated HCV/HCS map. FAP adopted a NDPE policy as well as other environmental certifications: <a href="http://fap-agri.com/kebijakan/">http://fap-agri.com/kebijakan/</a><br><a href="http://fap-agri.com/tentang-kami/">http://fap-agri.com/tentang-kami/</a><br>ADM considers this case close but continues to monitor the progress through direct suppliers and public communications.   | 2. Monitoring | 22-Apr-25   |
| 136 | Indonusa                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Internusa Jaya Sejahtera (Merauke) - area 2            | Mighty Earth   | Rapid Response Report 2  | ADM adopts a no buy position on the company.  | 3. Suspended  | 22-Apr-25   |
| 135 | Indonusa                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation, clearance prep/Stacking line in the following concessions:<br>- PT Internusa Java Sejahtera | Mighty Earth   | Rapid Response Report 2  | ADM adopts a no buy position on the company.  | 3. Suspended  | 22-Apr-25   |
| 11  | Indonusa                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Internusa Java Sejahtera                               | Mighty Earth   | Rapid Response Report 7, 10, 11, 12, 15, 17, 20, 22,23, 25, 27, 28 | ADM adopts a no buy position on the company.  | 3. Suspended  | 22-Apr-25   |
| 29  | Palma Serasih            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Global Primatama Mandiri                               | Mighty Earth   | Rapid Response Report 13, 21                                       | ADM adopts a no buy position on the company.  | 3. Suspended  | 14-Apr-25   |
| 13  | Musirawas Group          | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of peat development in the following concessions:<br>-PT Sumur Pandanwangi                                    | Mighty Earth   | Rapid Response Report 6, 10, 11                                    | 14-Apr-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Asam Jawa Group > Musirawas Group<br>13-Jul-2019: ADM adopts a no buy position on the company.   | 3. Suspended  | 14-Apr-25   |

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|-----|--|---|--|--|--------------------------|---|---|--------------|-------------|
| 47  | Unisource Group                          | PalmOil - Guatemala - Indirect                | Human Rights - Working Conditions        | Allegations of labor rights violations by palm oil producer Chiquibul in Guatemala.                                  | Reuters                  |   | 14-04-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Industria Chiquibul ><br>Unisource group<br>20-Jun-19: ADM adopts a no buy position on the company.   | 3. Suspended | 14-Apr-25   |
| 227 | IndoAgri                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of NDPE violations in the following concessions:<br>- PT Mitra Intisejati Plantation                         | Forest Peoples Programme | Demanding accountability  | 14-Apr-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Salim Group ><br>IndoAgri<br>15-Sep-2021: ADM adopts a no buy position on the company.   | 3. Suspended | 13-Apr-25   |
| 100 | IndoAgri                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Agro Subur Permai                                     | Mighty Earth             | Rapid Response Report 20, 21  | 14-Apr-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Salim Group ><br>IndoAgri<br>30-Nov-2019: ADM adopts a no buy position on the company.   | 3. Suspended | 13-Apr-25   |
| 82  | Borneo Pacific Group                     | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Arjuna Utama Sawit (area 2)                           | Mighty Earth             | Rapid Response Report 14, 18  | 14-Apr-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Pactra Group ><br>Borneo Pacific Group<br>26-Feb-2021: ADM adopts a no buy position on the company.  | 3. Suspended | 13-Apr-25   |
| 81  | Borneo Pacific Group                     | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Arjuna Utama Sawit (area 1)                           | Mighty Earth             | Rapid Response Report 14, 18  | 14-Apr-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Pactra Group ><br>Borneo Pacific Group<br>26-Feb-2021: ADM adopts a no buy position on the company.  | 3. Suspended | 13-Apr-25   |
| 22  | IndoGunta Group                          | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and clearance prep./stacking lines in the following concessions:<br>- PT Subur Karunia Rava | Mighty Earth             | Rapid Response Report 6, 9, 16, 25  | 14-Apr-2025: updating company name in suspension list to reflect the latest company's ownership structure: Tuan Junus Sutiono and Tuan Watson Dharma ->IndoGunta<br>20-Mar-2020: ADM adopts a no buy position on the company.   | 3. Suspended | 13-Apr-25   |
| 16  | IndoAgri                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Bintuni Agro Prima Perkasa                             | Mighty Earth             | Rapid Response Report 1   | 14-Apr-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Salim Group ><br>IndoAgri<br>30-Nov-2019: ADM adopts a no buy position on the company.   | 3. Suspended | 13-Apr-25   |
| 15  | IndoAgri                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Duta Rendra Mulya                                      | Mighty Earth             | Rapid Response Report 2   | 14-Apr-2025 : Updating company name in suspension list to reflect the latest company's ownership structure: Salim Group ><br>IndoAgri<br>30-Nov-2019: ADM adopts a no buy position on the company.  | 3. Suspended | 13-Apr-25   |
| 23  | Widya Corporation                        | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation, clearance prep./Stacking line in the following concessions:<br>- PT Mulia Inti Perkasa     | Mighty Earth             | Rapid Response Report 6, 15, 16, 20, 21, 22, 23,24,25, 26, 27, 28, 29   | 14-Apr-2025: Updating company name in suspension list to reflect the latest company's ownership structure: Tuan Junus Sutiono and Tuan Watson Dharma > IndoGunta<br>30-Jun-2021: ADM's direct supplier has been engaging with PT MIP since the end of 2017. PT MIP has put a long-term moratorium in of land clearing in place and has conducted an HCV assessment which has also been submitted for peer review:<br><a href="https://bit.ly/3pX4Wai">https://bit.ly/3pX4Wai</a>  | 4. Closed    | 13-Apr-25   |
| 292 | ADM                                      | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Report of deforestation related to soy supply chain in Maranhão and Bahia  | Aid Environment          | <a href="https://aidenvironment.org/publications/realtime-deforestation-monitoring-report-rdm-21-june-2024/">https://aidenvironment.org/publications/realtime-deforestation-monitoring-report-rdm-21-june-2024/</a>   | 11-Apr-2025: In July 2024, ADM received the 21 <sup>st</sup> Realtime Deforestation Monitoring report (RDM 21) including nine case studies linking deforestation and fire events to the soy supply chains in Brazil's Cerrado, Pantanal and Amazon biomes. An investigation was carried out into the producers and areas reported to verify whether they were part of the South American supply chain. It was found that of the nine cases listed, two farms were part of ADM's supply chain in Brazil for the 2023/2024 harvest. Environmental regularization guidance was provided to those involved.   | 4. Closed    | 11-Apr-25   |
| 272 | ADM                                      | Soybean - Brazil - Indirect                   | Environment - Deforestation & Conversion | Reports of fire events for soy and cattle  | Aid Environment          | Realtime Deforestation Monitoring- soy and cattle supply chains #8<br><br><a href="https://aidenvironment.org/wp-content/uploads/2023/01/LIFE_RDM_Report_8_Dec_2022.pdf">https://aidenvironment.org/wp-content/uploads/2023/01/LIFE_RDM_Report_8_Dec_2022.pdf</a> | 11-Apr-2025: In Realtime Deforestation Monitoring - soy and cattle supply chains #8, we received a case involving the Gameleira III farm in the municipality of Confresa/MT, which has more than 8,342 hectares of land embargoed by IBAMA (Brazilian Institute of Environment and Renewable Natural Resources), for initiating a process of deforestation of native vegetation. An investigation of the three producers involved in the case found that only one of them was part of ADM's supply chain in Brazil, specifically in the 2023 and 2024 harvests. Despite the environmental embargo on the area, an analysis of satellite images for the 2024/2025 harvest showed that there was no continuation of the illegal activity, and agricultural management was not carried out in the areas indicated in the report. All producers involved have formal blocks in our purchasing systems, for socio-environmental analysis before any commercial movement.   | 4. Closed    | 11-Apr-25   |
| 269 | Group of SOY farmers/growers in Paraguay | Soybean - Paraguay - Indirect                 | Human Rights - Land Dispute              | Reports of alleged social conflicts between indigenous communities/agrarian reform settlements and SOY farmers.      | Global Witness           |   | 11-Apr-2025: On August 26th, ADM received from Global Witness an e-mail contact requesting explanation on (7) alleged cases of social conflicts between indigenous communities/agrarian reform settlements and SOY farmers who could be link to ADM in different locations in Paraguay.ndigenous related conflicts: Huguá Po'í Loma Piro'y Campo Agua'e Ka'a Poty Colonia Yeruti Agrarian reform settlements conflicts.<br>All suppliers were engaged and interviewed. Interviewees denied the accusations of illegal use of agrochemicals, illegal land grabbing, using violent forced evictions and/or the destruction of community housing and property. Besides the traceability verification, documents and other evidences were presented to ratify the statements. Some did admit that there is tension with local neighboring communities, something also reported by the local media.<br>The lack of VAT contribution to the Paraguayan treasury in FYs 2020 and 2021, mentioned in sections 8(f) and 8(g) of the Global Witness report, is explained by the fact that such contributions are measured as a result of sales in the domestic market of Paraguay that are taxed by VAT. The main activity of ADM Paraguay is the export of commodities, which, like all other exports, is VAT exempt, so it is only natural, under Paraguayan tax system, that no taxpayer whose main sales are made to the international market through exports make any VAT contribution at all. | 4. Closed    | 11-Apr-25   |

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|-----|---|---|--|---|------------------------------------|--------------------------|---|------------------------|-------------|
| 316 | Jalan Abesin Group (PT SSS)   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegations of land clearing  | Mighty Earth                       | Rapid Response Report 48 | 11-Mar-2025: Investigation revealed that allegations are connected to Musirawas company, but not to Jalan Abesin Group. ADM adopt a no-buy position on Musirawas.   | 4. Closed              | 11-Mar-25   |
| 315 | Pulo Padang Sawit Permai mill   | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Allegation of deforestation and conflicts with activists  | Upfield                            |                          | 04-Feb-2025: ADM reached out to its direct supplier. ADM direct supplier explained that Pulo Padang Sawit Permai mill successfully demonstrated its legality by providing the required documents. The Supreme Court of Republic of Indonesia sentenced the nominated activist to 6-month of prison for violence against police officers during a demonstration. The outcome of the trial against the mentioned activist has been reached according to local justice procedures.   | 2. Monitoring          | 4-Feb-25    |
| 314 | OLEOFLORES SAS  | PalmOil - Columbia - Indirect                 | Environment and/or Human Rights - Multiple | Allegations of social conflict  |                                    |                          | 27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring the investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.   | 1. Under Investigation | 27-Jan-25   |
| 313 | Compañía Palma Tica SA (subsidiaria de Compañía Industrial Aceitera Coto Cincuenta y Cuatro SA) | PalmOil - Costa Rica - Indirect               | Environment - Deforestation & Conversion   | Allegations of land clearing  |                                    |                          | 27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.   | 1. Under Investigation | 27-Jan-25   |
| 312 | NaturAceites SA   | PalmOil - Guatemala - Indirect                | Environment and/or Human Rights - Multiple | Allegations of social conflict  |                                    |                          | 27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.   | 1. Under Investigation | 27-Jan-25   |
| 311 | Poligrow Colombia SAS   | PalmOil - Columbia - Indirect                 | Environment - Deforestation & Conversion   | Allegations of land clearing  |                                    |                          | 27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.   | 1. Under Investigation | 27-Jan-25   |
| 150 | KTS   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- Wawasan Sedar Sdn Bhd | Mighty Earth                       | Rapid Response Report 25 | 6-Jan-2025: ADM is currently monitoring the supplier. Via its direct suppliers, ADM obtained a commitment of KTS to comply with NDPE principles.<br>2023: Supplier was suspended as deforestation continued with 248 ha of forest/peat cleared. This activity was carried out by KTS PELITA (Simunjan) Sdn Bhd and Wawasan Sedar Sdn Bhd.<br>2016-2022: the total liability of Wawasan Sedar was 532 ha. This liability is for first Binary Plantation (Kuching) Sdn Bhd, KTS PELITA (Simunjan) Sdn Bhd, and Wawasan Sedar Sdn Bhd.<br>ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.   | 2. Monitoring          | 6-Jan-25    |
| 277 | NaturAceites  | PalmOil - Guatemala - Indirect                | Human Rights - Working Conditions          | Allegations with respect to human rights  | Christliche Initiative Romero e.V. |                          | 14-Nov-2024: According to the NDP monitoring database, Naturaceites currently shows no liability. However, social issues, such as land disputes and worker-related conflicts, have intensified tensions with local communities. Recently, Control Union suspended both of its RSPO P&C certificates. Naturaceites has since appealed, submitting the case to the RSPO complaint panel, which is now under investigation. Based on the latest information, since the appeal is ongoing, we have updated the status to "Monitoring" until a final verdict is issued.<br>23-Dec-2023: ADM reached out to its supplier for investigation. Our direct supplier provided an official statement by NaturAceites on the allegations raised in February 27, 2023 towards violations to the land rights of the Maya. NaturAceites strongly ratifies its non-involvement or influence in this situation. ADM will continue to monitor the case.  | 2. Monitoring          | 14-Nov-24   |
| 199 | Tayan Bukit Sawit   | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Tayan Bukit Sawit - Suspected licensing violations  | Global Witness                     |                          | 13-Nov-2024: According to our liability data, PT Tayan Bukit Sawit has no recorded liability. However, the company lacks NDPE, RSPO, and ISPO commitments, and there is limited available information on social issues. Notably, unresolved partnership issues persist, with local cooperatives in Sanggau demanding a 20% revenue share as per regulations.<br>ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they are currently engaging with TBS and awaiting a response. ADM will continue to monitor the case.   | 2. Monitoring          | 13-Nov-24   |
| 208 | Gemilang Jaya Kencana Abadi/ Putra Keritang Sawit   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Putera Keritang Sawit - Waste dumping, purchasing FFB grown illegally   | Global Witness                     |                          | 07-Nov-2025: ADM reached out to its direct supplier for investigation. Our direct supplier engaged with PKS and the immediate actions were required to prevent the purchase of illegally grown FFB in the future. Apical together with their consultants conducted a verification visit to PKS. They found that appropriate actions were taken to ensure no illegal FFB sourcing ( <a href="https://www.apicalgroup.com/sustainability/grievances/apical/">https://www.apicalgroup.com/sustainability/grievances/apical/</a> ). PT PKS also attended Apical's Shared Value Program workshop in 2016 and 2017 which aims to assist their suppliers to build their capacity to adopt more sustainable practices. PT PKS has provided traceability data to Apical who continues to monitor their supply chain closely.<br>Jun-2023: AAK immediately reached out to our Tier 1 suppliers and Earthqualizer for investigation. Tier 1 supplier responded with 8 mills (1 identified mill) under Anam Koto Group, TTP 100% for all and no deforestation status is 84-100% and on progress<br>Jun-2023: AAK responded to the article regarding palm sourcing in Tesso Nilo on AAK's website. <a href="https://www.aak.com/news-and-media/press-releases/2023/aaks-response-to-the-article-regarding-palm-sourcing-in-tessa-nilo/">https://www.aak.com/news-and-media/press-releases/2023/aaks-response-to-the-article-regarding-palm-sourcing-in-tessa-nilo/</a><br>Oct-2023: T1 suppliers confirmed 100% TTP and no sourcing from Tesso Nilo National Park. | 2. Monitoring          | 7-Nov-24    |

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|-----|--------------------------|---|--|---|--------------|--------------------------------------|--|---------------|-------------|
| 20  | Tsani Hutani Abadi Group | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Harapan Rimba Jaya      | Mighty Earth | Rapid Response Report 2, 5, 9        | <p>07-Nov-2024: THA made significant progress on its sustainability program and has been publicly reporting updates though its first two progress reports. THA signed a letter of intent with Yayasan Konservasi Alam Nusantara (YKAN), which is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments.</p> <p>Golden Agri Resources (GAR) has acquired THA (PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya) and are now part of GAR's operations. GAR will follow the RSPO Remediation and Compensations Procedure to address and past deforested lands by the purchased entities in the West Kutai/ East Kalimantan area.</p> <p>THA published 1st progress report re its NDPE implementation. See here <a href="https://bit.ly/37ReGu4">https://bit.ly/37ReGu4</a></p> <p>THA published 2nd progress report <a href="https://bit.ly/2JMPJHZ">https://bit.ly/2JMPJHZ</a></p> <p>GAR announced the acquisition of PT Tsani Hutani Abadi ("THA"), PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya.</p> <p>THA entities have become part of GAR own operations. GAR will no longer continue the re-entry engagement with THA. Instead, as an RSPO-member, GAR will follow the RSPO Remediation and Compensation Procedure (RaCP) to address any past deforestation by the acquired companies and also to comply with the RSPO P&amp;C.</p>  | 2. Monitoring | 7-Nov-24    |
| 19  | Tsani Hutani Abadi Group | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Rayatama Jaya           | Mighty Earth | Rapid Response Report 2, 5, 6, 9, 14 | <p>07-Nov-2024: THA made significant progress on its sustainability program and has been publicly reporting updates though its first two progress reports. THA signed a letter of intent with Yayasan Konservasi Alam Nusantara (YKAN), which is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments.</p> <p>Golden Agri Resources (GAR) has acquired THA (PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya) and are now part of GAR's operations. GAR will follow the RSPO Remediation and Compensations Procedure to address and past deforested lands by the purchased entities in the West Kutai/ East Kalimantan area. THA published 1st progress report re its NDPE implementation. See here <a href="https://bit.ly/37ReGu4">https://bit.ly/37ReGu4</a></p> <p>THA published 2nd progress report <a href="https://bit.ly/2JMPJHZ">https://bit.ly/2JMPJHZ</a></p> <p>GAR announced the acquisition of PT Tsani Hutani Abadi ("THA"), PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya.</p> <p>THA entities have become part of GAR own operations. GAR will no longer continue the re-entry engagement with THA. Instead, as an RSPO-member, GAR will follow the RSPO Remediation and Compensation Procedure (RaCP) to address any past deforestation by the acquired companies and also to comply with the RSPO P&amp;C.</p> <p>Following extensive engagement with our partners, as well as a thorough historical analysis and documentation review, ADM has decided to waive all recorded liabilities for TH Plantations in Jerantut, Pahang, Malaysia. This decision is based on the determination that the concession in Pahang does not appear to have been developed for oil palm cultivation.</p> | 2. Monitoring | 7-Nov-24    |
| 129 | Triputra Agro Persada    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the Triputra Agro Persada, company: Dwiwira Lestari Jaya. | Mighty Earth | Rapid Response 12                    | <p>07-Nov-2024: ADM reached out to direct supplier for investigation. ADM obtained clarification from its direct supplier. Those information are available on GAR Internal Monitoring website.</p> <p>30-Aug-2021: TAP updated GAR that PT BBB's revised map was already sent to the RSPO and it was received by the RSPO Membership Executive. TAP also provided GAR with a copy of the receipt dated 23/8/2021 as evidence. Given the evidence, GAR has decided to close this case.</p> <p>11-May-2021: Given the publication of TAP's NDPE commitment, the completion of PT DLJ peer review, the satisfactory clarification for the allegations, and no more deforestation indication detected, we have closed these cases.</p> <p>6-Jul-2021: PT BBB shared the results of the ground-truthing at the location. It was verified that the clearance mentioned in the Rapid Response Report 34 is outside the PT BBB concession boundary (using HGU as reference). Based on the ground-truthing, the cleared area is controlled by the local community and was previously a rubber plantation.</p> <p>14-Dec-2020: in addition to its RSPO commitment, Triputra Agro Persada publicly published NDPE policy at group level.</p>  | 4. Closed     | 7-Nov-24    |
| 117 | Kwantas Corporation      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Kwantas Corporation       | Mighty Earth | Rapid Response Report 17, 21         | <p>07-Nov-2024: Based on EQ's analysis of the Might Earth report, the deforestation allegation is outside the Kwantas boundary. The case has been clarified with accurate information and resolved.</p>  | 4. Closed     | 7-Nov-24    |
| 61  | Kwantas Corporation      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Kwantas Pelita Plantation | Mighty Earth | Rapid Response Report 14, 17, 20, 26 | <p>07-Nov-2024: We were informed that the land in questions is within the parameters of Kwantas Pelita Plantation (Balingan) Sdn Bhd (KPPSB) concession. However, this land does not belong to KPPSB as it has not been surrendered to KPPSB through the Native Customary Right (NCR) Land Aquisition project. The land is in privately owned and KPPSB has not been involved in any clearing activities.</p>  | 4. Closed     | 7-Nov-24    |

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|-----|---|---|--|--|--------------|--------------------------------------|---|---------------|-------------|
| 3   | Austindo Nusantara Jaya Agri (ANJ Group)  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Putera Manunggal Perkasa | Mighty Earth | Rapid Response Report 10, 11         | 07-Nov-2024: Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE:<br><a href="https://bit.ly/2xvqx9N">https://bit.ly/2xvqx9N</a><br>ANJ has met many milestones on its sustainability efforts including: revamping its group-wide sustainability policy, sharing concession boundaries, its HCS clearance liability, the target recovery area, a framework for rehabilitation project, and a grievance mechanism. These details can be found under:<br><a href="https://anj-group.com/en/sustainability-approach-and-policies">https://anj-group.com/en/sustainability-approach-and-policies</a><br>ANJ has communicated with Mighty Earth and also shared the first progress report of its recovery plan programme:<br><a href="https://bit.ly/3koUwwH">https://bit.ly/3koUwwH</a><br>The second progress report can be found under:<br><a href="https://bit.ly/3iqzNtu">https://bit.ly/3iqzNtu</a><br>Based on detailed review of documentation and reports from ANJ, the Wilmar Suspension Committee have given due consideration of this progress and have lifted the suspension on ANJ in March 2021. MusimMas will continue to monitor their progress (April 2021). GAR has changed the engagement status with ANJ into "Monitoring" (closed for monitoring), where GAR will intensely track the progress of the Recovery Plan Implementation and regularly evaluate ANJ's commitment to comply with GARs Social and Environmental Policy (April 2020). | 4. Closed     | 7-Nov-24    |
| 2   | Austindo Nusantara Jaya Agri (ANJ Group)  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:                                 | Mighty Earth | Rapid Response Report 3, 4, 6, 8, 10 | 07-Nov-2024: Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE:<br><a href="https://bit.ly/2xvqx9N">https://bit.ly/2xvqx9N</a><br>ANJ has met many milestones on its sustainability efforts including: revamping its group-wide sustainability policy, sharing concession boundaries, its HCS clearance liability, the target recovery area, a framework for rehabilitation project, and a grievance mechanism. These details can be found under:<br><a href="https://anj-group.com/en/sustainability-approach-and-policies">https://anj-group.com/en/sustainability-approach-and-policies</a><br>ANJ has communicated with Mighty Earth and also shared the first progress report of its recovery plan programme:<br><a href="https://bit.ly/3koUwwH">https://bit.ly/3koUwwH</a><br>The second progress report can be found under:<br><a href="https://bit.ly/3iqzNtu">https://bit.ly/3iqzNtu</a><br>Based on detailed review of documentation and reports from ANJ, the Wilmar Suspension Committee have given due consideration of this progress and have lifted the suspension on ANJ in March 2021. MusimMas will continue to monitor their progress (April 2021). GAR has changed the engagement status with ANJ into "Monitoring" (closed for monitoring), where GAR will intensely track the progress of the Recovery Plan Implementation and regularly evaluate ANJ's commitment to comply with GARs Social and Environmental Policy (April 2020). | 4. Closed     | 7-Nov-24    |
| 308 | Prima Bahagia Permai (Permai Estate), Koperasi Sawit Sejahtera Bersama (Plasma) via Ijm Plantations | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Indirect via third party suppliers/traders.  | Grupo Bimbo  |                                      | 4-Nov-2024:The inherited liability from IJM Group (the previous concession owner) is still undergoing a final liability calculation and LUCA assessment under the RACP (RSPO) recovery scheme.  | 2. Monitoring | 4-Nov-24    |
| 307 | Gawi Bahandep Sawit Mekar via Triputra Agro Persada   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Indirect via third party suppliers/traders.  | Grupo Bimbo  |                                      | 4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.   | 4. Closed     | 4-Nov-24    |
| 306 | Prima Bahagia Permai (Bahagia Estate) via Ijm Plantations   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Indirect via third party suppliers/traders.  | Grupo Bimbo  |                                      | 4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.   | 4. Closed     | 4-Nov-24    |
| 305 | Kalimantan Ria Sejahtera via Agrindo  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Indirect via third party suppliers/traders.  | Grupo Bimbo  |                                      | 4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.   | 4. Closed     | 4-Nov-24    |
| 304 | Karya Makmur Langgeng via Bumitama Agri   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Indirect via third party suppliers/traders.  | Grupo Bimbo  |                                      | 4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.   | 4. Closed     | 4-Nov-24    |
| 303 | Tetangga Akrab  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Land clearing  | Mighty Earth | Rapid Response Report 46             | 22-Oct-2024: ADM's consultancy service investigated on companies'ownership structure and concluded different ownerships than suggested by the grievance. The supply chain analysis found that the indirect supplier of ADM is not supplying to Tetangga Akrab Mill 1 or Mill 2. Finally, the imagery analysis concluded that no clearing was observed within Green DevelopmentMr. Tam Tian Ting's group is not supplying to Tetangga Akrab Mill 1 or Mill 2. In addition, from our high-resolution imagery analysis, we have not observed any clearing within Pure Green Development's concession block.  | 4. Closed     | 22-Oct-24   |
| 301 | PT Mulia Inti Perkasa (Widya Corporation Group)   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Land clearing  | Upfield      |                                      | 11-Oct-2024: for PT Mulia Inti Perkasa (Widya Corporation Group), Widya Corp issued a Stop Work Order (SWO) on August 20, 2018, and committed to NDPE principles on May 8, 2019. PT MIP submitted its HCV assessment to the HCVRN website in April 2021, with the HCS assessment available on the HCSA website in July 2023. Widya Corp confirmed liability for 2,692.66 ha of forest loss in their concession from 2015 to 2022. They committed to a 5,640 ha village forestry recovery program in Desa Long Ayap, Berau, East Kalimantan.   | 2. Monitoring | 11-Oct-24   |
| 299 | PT Berau Karetindo Lestari  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Land clearing  | Upfield      |                                      | 11-Oct-2024: Engagement with direct supplier in progress.   | 2. Monitoring | 11-Oct-24   |
| 298 | PT Internusa Jaya Sejahtera Under Indonusa Group  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Land clearing  | Upfield      |                                      | 11-Oct-2024: The company has made a NDPE re-entry commitment by publishing a Stop Work Order (SWO), committing to NDPE principles, conducting HCV-HCS assessments, NDPE time-bound plan and confirming their liability. However, there is no publication yet regarding their recovery progress report.  | 3. Suspended  | 11-Oct-24   |

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|-----|---|--|--|---|------------------|---|---|------------------------|-------------|
| 300 | PT Satria Hupasarana  | PalmOil - Indonesia - Indirect                   | Environment - Deforestation & Conversion | Land clearing   | Upfield          |   | 11-Oct-2024: PT Satria Hupasarana has no liability recorded.  | 4. Closed              | 11-Oct-24   |
| 294 | PT Prasetya Mitra Muda:<br>NSS Group                          | PalmOil - Indonesia - Indirect                   | Environment - Deforestation & Conversion | Land clearing   | Mighty Earth     | Rapid Response Report 45  | <p>26-Aug-2024: PMM had carried out an HCS/HCV study followed by peer review since 2019 (see <a href="https://bit.ly/2CyAL4N">https://bit.ly/2CyAL4N</a>) and the land development had consistently been based on the "go area" as per the HCSA/HCVRN guidance and therefore GAR's regular monitoring of PMM is also based on the HGU boundary used in the HCS/HCV assessment. Fyi, to be clear, the recent "incident" (the clearance reported by Mighty) occurred in an area that was not included yet in the HCS/HCV study.</p> <p>In a commitment/statement letter to GAR, dated 12 July 2024, PMM admitted the land clearance indications reported by Mighty Earth. The clearance of the area occurred within the license owned by the Company and was part of the process of submission of boundaries and HGU. PMM reiterates that it remains committed to NDPE and the clearance occurred due to miscommunication within PMM's internal team.</p> <p>To mitigate this and demonstrate its commitment, PMM is committed to the following:</p> <ol style="list-style-type: none"> <li>1. The Company will immediately stop land clearing in the Company's concession area which has not yet been studied in HCS/HCV.</li> <li>2. The Company will immediately carry out an (additional) HCS/HCV study in the targeted areas for further development followed by an integrated peer review process by HCVRN.</li> <li>3. Land development will resume after the (additional) HCS/HCV study is completed for the area that is declared as the "go" area. The company will follow the guidance regarding all changes that might occur in the peer process review, if there is any.</li> <li>4. The Company acknowledges the calculation of the Company's responsibility for the aforementioned deforestation and will use it as a basis for a recovery plan program if needed according to the results of the HCS/HCV study.</li> </ol> <p>GAR will keep monitoring the progress</p> | 2. Monitoring          | 26-Aug-24   |
| 293 | Mutiara Pelita Genaan<br>Plantation – Double<br>Dynasty Group | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion | Land clearing   | Mighty Earth     | Rapid Response Report 45  | 26-Aug-2024: Double Dynastly submitted an action plan and was approved for resuming business with ADM direct supplier. Double Dynastly is being added to ADM grievance log and its progress towards completion of action plan are monitored.  | 2. Monitoring          | 26-Aug-24   |
| 36  | Double Dynasty Holdings<br>Sdn Bhd                            | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion | Reports of deforestation, clearance prep/Stacking line in the following concessions:                | Mighty Earth     | Rapid Response Report 15, 16, 18, 19, 20, 25  | ADM is monitoring the supplier.   | 2. Monitoring          | 20-Aug-24   |
| 31  | Double Dynasty Group  | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion | Reports of clearance prep./stacking lines in the following concessions: –<br>Radiant Lagoon Sdn Bhd | Mighty Earth     | Rapid Response Report 1   | ADM is monitoring the supplier.   | 2. Monitoring          | 20-Aug-24   |
| 123 | QL Resources Sdn Bhd  | PalmOil - Indonesia - Indirect                   | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Pipit Mutiara Indah                  | Mighty Earth     | Rapid Response 21, 27, 28   | <p>10-Jul-2024: ADM reached out to direct supplier for investigation. Our direct supplier informed us that they conducted a field visit to PT PMI in in early 2020 to check the compliance on the NDPE policy and the guidance they had provided to QL Resources Group. The group commitet to the Development Recovery Plan for Non-Compliant Land Clearing and has displayed considerable progress on its commitments. ADM will continue to monitor the case. QL need to publish recovery area boundary in public domain. Due to non-compliance to the NDPE policy, ADM's direct supplier have ceased sourcing from QL Group of companies where the last purchase was in November 2019. Several meetings have taken place since then to guide QL Group of companies to the compliance of NDPE policy and meeting the re-entry criteria.</p> <p>A field visit to PT PMI was conducted in January 2020 to assess the situation on the ground and develop an action plan for PT PMI to close the gaps identified during the field visit. In April 2020, QL Group met all the criteria stipulated in the re-entry criteria, including their commitment to the Development of Recovery Plan for Non-Compliant Land Clearing to NDPE policy at group level incurred from January 2016 onwards.</p> <p>Based on detailed review of documentation, reports and letter of commitment from QL Group, ADM's direct supplier Suspension Committee have given due consideration of this progress and have lifted the suspension on QL Group in April 2020.</p>  | 2. Monitoring          | 10-Jul-24   |
| 284 | Prison Labor in U.S Supply<br>Chains                          | N/A - United States of America - Direct          | Human Rights - Working Conditions        | Reports of elevated risk for human rights violations  | Associated Press | <a href="https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e">https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e</a> | 8-Jul-2024: ADM has contracted with a prison entity on a rehabilitation program that is designed to allow prisoners with upcoming release dates to begin working to build skills and knowledge that will enable a smooth transition to life after incarceration. These employees receive the same training and safety gear as all employees, and are paid the same rate. We are investigating implementation of the program with ILO guidance to ensure prison labor is voluntary.  | 1. Under Investigation | 8-Jul-24    |

| ID  | Reported Group                                    | Supply Chain (Commodity-Country-Relationship) | Grievance Category                         | Description of the Grievance  | Reported By          | Reporting Source  | Investigation Updates & Actions Taken by ADM  | Status        | Last Update |
|-----|---|---|--|---|----------------------|---|---|---------------|-------------|
| 289 | Astra Agro Lestari                                | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Land grabbing environmental, human rights, and governance violations illegal palm oil cultivation ongoing intimidation criminalization of environmental human rights defenders operations without required permits. | Friends of the Earth | <a href="https://foe.org/wp-content/uploads/2024/06/AAL_Cultivating_Conflict_Eng_final.pdf">https://foe.org/wp-content/uploads/2024/06/AAL_Cultivating_Conflict_Eng_final.pdf</a>   | <p>8-Jul-2024: Our direct suppliers are engaging with AAL to implement appropriate measure to improve practices at AAL concessions, and make sure the situation on site is not violating any of ADM policies. A well-directed and measurable plan, agreed upon by all parties, will help to resolve disputes and conflicts.</p> <p>1- Concession permits within forest areas and deforestation</p> <p>The presence of concessions in forest areas does not necessarily imply deforestation, as the status of forest areas does not always mean that the area is still forested. If verified that AAL's subsidiaries indeed have concessions overlapping with forest areas, the regulation on encroachment as stipulated in Law No. 6 of 2023 on Job Creation will be applied to these subsidiaries. The biggest challenge is the almost complete lack of public access to this information, as all details of the process and information are managed by the government and are exempt from public disclosure. The government only provides general information such as the number of companies and the area included in categories of articles 110A and 110B.</p> <p>2- Implementation of FPIC mechanisms as an initial remediation process</p> <p>The argument by AAL and EcoNusantara that the absence of an FPIC mechanism at the start of company operations renders FPIC irrelevant now is incorrect, as Indonesian civil law principles and Supreme Court jurisprudence allow for this to be addressed.</p> <p>3- Repeated intimidation of communities</p> <p>In its report, FoE reveals that two women from Rio Mukti Village have experienced repeated intimidation by AAL staff in the field, who questioned the reason for their opposition and pressured them to retract their statements and demands. This repeats various instances of intimidation and criminalization previously carried out by AAL's subsidiaries in the past.</p> | 2. Monitoring | 8-Jul-24    |
| 286 | ADM   | Soybean - Brazil - Indirect                   | Environment - Deforestation & Conversion   | Report of deforestation related to soy  | Aid Environment      |   | In May 2024, ADM received the 20 <sup>th</sup> Realtime Deforestation Monitoring (RDM 20) report including nine case studies linking deforestation and fire events to the soy and cattle supply chains in Brazil's Cerrado, Pantanal and Amazon biomes.   | 4. Closed     | 8-Jul-24    |
| 285 | SLC Agricola                                      | Cotton - Brazil - Direct                      | Environment and/or Human Rights - Multiple | Reports of human rights and environmental violations  | EarthSight           |   | ADM engaged with SLC Agricola who is an active supplier of ADM to have additional information regarding a report publicly available in the media by an NGO with alleged Human Rights and environmental issues linked to farms operated by SLC Agricola. In less than 24 hours, SLC responded with documents and evidence which were also publicly available and accessible to the general public in different medias. All areas in operation have been legally cleared under the Brazilian Forest Code legislation and have the proper licenses. Regarding the area in the Capão Modesto region in Bahia, which the Report claims to have a land dispute, SLC explained that they have a land lease of a farm where they plant cotton which has its legal reserve allocated in a different property/area located 40km away from where they operate (as the Forest code from the country legislation allows). The NGO Report claims that this area, where the legal reserve is allocated, is linked to human rights conflicts as there is a dispute on property rights. SLC presented the documents of the land titles and licenses of the land in dispute, demonstrating who is the rightful owner of the land. About the deforestation accusation of over 1000 hectares in Fazenda Palmares, the company presented evidence that this area of native vegetation, which was never - and still is not - in production, was affected by a natural fire in 2022, something common in the dry season in the Cerrado biome. They have presented documents showing that this unintentional fire, which was fought and controlled by them, was reported to the local environmental authorities. Furthermore, the company has shown that the area is recovering its original native vegetation and is not being used for agricultural purposes.   | 4. Closed     | 8-Jul-24    |
| 283 | Prison Labor in U.S Supply Chains                 | N/A - United States of America - Direct       | Human Rights - Working Conditions          | Reports of elevated risk for human rights violations  | Associated Press     | <a href="https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e">https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e</a> | 8-Jul-2024: ADM received an inquiry from the Associated Press. The reporter noted elevated risks for human rights violations in various U.S supply chains linked to prison labor. ADM began looking into its supply chains for instances of violations to its Human Rights Policy. ADM has identified a direct supplier who has not been able to provide sufficient documentation to confirm all conditions specified by the ILO for voluntary prison labor have been satisfied. Until such evidence is provided, ADM has ceased doing business.  | 4. Closed     | 8-Jul-24    |
| 282 | Prison Labor in Southeast U.S Peanut Supply Chain | Peanut - United States of America - Indirect  | Human Rights - Working Conditions          | Reports of elevated risk for human rights violations  | Associated Press     | <a href="https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e">https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e</a> | 8-Jul-2024: ADM received an inquiry from the Associated Press. The reporter linked prison labor to ADM's subsidiary, Golden Peanut. ADM communicated to the AP and its customers that our policies explicitly prohibit forced labor of any kind in our operations and supply chains. The supplier in question is indirectly linked to Golden Peanut through a 3rd party commissioned agent. The supplier has not been able to provide sufficient documentation to confirm all conditions specified by the ILO for voluntary prison labor have been satisfied. ADM has communicated to our direct supplier that we are unable to accept grain from the prison until such evidence is provided.   | 4. Closed     | 8-Jul-24    |
| 290 | ADM   | Soybean - Brazil - Indirect                   | Human Rights - Land Dispute                | Soy supply chain issue: Sourcing grains indirectly grown illegally on Indigenous territory in South of Brazil   | Reuters              |   | ADM engaged with suppliers mentioned and both confirmed there was no commercial relationship or soy sourced from the areas mentioned in the report we received. It is important to note that those two areas are on a process to "officially" become Indigenous Reservations under local legislation, so there are still private areas farming soy legally today within the boundaries of the area that eventually may become an Indigenous Reservation. The COOPs have an extensive network of country elevators spread throughout the state. 1 COOP has a country elevator close to these 2 areas.  | 4. Closed     | 12-Jun-24   |

| ID  | Reported Group                     | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance   | Reported By                        | Reporting Source         | Investigation Updates & Actions Taken by ADM   | Status        | Last Update |
|-----|------------------------------------|---|--|--|------------------------------------|--------------------------|--|---------------|-------------|
| 210 | Sime Darby                         | PalmOil - Malaysia - Direct                   | Human Rights - Working Conditions        | Reports of human rights violations   | U.S. Customs and Border Protection |                          | ADM reached out to direct supplier for investigation. Sime Darby (SD) is in the process of clarifying with the U.S. Customs and Border Protection (CBP) what the exact allegations against them are in order to be able to rectify what has caused the implementation of the Withhold Release Order (WRO). SD has openly engaged with the CBP and Liberty Shared, the issuers of the petition to the CBP, and provided a list of their existing practices in relation to the areas of concern outlined in the petition: <a href="https://bit.ly/3ogrwxq">https://bit.ly/3ogrwxq</a> SD has been reporting on the progress of its Human Rights and Labor Program for a number of years: <a href="https://bit.ly/3Mmh5jO">https://bit.ly/3Mmh5jO</a> PwC was appointed to strengthen SD's human rights compliance. In order to maintain its RSPO certification, SD must also undergo annual third party audits, which include stringent requirements on labor practices. The latest audit findings of the RSPO did not generate any red flags against SD. However, the RSPO will also conduct an investigation: <a href="https://bit.ly/39wX1wB">https://bit.ly/39wX1wB</a> SD appointed Impactt Ltd. to conduct a third party labor assessment of their Malaysian plantations. The outcome of this assessment and the resulting corrective action plan to address issues found shall be a key step towards lifting the CBP's WRO. | 4. Closed     | 17-Apr-24   |
| 189 | Sumber Jaya Indahnusa              | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute              | Kota Tergah - Land dispute, indigenous persons affected  | Global Witness                     |                          | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that land compensation for the community has been carried out. The HGU permit expires in 2021, our direct supplier recommends that 500 ha of land claimed by the Malay community be used as plasma as a conflict resolution effort, even though the company had previously provided plasma with an area of approximately 5000 ha. The company wants to maintain the 500 ha because the land is in the HGU which will be extended. Therefore our direct supplier also suggests that SJI identify the history of land ownership of 500 ha when it was first obtained and identification of Malay tribes about their relationship with the original owner of the land (from which tribe, is it recognized by the district / provincial customary institutions) and conduct participatory CSR (social) programme analysis with communities affected by company activities.   | 4. Closed     | 17-Apr-24   |
| 185 | Garuda Food/ Garuda Bumi Perkasa   | N/A - Indonesia - Indirect                    | Human Rights - Land Dispute              | Garuda Bumi Perkasa - Land dispute, waste dumping  | Global Witness                     |                          | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2017. Based on the assessment, an action plan and a number of development programs were developed. The main problem that has emerged in publicly reported information (which has been confirmed) is complaints from residents regarding environmental issues. Tracing results with stakeholders indicated that the main problem was poor social relations with the village head, who played a role in the Mesuji area. The mill has fixed the problem and currently relations with the community are quite good.   | 4. Closed     | 17-Apr-24   |
| 179 | Bengkulu Sawit Lestari             | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute              | Bengkulu Sawit Lestari - Land dispute, waste dumping   | Global Witness                     |                          | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. The land dispute is being verified in the field. The location permit has indeed expired, but it has no impact on operations because they already have an IUPB. A location permit is only a preliminary permit from the regional government to initiate the compensation process. Currently in the verification process with the village head and local community leaders. The audit team is still on the plantation. So the results of the investigation are not final. Our direct supplier also informed us that the news on waste was incorrect. Based on the Decree of the Minister of Environment and Forestry no SK.696 / Menlhk / Setjen / Kum.1 / 12/2017 dated 15 December 2017, the results of the performance improvement assessment (Proper) program have been issued and PT. BSL gets the blue proper. PT BSL mill is a is used as a pilot in South Bengkulu regarding waste management. After the news appeared in the newspaper, the BSL team contacted the local environmental agency. The results of the examination found that the upstream and downstream river water in the waste storage outlet was in line with the standard.  | 4. Closed     | 17-Apr-24   |
| 115 | PT.Socfindo                        | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem  | RAN - Rainforest Action Network    |                          | ADM conducted a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool. Socfindo (Aek Loba) and Socfindo (Pks Tanah Gambus) both have a low overall threat index value. ADM will continue to monitor the development of these values.  | 4. Closed     | 17-Apr-24   |
| 228 | PT Inti Nusa Sejahtera/ PT Capitol | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of NDPE violations in the following concessions:<br>- PT Mitra Austral Sejahtera                                   | Forest Peoples Programme           | Demanding accountability | The case is currently under review by the RSPO Complaints Panel. ADM recognizes and heeds the RSPO's Complaints System and is monitoring the outcome through the RSPO case tracker: <a href="https://rspo.my.site.com/Complaint/s/case/50090000028ErzsAAC/detail">https://rspo.my.site.com/Complaint/s/case/50090000028ErzsAAC/detail</a> . CP's decision letter has been furnished: <a href="https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000zdoi/6kzFMyMgMQbXU_ru1JUXMG57V1pdXeTQQCbU.QgkgIY">https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000zdoi/6kzFMyMgMQbXU_ru1JUXMG57V1pdXeTQQCbU.QgkgIY</a> The Appeals Panel's decision letter is delivered: <a href="https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/GB00000109qs/AgKkNsTq1F.0g6hyYhLVDJ59b3BfCPsH7valQyABs">https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/GB00000109qs/AgKkNsTq1F.0g6hyYhLVDJ59b3BfCPsH7valQyABs</a>   | 2. Monitoring | 31-Jan-24   |
| 39  | Ta Ann Group                       | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Ladang Selezu Sdn Bhd  | Mighty Earth                       | Rapid Response Report 15 | Our supplier is investigating the allegation and a field verification on the deforestation allegation in the week of 23rd July. Moratorium of land clearing has been put in place while investigation is ongoing. A field assessment was done by the supplier's team and it was verified that clearing activities were done outside the concession boundaries of Ladang Selezu. Ta Ann Group is suspended due to unresolved case.  | 3. Suspended  | 31-Jan-24   |
| 281 | First Resources                    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation claiming connection Fangiono Agro Plantation (FAP) Agri, New Borneo and Cliandry Anky Abadi (CAA) | The Gecko Project                  |                          | Based on an investigation carried out, it was confirmed that First resources, CAA, FAP and New Borneo are separate entities. First Resources mentioned that FAP Agri is a separated entity but one of First Resources suppliers. FAP Agri has been demonstrating good commitment to sustainability with HCV Assessment and compliance with First-Resources' NDPE policy. First Resources claimed that it operates respectfully of its NDPE policy and RSPO is an additional proof of non-deforestation.  | 4. Closed     | 31-Jan-24   |

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|-----|-------------------------|---|--|--|---------------------------------|--------------------------------------|--|-----------|-------------|
| 241 | Sumber Tani Agung Tbk   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | The company is sourcing from PT Sawit Sukses Sejati, who allegedly violates NDPE policies.                           | Mighty Earth                    | Rapid Response Report 39             | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT Sawit Sukses Sejati (SSS) used to supply FFB to their supplier, PT Sumber Tani Agung (STA) but they are no longer a consistent supplier to PT STA after they built their own mill in 2022. There were some ad hoc FFB delivery to STA in 2022 when PT SSS's mill running into operational issues. When the allegation of deforestation on PT SSS was brought to PT STA's attention, PT STA has immediately shared the Rapid Response report 39 with PT SSS for investigation. In the meantime, PT STA has ceased sourcing from PT SSS. PT Teguhkarsa Wanalestari, PT Asia Sawit Lestari and PT Prima Mas lestari have denied to be associated or buying from PT SSS. It was found that ADM is linked to Sikarakara mill. Sikarakara mill, PT Rimba Mujur Mahkota/Pasifik Agro Sentosa was allegedly sourcing from PT SSS. Sikarakara mill/PT Rimba Mujur Mahkota/Pasifik Agro Sentosa group have confirmed that PT SSS is no longer in their supply chain (last purchase was in January 2022).       | 4. Closed | 29-Dec-23   |
| 240 | Jernih Kemboja          | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concession:<br>- PTD 1815                      | Mighty Earth                    | Rapid Response Report 38, 40         | ADM reached out to its direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation. Effective March 31, 2022, our direct supplier suspend Jernih Kemboja Sdn. Bhd from its supply chain following evidence of deforestation in Malaysia obtained via satellite imagery. Our direct suppliers began an engagement process with Jernih Kemboja Sdn. Bhd to support their efforts that meet our policies standards. Sep-22:Concluded investigations have confirmed that there is non-compliance to the No Deforestation commitment in the NDPE Policy. Therefore, our direct suppliers have stop purchasing from Jernih Kemboja from September-22 onwards and will continue engaging with them to meet the requirements in their re-entry criteria. Our direct supplier has also updated and registered this case on their public grievance log. Kindly refer here for more information: <a href="https://www.wilmar-international.com/sustainability/grievance-procedure">https://www.wilmar-international.com/sustainability/grievance-procedure</a> | 4. Closed | 29-Dec-23   |
| 220 | Wings Agro              | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Gawi Makmur Kalimantan    | Mighty Earth                    | Rapid Response Report 34             | ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the Wings Group has reiterated its commitment to land development guided by and in adherence with HCV and HCS assessments. Direct supplier is no longer sourcing from PT GWK or sourcing from Wings Agro. Dec-21: No purchase data as of H2 2021 traceability data. Based on an analysis carried out, Wings Agro issued an NPDE commitment and did not carry out deforestation in 2023.  | 4. Closed | 29-Dec-23   |
| 217 | First Resources         | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:                                   | Aid Environment                 |                                      | The case is currently under review by the RSPO Complaints Panel. ADM recognizes and heeds the RSPO's Complaints System and is monitoring the outcome through the RSPO case tracker: <a href="https://sforce.co/3wlmxf">https://sforce.co/3wlmxf</a> The Secretariat is preparing the Briefing Note along with the full chronology of the recent developments. The CP has deliberated the Complaint and the Decision Letter has been furnished to the parties.  | 4. Closed | 29-Dec-23   |
| 216 | Bumi Gading Prima (BGP) | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Bumi Agro                 | Mighty Earth                    | Rapid Response Report 33             | ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that they have reached out PT Bumi Agro Prima (BAP). PT BAP agreed to a land clearing moratorium and have signed a commitment stating so: <a href="https://bit.ly/2PVdW2f">https://bit.ly/2PVdW2f</a> . Given the moratorium commitment, PT BAP commitment letter on the moratorium here <a href="https://bit.ly/2PVdW2f">https://bit.ly/2PVdW2f</a> . Given the moratorium commitment, our direct supplier has decided to close this case for monitoring. In 2023, Mulia Gading Mas Group did not carry out deforestation, Group has been considered for removal from the suspended list.  | 4. Closed | 29-Dec-23   |
| 153 | Group Olmeca            | PalmOil - Guatemala - Indirect                | Environment and/or Human Rights - Multiple | Reports of human rights violations - Reforestadora de Palma de Peten SA (REPSA)                                      | RAN - Rainforest Action Network |                                      | The social issues that occurred at REPSA have been resolved, REPSA has been considered for removal from the suspended list in May 2022. Previously, ADM was adopting a no buy position on the company.   | 4. Closed | 29-Dec-23   |
| 116 | NaturAceites            | PalmOil - Guatemala - Indirect                | Human Rights - Working Conditions          | Allegations with respect to human rights   | Reuters                         |                                      | ADM reached out to direct supplier for investigation. Our direct supplier informed us that he immediately engaged Naturaceites following the allegations. To date, evaluations conducted by neutral third parties have shown that Naturaceites has been in compliance with the sustainable palm oil policy from our supplier.  | 4. Closed | 29-Dec-23   |
| 107 | PT. Bumi Daya Agrotamas | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem  | RAN - Rainforest Action Network |                                      | From 2016-2023, ADM conducted an investigation led by an independant consultat which concluded that PT BDA did not carry out deforestation.  | 4. Closed | 29-Dec-23   |
| 70  | Pinehill Pacific Bhd    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Makmur Jaya Malindo                                   | Mighty Earth                    | Rapid Response Report 18, 19, 27, 28 | ADM reached out to direct supplier for investigation. We were informed that Pinehill Pacific Bhd has divested their Malaysian operations and they are no longer associated with PT MJM. Jun-22: No purchase reflected as of H2 2021 data. Based on an analysis of the Might Earth report, PT Makmur Jaya Malindo is a subsidiary of Pinehill Pacific Bhd. PT Makmur Jaya Malindo has no liability because it did not carry out deforestation in 2016-2023.   | 4. Closed | 29-Dec-23   |
| 26  | Unknown Group           | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation, clearance prep.Stracking lines in the following concessions:<br>-PT.Krida Dharma Kahuripan | Mighty Earth                    | Rapid Response Report 5, 6, 11, 12   | PT Krida Dharma Kahuripan did not carry out deforestation in 2016-2023. PT Krida Dharma Kahuripan has been considered for removal from the suspended list. Previously, ADM was adopting a no buy position on the company.  | 4. Closed | 29-Dec-23   |
| 24  | Unknown Group           | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>-PT Condong Garut  | Mighty Earth                    | Rapid Response Report 4              | PT Condong Garut is owned by Mr. Hutomo Mandala Putra. No deforestation was carried out from 2016-2023. Company has been considered for removal from the suspended list. Previously, ADM was adopting a no by position on the company.   | 4. Closed | 29-Dec-23   |
| 280 | Wings Agro              | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and peat development in the following concession:<br>- PT GAWI Makmur Kalimantan            | Mighty Earth                    | Rapid Response 34                    | ADM's direct supplier confirmed is no longer from PT Gawi Makmur Kalimantan and Wings Agro group. There is no linkage to ADM since 2021 Q4. Based on an analysis carried out, Wings Agro issued an NPDE commitment and did not carry out deforestation in 2023.  | 4. Closed | 28-Dec-23   |

| ID  | Reported Group                         | Supply Chain (Commodity-Country-Relationship) | Grievance Category                         | Description of the Grievance   | Reported By   | Reporting Source                            | Investigation Updates & Actions Taken by ADM  | Status        | Last Update |
|-----|--|---|--|--|---|---|---|---------------|-------------|
| 234 | Padasa Enam Utama                      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of NDPE violations in the following concessions:<br>- Koto Kampar  | Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara         |   | ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on both allegations.<br>1) Suspected development of plantations in the convertible production forest (HPK) and protected forest (HL) in Koto Kampar - our direct supplier informed us that this is a legacy issue. PT PEU (Koto Kampar) had obtained legal permits for its land and operations long before the area was categorized/designated as forest zone. PT PEU is a holder of an HGU title No. 14/HGU/BPN/92 issued by the National Land Agency in 1992. HGU is the highest "rank/strata" of land title a palm oil company can possibly obtain. The government (National Land Agency) wouldn't have granted the HGU title for PT PEU if there had been a forest one overlapping issue. PT PEU is also a holder of ISPO certificate. Legality is the most important aspect in ISPO's principles and Criteria. See Principle No.1 in the table here: <a href="https://peraturan.go.id/common/dokumen/bn/2020/bn1377-2020.pdf">https://peraturan.go.id/common/dokumen/bn/2020/bn1377-2020.pdf</a><br>2) Suspected of purchasing, storing, processing fresh fruit bunches harvested from the area of protected forest in Koto Kampar - this will require further investigation and engagement with PT PEU. The outcome will determine any further actions.   | 2. Monitoring | 8-May-23    |
| 223 | Chora Agro Resources                   | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Reports of NDPE violations in terms of land rights, labor rights, and environmental concerns in the following concession:<br>- PT Mitra Abadimas Sejahtera | Local community stakeholders, cooperatives, and oil palm farmers. |   | Following ADM's investigation, it appears PT MAS is operating legally as they have already obtained all legal permits, including location permit, plantation business permit (IUP) and land use permit (Hak Guna Usaha, HGU). They have also fulfilled their plasma obligations as well as provided compensation for land acquisition to the previous landowner. It is important to note that there are no community settlements, buildings, graves and community houses within the boundaries of PT MAS's IUP and HGU. On the matter of labour conditions, majority of workers are from local communities of Subah sub-district and they appeared to have good relationship with PT MAS. PT MAS has also provided documentation proof that their workers welfare is protected, including insurance coverage.   | 4. Closed     | 29-Mar-23   |
| 209 | Astra Agro Lestari                     | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Sari Aditya Loka 1 - Land dispute, evictions, violent confrontation, indigenous persons affected   | Global Witness  |   | 29-Mar-2023: ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Covid-19 protocol was to ensure only personell of PT SAL entered the premises. A confrontation resulted in unrest, upon which local police was called to avoid any further conflict. Mediation efforts are ongoing, and PT SAL has been providing assistance to the community and the Orang Rimba peoples in the surrounding area. AAL's public response can be found under: <a href="https://bit.ly/2Ub1GfU">https://bit.ly/2Ub1GfU</a><br>In AAL Response letter, it stated that AAL has provided assistance in form of education, healthcare, and economic opportunities to the orang Rimba dating back to 2001 so as to improve their quality of life. AAL is also committed to a NDPE policy and publishes its sustainability report both annually and quarterly which is publicly available.  | 2. Monitoring | 23-Mar-23   |
| 273 | Sarawak Oil Palm/Shin Yang             | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and peat development in the following concession:<br>- LPF/0018   | Mighty Earth  | Rapid Response 15,18,19,20,21               | ADM adopts a no-buy position for this supplier.   | 3. Suspended  | 27-Feb-23   |
| 88  | Tunas Baru Lampung / Sungai Budi Group | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Samora Usaha Jaya (B)   | Mighty Earth  | Rapid Response 19 & Chain Reaction Research | ADM adopts a no-buy position for this supplier.   | 3. Suspended  | 27-Feb-23   |
| 113 | PT. Bangun Sampurna Lestari            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem  | RAN - Rainforest Action Network                                   |   | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT BSL has conducted a verification based on the coordinates provided by RAN and found the indirect supplier is not in line with the NDPE policy. Therefore, PT BSL has decided to stop sourcing FFB from their supplier since 18 October 2022.<br>Our direct supplier will monitor the implementation of PT BSL's commitment, based on the above information.<br>On 1 July 2021, FGV published an update on its sustainability efforts. <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> . A further statement on FGV's progress in addressing the WRO was published on 18 June 2021. FGV reiterated its sustainability commitments and highlighted several initiatives that are being implemented, focused on improving its migrant worker recruitment process, developing human rights capacity building and training programmes, as well as strengthening its grievance mechanisms and enhancing labour monitoring systems.<br><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/?pagen=1">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/?pagen=1</a> . On 16 November 2021, FGV announced that following a review of proposals from several organisations, the company had finalised the appointment of ELEVATE <a href="https://www.fgvholdings.com/press_release/fgvs-update-on-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1">https://www.fgvholdings.com/press_release/fgvs-update-on-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1</a> | 4. Closed     | 27-Feb-23   |
| 10  | Incasi Raya                            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation, peat development and peat forest development in the following concessions:   | Mighty Earth  | Rapid Response Report 10                    | On 28 February, 2023, FGV issued a press release: <a href="https://www.fgvholdings.com/press_release/fgvs-fy2022-financial-performance-charts-new-record-since-listing/">https://www.fgvholdings.com/press_release/fgvs-fy2022-financial-performance-charts-new-record-since-listing/</a> , stating that they have concluded its on-site assessments and FGV is implementing recommendations from their supply chain service provider and anticipated to submit the final report to CBP in the near future. Our direct supplier is maintaining regular communication with FGV to monitor their progress.  | 4. Closed     | 27-Feb-23   |
| 243 | Ta Ann Group                           | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- LPF 0010   | Mighty Earth  | Rapid Response Report 35                    | ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that they were investigating the case prior to the publication of EIA . However, direct suppliers confirmed that it has suspended PT PSM since Aug 2022 due to the deforestation case. PT PSM has found to sell FFB to one of our indirect suppliers. Our direct suppliers has engaged them and they have stopped purchasing from PT PSM. Direct supplier is no longer linked to PT PSM.   | 3. Suspended  | 29-Nov-22   |

| ID  | Reported Group                | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance  | Reported By                     | Reporting Source   | Investigation Updates & Actions Taken by ADM   | Status    | Last Update |
|-----|-------------------------------|---|--|---|---------------------------------|--|--|-----------|-------------|
| 154 | Permata Hijau                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Ommiting mills from mill list that are tied to deforestation  | RAN - Rainforest Action Network |  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that Permata Hijau acknowledges and regrets this lapse in their mill list. They also commit to cease all sourcing from the mill in question, investigate their standard operating procedures, update their mill list, share no purchase list with our direct supplier, and issue a public statement. Our direct supplier is engaging with PH on discussion to verify their traceability report and mill list, as well as mediating dialogue between RAN and PH. Our direct supplier sent alerts to those supplier mills that KA has been deemed non-compliant with the direct supplier Social and Environmental Policy. We asked them to check and confirm that KA is not in their supply chain. All the supplier mills have confirmed that KA is not in their supply chain. In addition, according to information/sources from the field, KA owns and operates its own palm oil mill, and all FFB from KA's estate are supplied to KA mill. No purchase, our direct suppliers has taken necessary actions to prevent Kallista Alam mill to be in their supply chain.                                    | 4. Closed | 29-Nov-22   |
| 112 | PT. Delima Makmur             | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem                                   | RAN - Rainforest Action Network |  | ADM conducted a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool. PT Delima Makmur has a low overall threat index value. ADM will continue to monitor the development of these values. Direct supplier, TTP is 100%, monitoring will be conducted. The disputed land identified is not in PT Delima Makmur. <a href="https://putusan3.mahkamahagung.go.id/direktori/putusan/19fc350dd7755964ab0e081cd05f0707.html">https://putusan3.mahkamahagung.go.id/direktori/putusan/19fc350dd7755964ab0e081cd05f0707.html</a> . Based on the investigation by the Aceh High Prosecutor's Office (Kejaksaan Tinggi Aceh) has dropped the case. Hence, the case against PT DM and the directors has been resolved legally.   | 4. Closed | 29-Nov-22   |
| 109 | PT. Perkebunan Lembah Bakti I | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem                                   | RAN - Rainforest Action Network |  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. Sep-21: Perkebunan Lembah Bakti I & II have reached 100% TTP <a href="https://www.astra-agro.co.id/en/traceability-4/">https://www.astra-agro.co.id/en/traceability-4/</a> . Our direct supplier has stated that they are no longer buying from PT Laot Bangko and PT Indo Sawit Perkasa which are deforesting inside the Leuser Ecosystem.   | 4. Closed | 29-Nov-22   |
| 268 | ADM                           | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle   | Aid Environment                 | Realtime Deforestation Monitoring- soy and cattle supply chains #5 | In September, ADM received from Aid Environment the report Realtime Deforestation Monitoring- soy and cattle supply chains #5 by e-mail contact requesting explanation on (7) alleged cases of land clearing for soy and cattle who could be link to ADM in different locations in Bahia - Brazil. Among the 7 farms, ADM made recent negotiations with two of them. The areas were opened after planting soybeans in the 2021/2022 crop, so ADM do not received soybeans from the newly opened area. We have gathered all the necessary documentation to prove the legality of the land conversion of Fazenda Santa Maria. We are waiting for the documentation of Fazenda Indiana, future negotiations were suspended until the presentation of the necessary documentation to validate the legality of the land conversion.   | 4. Closed | 20-Nov-22   |
| 221 | Tripura Agro Persada          | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Brahma Binabakti | Mighty Earth                    | Rapid Response Report 34   | ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the area in question is outside of PT BB's concession area. Based on ground-truthing, the field belongs to the local community and used to be a rubber plantation. According to our direct supplier, they do not source directly from PT brahma Binabakti. Please see the verification report: <a href="https://bit.ly/3qONoOi">https://bit.ly/3qONoOi</a><br>TAP's internal policy is to not share HGU boundaries, but since they are RSPO members, they sent a revised map to the RSPO Membership Executive, and also provided our direct supplier with a copy of the receipt date on August 23, 2021. The map on the georSPO website will corrected. Given the evidence, GAR has decided to close this case.  | 4. Closed | 2-Aug-22    |
| 242 | Eagle High Plantations Tbk    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Khatulistiwa Agro Abadi / First Borneo Group | Mighty Earth                    | Rapid Response 40  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT AUS is still listed in the EHP's latest Consolidated Financial Statements as receivables and payables due to the absence of an 'offset' agreement. However, EHP confirmed that their CPO purchase contract with PT AUS ended in Sep 2018 and EHP have not sold FFB to PT AUS since 9 Dec 2019 and PT AUS is on their no purchase list. Since then, EHP have not entered into transactions with PT AUS. The reason why PT AUS appears on PT EHP's annual report/ financial statement is because they still have a debt to PT EHP for their previous business transaction before 2019 and that debt is not fully paid. PT AUS and PT EHP have yet reached an agreement on the debt payment; hence, we will still foresee PT AUS being mentioned in the financial report until this issue is resolved.  | 4. Closed | 1-Aug-22    |
| 105 | PT. Global Sawit Semesta      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife              | RAN - Rainforest Action Network |  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that he is engaging with the PT GSS and a field verification visit has occurred. PT GSS has layed out action plan. A sustainability officer and GIS expert have been hired to conduct traceability to plantation work. Based on the results from the verification visit, PT GSS is implementing its action plan to verify their processes to ensure raw material is procured from compliant sources. Another visit to PT GSS is planned by our direct supplier. The report can be found here: <a href="http://bit.ly/2E4moTr">http://bit.ly/2E4moTr</a> . An action plan was been developed between direct supplier and GSS. It includes mapping of high-risk areas, which is to be shared with all FFB suppliers, request all FFB suppliers to commit to sourcing only from non-protected areas, stop FFB purchase from suppliers without a signed commitment letter, suppliers should commit to sourcing from no exploitation, respecting land rights and document traceability of FFB suppliers shed. Action plan will be monitor by direct supplier. An NDPE policy has been signed and TTP at 100%. | 4. Closed | 1-Aug-22    |

| ID  | Reported Group  | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance   | Reported By   | Reporting Source                             | Investigation Updates & Actions Taken by ADM   | Status       | Last Update |
|-----|---|---|--|--|---|--|--|--------------|-------------|
| 212 | Bunga   | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:   | Mighty Earth  | Rapid Response Report 32                     | ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation. Our direct supplier informed us that Bunga has been engaged with and have adopted a group NDPE policy as well as a moratorium for any future oil palm plantation development. Bunga mentioned that the purchasing agreement stated that the land was suitable for planting and contained only shrubs. Bunga group has confirmed that there was no clearing of any primary of secondary forest in the concession in question. ADM will continue to monitor this case. Bunga Group has a commitment to the development of a recovery plan for non-compliant land clearing to the NDPE policy at group level. ADM considers this case closed.  | 4. Closed    | 26-May-22   |
| 182 | Campang Tiga  | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute              | Campang Tiga - Land dispute  | Global Witness  |  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. PT Campang Tiga (CT) explained to our direct supplier that the incident was related to a land dispute with another company. The incident was reported to the police. A mediation process was also initiated by the South Sumatera Provincial Government. Our direct supplier requested further information and documents from CT, as well as checking other sources to verify the information. In 2016, our direct supplier met with CT and was told that it is pursuing mediation with the local community. It had also started legal proceedings against the company which is alleged to be involved in the incident. CT will make a public announcement when the verdict is issued by court. ADM continues to monitor the case.  | 4. Closed    | 26-May-22   |
| 114 | PT. Nafasindo   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem  | RAN - Rainforest Action Network                           |  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. Nafasindo provided clarification regarding the RAN allegations. It was explained that there was an error due to wrong data issued by the provincial authority (BPN Kanwil Prop Aceh). Nafasindo explained that in 2016, the company acting on the provincial and district governments' letter released 347 hectares of land that had been under its control control as part of the dispute resolution between the communities in 22 villages and the company. ADM considers this case closed.   | 4. Closed    | 26-May-22   |
| 106 | PT. Samudera Sawit Nabati                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife Reserve in the Singkil-Bengkung | RAN - Rainforest Action Network                           |  | ADM reached out to direct supplier for investigation. Our direct supplier engaged with PT GSS to seek responses to the allegations contained in the RAN report. Furthermore, PT SSN declared that they did not source from CV Buana Indah as mentioned in the RAN report. An on-site field verification of the allegations was conducted. It was found that there are no SOPs in the mill and that TTP was relatively low. An action plans has been laid out by PT SSN in this regard. Based on the results of the verification visit, PT SSN will implement action plans to verify their processes to ensure raw material is procured from compliant sources. A third-party will be commissioned to conduct another visit. The report can be found here: <a href="http://bit.ly/2E4moTr">http://bit.ly/2E4moTr</a><br>PT SNN has verified its achievement of 100% TTP. Our direct supplier has also engaged PT SNN in its supplier program, which has been completed: <a href="https://bit.ly/2A0UOYD">https://bit.ly/2A0UOYD</a> . ADM considers this case closed. | 4. Closed    | 26-May-22   |
| 245 | Brazil - Eighteen properties listed in the tracker report | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle  | Mighty Earth  | Rapid Response Soy and Cattle Tracker Report | ADM reached out and engaged with its direct suppliers for investigation. The investigation concluded that there was no volume sourced from areas of deforestation, few suppliers had conversion. Those suppliers with conversion have sent legal land conversion authorizations/licenses, which are in accordance with the local legislation and our No Deforestation Policy. We have decided to discontinue doing business with 1 supplier until he resolves a pending issue.   | 4. Closed    | 4-Apr-22    |
| 239 | Dewa Rencana Perangin Angin                               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of NDPE violations in the following concessions:<br>- Dewa Rencana Perangin Angin                                      | Mongabay  |  | ADM adopts a no buy position on the company.   | 3. Suspended | 4-Mar-22    |
| 233 | Incasi Raya   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of NDPE violations in the following concessions:<br>- Sumbar Andalas Kencana   | Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara |  | ADM reached out to its direct supplier for investigation. ADM is requesting information to direct supplier to clarify the situation. Our direct supplier informed us that conducted an investigation, identifying that PT SAK only source FFB from their own plantation and their ex-plasma smallholder. The Plasma was developed by PT SAK and they are still supporting the core activities including maintenance, harvesting, and delivering to the PT SAK mill. ADM therefore considers this case closed.  | 4. Closed    | 4-Mar-22    |
| 141 | Bumitama Group  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:   | Mighty Earth  | Rapid Response Report 23                     | ADM reached out to direct supplier for investigation. Our direct supplier informed us that these land changes were cause by forest fires due to dry season conditions. PT ASM responded to these fires as fast as possible with their fire-response personnel. The incidents were reported to local authorities as well as the RSPO. Bumitama follows HCS/HCV approach and the NPP by the RSPO as well as working together with local communities: <a href="http://bitly.ws/obwh">http://bitly.ws/obwh</a><br>Bumitama's further clarification on the land verification: <a href="http://bit.ly/BumitamaClarificationToGAR">http://bit.ly/BumitamaClarificationToGAR</a>   | 4. Closed    | 28-Jan-22   |
| 139 | Sampoerna Agro  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Usaha Agro Indonesia  | Mighty Earth  | Rapid Response Report 22                     | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT UAI was not involved in any deforestation activity. The land in question belongs to the community, and the landowners do not intend to turn over their land to the company. Sampoerna Agro has an NDPE commitment in place.  | 4. Closed    | 28-Jan-22   |
| 132 | Eagle High Plantations Tbk                                | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Arrtu Energie Resources   | Mighty Earth  | Rapid Response Report 22                     | ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT AER was affected by fires that came from outside of their concession due to extreme dry weather conditions in Indonesia. PT AER has no intetion to open new areas for palm development due to its new planting moratorium since 2017. Eagle High Plantation informed that fire prevention and management measures are being implemented. A verification visit was arranged to PT AER and an action plan has been proposed. The results of the study can be found here: <a href="https://bit.ly/2L4NYqi">https://bit.ly/2L4NYqi</a><br>An update on the PT AER Action Plan can be found here:   | 4. Closed    | 28-Jan-22   |

| ID  | Reported Group   | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance   | Reported By    | Reporting Source                                     | Investigation Updates & Actions Taken by ADM   | Status    | Last Update |
|-----|--|---|--|--|----------------|--|--|-----------|-------------|
| 125 | TSH Resources Bhd  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Bulungan Citra Agro Persada   | Mighty Earth   | Rapid Response Report 21                             | ADM reached out to direct supplier for investigation. Our direct supplier informed us that TSH Resources Bhd adheres to their no burning policy as an RSPO member. TSH Resources commissioned Malaysian Environmental Consultants (MEC) which found that the clearing overlaps with recent massive local community land burning in Kalimantan Utara.   | 4. Closed | 28-Jan-22   |
| 122 | Makin  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Cipta Karsa Kahuripan   | Mighty Earth   | Rapid Response Report 21, 22                         | ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT CKK ceased operations in 2016, and the land in question has been returned to the government. PT CKK has not performed any activity on the land. A notarized letter showing the company had ceased operations in 2016 was provided.   | 4. Closed | 28-Jan-22   |
| 40  | Genting Plantations Bhd                                    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Permata Sawit Mandiri   | Mighty Earth   | Rapid Response Report 15, 17, 19, 20, 23             | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the concession PT Permata Sawit Mandiri doesn't belong to Genting Plantation Bhd since 2017 after it was divested to a non-related party. Genting Plantation's official statement can be found here: <a href="http://bit.ly/2wMjoaH">http://bit.ly/2wMjoaH</a>  | 4. Closed | 28-Jan-22   |
| 34  | Perkebunan Nusantara                                       | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Perkebunan Nusantara II Prafi   | Mighty Earth   | Rapid Response Report 15                             | Our direct supplier informed us that PT Perkebunan Nusantara has divested the concession in question since 2014.   | 4. Closed | 28-Jan-22   |
| 33  | Genting Plantations Bhd                                    | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Citra Sawit Cemerlang   | Mighty Earth   | Rapid Response Report 14, 15, 16, 17, 19, 23, 24, 27 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the concession PT Permata Sawit Mandiri doesn't belong to Genting Plantation Bhd since 2017 after it was divested to a non-related party. Genting Plantation's official statement can be found here: <a href="http://bit.ly/2wMjoaH">http://bit.ly/2wMjoaH</a>  | 4. Closed | 28-Jan-22   |
| 246 | Group of SOY farmers/growers in Correntina, Bahia (BRAZIL) | Soybean - Brazil - Direct                     | Human Rights - Land Dispute              | Reports of alleged land tenure issues/social conflicts between traditional local communities and SOY farmers in Correntina, Bahia (Brazil) | Global Witness |  | On November 3rd, 2021 ADM received from Global Witness an e-mail contact requesting explanations on an alleged case of social conflict between a local traditional community called Capao do Modesto and soy growers who could be linked to ADM in Correntina, Bahia (BRAZIL). Due to Covid-19 restrictions and the short timeframe (6 days) given by GW to respond, all contacts were done over the phone. ADM opened its grievance protocol, conducted a series of individual interviews with the farmers listed in GW's report who are suppliers of ADM, and responded to Global Witness by NOV 9th. Local community members names were not disclosed by GW, making it difficult for ADM to reach out to them. A new Socio-environmental due diligence was redone on all farms under production, including the lands used as offsets which were being disputed. So far the investigation found that: 1) The lands on dispute are more than 150km from the farms from where ADM sources soy - all soy farms are in compliance with the Brazilian Forest Code and the Company's policies. Some of these farms are even certified under sustainable standard schemes. 2)The lands on disputes are owned by the farmers (legal land deeds and environmental permits/licences were provided to ADM). These lands have no farm production, only native vegetation, and serve as offsets of native vegetation (Legal Reserves) to areas under production (150km away) 3) These private areas were being constantly trespassed by 8 local community members who were using these areas irregularly and in disagreement with the Forest Code. 4) The Farmers/owners went to court to avoid people from trespassing. The case was trialed and farmers won on 3 instances. 5) All suppliers interviewed deny having used violence or harassment against the traditional communities. 6) The investigation concluded that farmers are the legal owners of these lands. That these lands are in compliance with the Brazilian legislation and that the suppliers are in compliance with the Company's policies. No evidences of violent acts/harassment were found, and all suppliers deny this ever happened. | 4. Closed | 12-Jan-22   |
| 238 | Dharma Satya Nusantara Tbk (DSN)                           | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concession:  | Mighty Earth   | Rapid Response Report 37                             | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT Kencana Alam Permai (KAP) parent's group, Dharma Satya Nusantara Tbk (DSN) is a member of RSPO since 2008, and all of their land development for palm is bound by RSPO Principles and Criteria. DSN has also made public commitment to NDPE policy ( <a href="https://bit.ly/32k8M5E">https://bit.ly/32k8M5E</a> ) where their last land clearing activities was in 2015. Specifically on the case on PT KAP, our direct supplier has initiated engagement with DSN since October 2021 to seek clarification on deforestation alert detected through their internal monitoring programme. PT KAP has carried out field investigation and confirmed that the clearance was carried out by five local communities for farming, including paddy planting. The area in question has not been surrendered to the company as the local communities are not keen to be involved in oil palm development. Therefore, PT KAP does not have full control over the said area. The outcome of the investigation has also been shared with the head village and endorsed ( <a href="https://bit.ly/3yMo5k2">https://bit.ly/3yMo5k2</a> ) by the head village accordingly. PT KAP's official response to the case is available here:   | 4. Closed | 20-Dec-21   |
| 237 | Musim Mas  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concession:<br>- PT Multipersada Gatramegah                          | Mighty Earth   | Rapid Response Report 37                             | ADM reached out to its direct suppliers for investigation. Our direct suppliers informed us that area identified in the report is neither HCV nor HCS area. This area has been assessed and covered under the following assessment reports:<br>a) HCV Report of PT Harisa Agro Lestari ( <a href="https://bit.ly/3EcxZMP">https://bit.ly/3EcxZMP</a> ) that has obtained satisfactory status (note: the area was part of PT Harisa Agro Lestari, which PT MPG officially acquired on 1st April 2018);<br>b) HCS Report of PT Multipersada Gatramegah in 2018 that has covered the area in question ( <a href="https://bit.ly/3qa10Uk">https://bit.ly/3qa10Uk</a> ) which has completed HCSA review process ( <a href="https://bit.ly/3pe7PVS">https://bit.ly/3pe7PVS</a> );<br>c) This area has also undergone the RSPO NPP process ( <a href="https://bit.ly/3spPEyf">https://bit.ly/3spPEyf</a> ).<br>All reports are published and available on HCVRN, HCSA, and RSPO websites, respectively.   | 4. Closed | 20-Dec-21   |
| 7   | Felda Global Ventures                                      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of peat development in the following concessions:<br>- PT Temila Agro Abadi  | Mighty Earth   | Rapid Response Report 9                              | Our direct suppliers connected with Felda Global Ventures Holding are closely following up their actions. FGV continues to publicly reporting their progress and effort in addressing the grievances via their website: <a href="https://www.fgvholdings.com/sustainability/reports-updates/">https://www.fgvholdings.com/sustainability/reports-updates/</a><br>Our direct supplier informed us that FGV has a stop work order for TAA since 2017. Please find FGV's press release here: <a href="https://www.fgvholdings.com/wpcontent/uploads/2020/03/FGVs-reply-to-Mighty-Earth-Rapid-Response-Report-20-Final.pdf">https://www.fgvholdings.com/wpcontent/uploads/2020/03/FGVs-reply-to-Mighty-Earth-Rapid-Response-Report-20-Final.pdf</a>  | 4. Closed | 20-Dec-21   |

| ID  | Reported Group                           | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance  | Reported By              | Reporting Source  | Investigation Updates & Actions Taken by ADM  | Status       | Last Update |
|-----|--|---|--|---|--------------------------|---|---|--------------|-------------|
| 35  | Samling                                  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation, clearance prep/Stacking line in the following concessions:<br>- Samling Jelalong LPF 0007 (Parts 1 & 3) | Mighty Earth             | Rapid Response Report 15, 18, 19, 20, 23, 25                | ADM adopts a no buy position on the company.  | 3. Suspended | 28-Oct-21   |
| 30  | Samling                                  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- LPF/008 Marudi & Batu Belah   | Mighty Earth             | Rapid Response Report 13, 17, 19, 20, 21, 24, 26,28, 30, 36 | ADM adopts a no buy position on the company.  | 3. Suspended | 28-Oct-21   |
| 193 | Persada Alam Jaya                        | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Persada Alam Jaya - Purchasing FFB grown illegally  | Global Witness           |   | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. Their development programs for PT PAJ included Collaboration For Transformation (CFT), traceability training, and a special traceability program called Ksatria Sawit (collaboration with our partner Koltiva) PT PAJ reported to our direct supplier that it has achieved 89% TTP for the period of Jan-Jun 2020 and is on track to achieve 100% traceability by end 2020. In April, Persada reported that it has achieved 100% TTP. Considering the progress PT PAJ has made, ADM considers this case closed.  | 4. Closed    | 28-Oct-21   |
| 148 | Capitol Group                            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the   | Mighty Earth             | Rapid Response Report 25, 26, 27, 28, 29                    | ADM reached out to direct supplier for investigation. Our direct supplier informed us that HCV/HCS has already been conducted by a qualified assessor, and the company has clarified that their land clearing was guided by the outcome of the assessments. However, some land clearance appears to have occurred inside of HCV/HCS areas due to community pressure to develop a plasma smallholders program. PT MPHS has agreed to rehabilitate the identified areas of land clearing in the recent HCV/HCS reports. PT MPHS is working closely with the Indonesian Watershed Monitoring Agency (BPDAS) and has committed to plant 30,000 trees as part of its rehabilitation program. The HCV/HCS report shall be submitted for peer review and a moratorium on any further land clearing has been in place since Q4 2020. An integrated report submitted to HCV Resource Network: <a href="https://bit.ly/3bj6163">https://bit.ly/3bj6163</a> Management plans for HCV/HCS areas were submitted in the meantime, protecting the areas while preventing similar reoccurrences. Our direct supplier is continuing engagement with and guiding PT MPHS through the peer review process as well as developing a rehabilitation plan. | 4. Closed    | 28-Oct-21   |
| 1   | Anglo-Eastern Plantations                | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Kahayan Agro Plantation  | Mighty Earth             | Rapid Response Report 1, 14, 15, 18, 19, 20, 24,25,27       | ADM reached out to direct supplier for investigation. Our direct supplier informed us that their internal monitoring detected indications of land clearance in KAP concession (4 ha) from May to June 2019. Subsequently, Mighty Earth Rapid Response Report No.18 also mentioned 6 ha land clearing from June 15-July 15 2019 using GLAD Alert coverage. Our direct supplier informed AEP and they answered that they had stopped land clearing activities since the moratorium announcement at the end of May 2019. Our direct supplier checked the exact date of the indication of the land clearing and found AEP's statement was verified. HCSA assessment and peer review has been completed and verified. The HCSA Secretariat and AEP are in the process of discussing further actions. ADM will continue to monitor this process. A moratorium for the disputed area is in place as of May 5, 2020: <a href="https://bit.ly/35OrQ9Q">https://bit.ly/35OrQ9Q</a> PT KAP has sent written confirmation to HCSA about conserving the remaining 150 Ha "disputed HCSA forest" which led HCSA to close the case. The statement can be found here: <a href="https://bit.ly/3kt8sbp">https://bit.ly/3kt8sbp</a>                   | 4. Closed    | 28-Oct-21   |
| 230 | PT Cipta Cakra Murdaya Case 10 in Report | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of NDPE violations in the following concessions:<br>- PT Hardaya Inti Plantation  | Forest Peoples Programme | Demanding accountability                                    | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the case from 2012 was fully settled in 2014 through mediation by regional and provincial governments. PT HIP has clarified that they operate in accordance with all relevant legal permits. The land acquisition process was guided by national legal requirements, where they have provided due compensation for the land. The company has also carried out environmental management and monitoring in accordance with the AMDAL and RPL RKL documents to guide their operational practices. The plantation has also achieved ISPO certification since 2017, reaffirming their sustainability commitments and compliance to the relevant legal framework.  | 4. Closed    | 15-Sep-21   |
| 229 | PT Kurnia Luwuk Sejati                   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of NDPE violations in the following concessions:<br>- PT Kurnia Luwuk Sejati  | Forest Peoples Programme | Demanding accountability                                    | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that in 2010 the community held a demonstration regarding PT KLS' business activities on allegedly illegally owned land. During the demonstration there was destruction of property and machinery by the local community. Therefore, law enforcement and authorities were involved to settle the dispute.   | 4. Closed    | 15-Sep-21   |
| 226 | PT SMART tbk (GAR)                       | PalmOil - Indonesia - Direct                  | Environment - Deforestation & Conversion | Reports of NDPE violations in the following concessions:<br>- PT Kresna Duta Agrindo  | Forest Peoples Programme | Demanding accountability                                    | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that there are no outstanding disputes with the community and KDA. Other issues listed in the report have been addressed and closed. KDA obtains all operational permits necessary, and monitors and audits its environmental impact assessment (AMDAL) requirements every six months. Monthly audits to ensure that requirements set by authorities are complied with are also conducted. Pricing of FFB is conducted using the price of the Indonesian Plantation Department as a reference and open market pricing. Final prices are openly communicated to farmer coops, farmers groups, and agents.  | 4. Closed    | 15-Sep-21   |
| 224 | Bukit Asam                               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:  | Mighty Earth             | Rapid Response Report 35                                    | ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that TP BSP clarified that there was no deforestation taking place as the area was planted with other crops prior converting to palm. Supporting documentation including field verification report and photos have been submitted to prove their claim, where it was found that the vegetation on the ground consists of mixture of other crops, which is mostly rubber and coffee. To ensure that their activities are aligned with the NDPE requirement, the supplier has also agreed to commit to moratorium. Relevant assessments will have to be carried out prior resuming their land clearing to ensure their compliance to NDPE.   | 4. Closed    | 15-Sep-21   |

| ID  | Reported Group  | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance  | Reported By                     | Reporting Source         | Investigation Updates & Actions Taken by ADM  | Status    | Last Update |
|-----|---|---|--|---|---------------------------------|--------------------------|---|-----------|-------------|
| 211 | SIPEF   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:  | Mighty Earth                    | Rapid Response Report 32 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have already been in contact with SIPEF who provided input on the case: <a href="https://bit.ly/3o3gQ06">https://bit.ly/3o3gQ06</a><br>It outlines that SIPEF is within its rights and has undertaken all necessary assessments and precautions. A stand-alone HCS assessment was shared with the HCSA and used as a basis to conduct the land clearing occurred prior to formal HCSA peer review. The HCS assessment can now be seen to have been submitted on the HCSA website. The peer review has been completed, and results are publicly available: <a href="https://bit.ly/3lGld1A">https://bit.ly/3lGld1A</a> | 4. Closed | 15-Sep-21   |
| 222 | Rimbunan Hijau  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- Rimbunan Hijau LPF 0026   | Mighty Earth                    | Rapid Response Report 34 | ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the land clearing is not related to oil palm development.   | 4. Closed | 31-Jul-21   |
| 219 | Rajawali Group/ Eagle High Plantations  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Tandan Sawit Papua   | Mighty Earth                    | Rapid Response Report 34 | ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the land clearing was initiated by leaders of the Yaumumi village. It was intended for expansion of the village, and it was not communicated PT TSP because the village leaders were not aware that the land belongs to PT TSP. Discussion were held with the village leaders and the district government. As a result, the village leadership has agreed to stop clearing activities. PT TSP will put up signs to mark their land area. The verification report can be found here: <a href="https://bit.ly/3vj24W">https://bit.ly/3vj24W</a>   | 4. Closed | 31-Jul-21   |
| 214 | Bukit Barisan Indah Prima   | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute              | Reports of land conflicts involving the subsidiary:<br>- PT Artha Prigel  | Friends of the Earth            | Milieudefensie           | ADM's direct supplier began engaging with Bukit Barisan Indah Prima (BBIP) in Q1 2020. Although PT Artha Prigel holds the legal land rights, conflicts with community members continued. A mediation process was started and included various key stakeholders: Lahat District Government, South Sumatra Provincial Government, the Police Department, the National Land Agency and some relevant government authorities. Due to violent conflicts ensuing, PT AP filed a police report regarding the attack. Discussion are currently ongoing with those involved. As a result of verification assessments, PT AP was able to show evidence of legal rights and mediation process.                                   | 4. Closed | 31-Jul-21   |
| 163 | PT Teupin Lada  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | The company was found to be sourcing from PT Indo Alam, who violates NDPE policies.   | RAN - Rainforest Action Network |                          | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they have met and engaged with PT Teupin Lada on this issues. They agreed to cease sourcing from PT Indo Alam effective immediately. ADM will continue to monitor the supplier. PT TL informed our supplier that they have achieved 100% TTP.  | 4. Closed | 31-Jul-21   |
| 128 | Rimbunan Hijau  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Rimbunan Sawit Sdn Bhd (Simunjan Estate)  | Mighty Earth                    | Rapid Response Report 21 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the encroachment on the land was by local communities. ADM will continue to monitor the case. Our direct supplier informed us that the encroachment on the land was by local communities RH submitted their NDPE policy to our supplier.   | 4. Closed | 31-Jul-21   |
| 111 | PT. Runding Putra Persada   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem   | RAN - Rainforest Action Network |                          | ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. A third-party trader conducted a field visit and confirmed that the FFB was not supplied to PT Runding Putra Persada during the 2018 deforestation period.   | 4. Closed | 31-Jul-21   |
| 108 | PT. Ensew Sawita Lestari  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem   | RAN - Rainforest Action Network |                          | ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. Our direct supplier conducted several field visits, and thorough collaboration with other stakeholders, action plans have been laid out. PT ESL started working on TTP. PT ES informed our direct supplier that they have achieved 100% TTP as of September 2020.  | 4. Closed | 31-Jul-21   |
| 49  | Incasi Raya   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Arvena Sepakat   | Mighty Earth                    | Rapid Response Report 17 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that it was not PT Arvena Sepakat, but the local communities of Kelompok Sinaga who illegally encroached the area. A police report was filed. An investigation was launched, and according to Musimmas, the local community has agreed to stop all activities in the PT Arvena Sepakat concession.  | 4. Closed | 31-Jul-21   |
| 215 | Astra International Tbk   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Agincourt Resources Tbk  | Mighty Earth                    | Rapid Response Report 33 | ADM reached out to its direct suppliers for investigation. Investigations have shown that the allegations against PT Agincourt are related to the mining industry, not the palm oil industry. PT Agincourt is a different company to Astra Agro Lestari. ADM does not source any commodities from the mining industry and therefore has no connection to PT Agincourt.  | 4. Closed | 30-Jun-21   |
| 119 | First Resources   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Ketapang Agro Lestari  | Mighty Earth                    | Rapid Response Report 21 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that a HCS/HCV assessment had been conducted by PT KAL, and the land development was carried out based on the results. After ground verification, it was identified that ~0.6 hectare of land, recommended for conservation, was cleared. This land was rehabilitated once it was identified.   | 4. Closed | 30-Jun-21   |
| 169 | Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd) | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:  | Mighty Earth                    | Rapid Response Report 31 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that PKNP is not a supplier to them based on the group ownership definition of the RSPO: <a href="https://bit.ly/3dRRWim">https://bit.ly/3dRRWim</a><br><a href="https://bit.ly/3knZKd">https://bit.ly/3knZKd</a>   | 4. Closed | 26-Feb-21   |
| 72  | Rimbunan Hijau  | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of peat development and clearance prep/stacking lines in the following concessions:<br>- Erajaya Synergy Sdn Bhd (Lassa division, part of LPF/0029) | Mighty Earth                    | Rapid Response Report 18 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing was mainly conducted by local communities and a small portion for non-palm related operations.  | 4. Closed | 26-Feb-21   |

| ID  | Reported Group  | Supply Chain<br>(Commodity-Country-Relationship) | Grievance Category                         | Description of the Grievance   | Reported By    | Reporting Source         | Investigation Updates & Actions Taken by ADM   | Status    | Last Update |
|-----|---|--|--|--|----------------|--------------------------|--|-----------|-------------|
| 51  | Dharma Satya Nusantara Tbk (DSN)  | PalmOil - Indonesia - Indirect                   | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>- PT Prima Sawit Andalan   | Mighty Earth   | Rapid Response Report 17 | ADM reached out to direct supplier for investigation. The land clearing was not conducted by DSN as they have a moratorium in place since 2015. The land was illegally encroached and cleared by communities from Dusun Tembaga and Desa Sungai Buluh, for the planting of paddy field. DSN has already reported the case to the local authorities and copies of the reports had also been shared with our direct supplier. ADM is monitoring the progress through direct suppliers and public communications. The RSPO has published revised boundaries of PT PSA.  | 4. Closed | 26-Feb-21   |
| 170 | Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd) | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PKPP Plantation Sdn Bhd            | Mighty Earth   | Rapid Response Report 31 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have engaged with PKPP who has committed to cease all clearing. Additionally, two lots of their land will be reserved for potential recovery sites. PKPP is also collaborating with a local university (UITM) on a conservation project in the area covering approximately 40 acres. PKPP as well as LKPP have publicly available NDPE policies and commitments in place.  | 4. Closed | 29-Jan-21   |
| 161 | Amanah Saham Pahang   | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:   | Mighty Earth   | Rapid Response Report 30 | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.   | 4. Closed | 29-Jan-21   |
| 160 | Amanah Saham Pahang   | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:   | Mighty Earth   | Rapid Response Report 30 | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.   | 4. Closed | 29-Jan-21   |
| 159 | Amanah Saham Pahang   | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:   | Mighty Earth   | Rapid Response Report 30 | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.   | 4. Closed | 29-Jan-21   |
| 158 | Instant Star Holdings Sdn Bhd   | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- Aspirasi Kristal (M) Sdn Bhd (area | Mighty Earth   | Rapid Response Report 30 | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that IJM is already engaging with Aspirasi Kristal (AK), who have stopped their land clearing activities in July 2020. We have been informed the land clearing occurred in 2019 and recent activities were related to construction of infrastructure. IJM has in the meantime suspended supply from the FFB supplier AK while investigations are ongoing. Satria Eramaju (SE) has reassured its commitment to NDPE and relevant assessment prior to any land clearing. No land clearing was detected. IJM has also logged this case and will provide updates: <a href="https://www.ijmplantations.com/grievances-compliance-matters.php">https://www.ijmplantations.com/grievances-compliance-matters.php</a>              | 4. Closed | 29-Jan-21   |
| 157 | Instant Star Holdings Sdn Bhd   | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:   | Mighty Earth   | Rapid Response Report 30 | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that IJM is already engaging with Aspirasi Kristal (AK), who have stopped their land clearing activities in July 2020. We have been informed the land clearing occurred in 2019 and recent activities were related to construction of infrastructure. IJM has in the meantime suspended supply from the FFB supplier AK while investigations are ongoing. Satria Eramaju (SE) has reassured its commitment to NDPE and relevant assessment prior to any land clearing. No land clearing was detected. IJM has also logged this case and will provide updates: <a href="https://www.ijmplantations.com/grievances-compliance-matters.php">https://www.ijmplantations.com/grievances-compliance-matters.php</a>              | 4. Closed | 29-Jan-21   |
| 156 | Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd) | PalmOil - Malaysia - Indirect                    | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PKPP Plantation Sdn Bhd            | Mighty Earth   | Rapid Response Report 30 | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they have engaged with PKPP, who has agreed to stop all land clearing at the Sungai Charu concession. Additionally, PKPP management has set aside two land banks located at Lipis, Pahang (426 ha) and Pekan, Pahang (130 ha) for its recovery plan. PKPP as well as LKPP have publicly available NDPE policies and commitments in place.   | 4. Closed | 29-Jan-21   |
| 207 | Wilmar International Ltd  | PalmOil - Indonesia - Direct                     | Human Rights - Land Dispute                | Mustika Sembuluh 2 - Land dispute, waste dumping, indigenous persons affected  | Global Witness |                          | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that:<br>1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority).<br>2. For the allegation of FFB theft and conflict between local community members and Estate security, the case has been closed since settlement was reached by both parties (Company and Dayak Customary Council/Dewan Adat Dayak).<br>3. The company has undergone the customary process in addressing the allegation at Pondok Damar Village. <a href="https://beritakaleng.com/2018/05/14/jalani-sidang-adat-pt-mustika-sembuluh-wajib-bayar-2-311-kati-ramu/">https://beritakaleng.com/2018/05/14/jalani-sidang-adat-pt-mustika-sembuluh-wajib-bayar-2-311-kati-ramu/</a> | 4. Closed | 7-Jan-21    |
| 206 | Wilmar International Ltd  | PalmOil - Indonesia - Direct                     | Human Rights - Land Dispute                | Mustika Sembuluh 1 - Land dispute, waste dumping, indigenous persons affected  | Global Witness |                          | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that:<br>1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority).<br>2. For the allegation of FFB theft and conflict between local community members and Estate security, the case has been closed since settlement was reached by both parties (Company and Dayak Customary Council/Dewan Adat Dayak).   | 4. Closed | 7-Jan-21    |
| 205 | Kharisma Agro Sejahtera   | PalmOil - Indonesia - Indirect                   | Environment - Air, Water, Waste Management | Kharisma Agro Sejahtera - Waste dumping, indigenous persons affected   | Global Witness |                          | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that:<br>1. PT Kharisma Agro Sejahtera (KAS) has clarified that the allegations are untrue.<br>2. PT KAS has submitted evidence of the results of the analysis of river water quality tests for the period June 2017 and December 2017. The sample of Batang Cinaku river water with the Quality Standard used is PP No 82 of 2001 class III concerning Water Quality Management and Water Pollution Control (Laboratory Test results are attached) no parameters exceed the quality standard.<br>3. CSR programme has been carried out by PT KAS which is linked to the building of drilled wells for clean water for local communities in several villages around the factory.   | 4. Closed | 7-Jan-21    |

| ID  | Reported Group               | Supply Chain (Commodity-Country-Relationship) | Grievance Category                         | Description of the Grievance  | Reported By    | Reporting Source | Investigation Updates & Actions Taken by ADM  | Status    | Last Update |
|-----|------------------------------|---|--|---|----------------|------------------|---|-----------|-------------|
| 204 | Kencana Utama Sejati         | PalmOil - Indonesia - Indirect                | Environment - Air, Water, Waste Management | Kencana Utama Sejati - Air pollution                                    | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that this case dates back to 2015 and has been resolved since then. PT Kencana Utama Sejati conducts regular air quality monitoring every six month, which cover:<br>1. Ambient Air Quality<br>2. Quality of smell  | 4. Closed | 7-Jan-21    |
| 203 | Kuala Lumpur Kepong Bhd      | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Jabontara Eka Karsa - Deforestation                                     | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that:<br>1. The previous owner started an oil palm plantation on the eastern section of the estate in 1997. It was later abandoned.<br>2. When KLK took over in 2006, this area was replanted. Subsequently, after a HCV assessment was conducted in 2010 KLK continued to develop the remaining areas of Jabontara estate until 2014.<br>3. The HCV assessment has resulted a total area of about 5,000 ha being demarcated and set aside for conservation, which is approximately 35% of the HGU area.  | 4. Closed | 7-Jan-21    |
| 202 | Wilmar International Ltd     | PalmOil - Indonesia - Direct                  | Human Rights - Land Dispute                | Bumi Sawit Kencana - Land dispute, intimidations, violent confrontation | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that all allegations and disputes have undergone the appropriate legal processes and/or land compensation payments. Intimidations and violent confrontations were not initiated but resolved by PT BSK security officers and a special operations unit of the Indonesian National Police (BRIMOB). Our direct supplier also provided a detailed account of all occurrences and outcomes to Global Witness.  | 4. Closed | 7-Jan-21    |
| 201 | GOLDEN AGRI/ Ivo Mas Tunggal | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Ujung Tanjung - Land grab, indigenous persons affected                  | Global Witness |                  | ADM reached out to its direct supplier for investigation. ADM was informed by its direct supplier that:<br>- The land had been acquired legally by Ivomas Tunggal and this has been explained and clarified to the raiser of the grievance in a meeting facilitated by the local government in Siak on 17/11/17.<br>-The area of 6,505, 42 Ha is entirely within the location permit and the disposal of forest area or HGU PT. Ivomas Tunggal. This is corroborated by Ministry of Forestry Decree No: 036 / Kpts / II / 90 dated January 20, 1990). The company has also provided compensation for the community's land.  | 4. Closed | 7-Dec-20    |
| 200 | SIPEF                        | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Tolan Tiga Indonesia - Land dispute, evictions, criminalisation         | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the articles mention a recent demonstration at the premises of PT Tolan Tiga Indonesia. This was a follow up action by Kelompok Tani Bersatu (KTB) over an old claim which has gone through many years of communications and has long settled in court over 10 years ago. To date there have been at least 3 demonstrations, all coinciding with local political elections. Although the issue has been settled legally, a group of farmers under KTB have brought up this issue and utilized demonstrations as a means to communicate to PT Tolan Tiga Indonesia. It was during the most recent demonstration on 13th – 18th July 2020 that two of the KTB members were reported to the police for causing property damage. Based on the witness, video and photographic evidence provided the police have arrested the suspects. | 4. Closed | 7-Dec-20    |
| 198 | Syaukath Agro                | PalmOil - Indonesia - Indirect                | Environment - Air, Water, Waste Management | Syaukath Agro - Waste dumping   | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the waste-related issue has been resolved. A Liquid Waste Disposal Permit (IPLC) was issued in December 2019.  | 4. Closed | 7-Dec-20    |
| 197 | Surya Utama Nabati           | PalmOil - Indonesia - Indirect                | Environment - Air, Water, Waste Management | Surya Utama Nabati - Waste dumping                                      | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that BLHD (Environmental agency in the area) has conducted an audit, and the BOD and COD levels still meet the quality standard. The distance between the waste pond and the well is more than 500 meters and is also separated by a river.   | 4. Closed | 7-Dec-20    |
| 196 | Sumber Sawit Nusantara       | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Sumber Sawit Nusantara - Land dispute                                   | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that according to SSN, the case is only a public accusation and is not based on valid evidence.The DPRD member (house of representative in the area) has made a visit to the company and was invited to see the conditions directly in the field and it turns out that the allegations are not substantiated.   | 4. Closed | 7-Dec-20    |
| 194 | Raja Marga                   | PalmOil - Indonesia - Indirect                | Environment - Air, Water, Waste Management | Raja Marga - Waste dumping  | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed that a site visit was conducted and a report and an action plan for RM was developed: <a href="https://bit.ly/3nKQ6Bs">https://bit.ly/3nKQ6Bs</a> Our direct supplier has monitoring developments. The waste dumping issue was also verified by our direct supplier. In November 2019, the wastewater did not comply with quality standards, but measures were put in place in order to comply with quality standards again. All documentation and permits are in place.   | 4. Closed | 7-Dec-20    |
| 192 | Parasawita                   | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Parasawita - Land dispute, evictions, criminalization                   | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the news are related to PT Rapala (not Parawasita). The area used to be part of PT Parasawita but has been sold to PT Rapala.  | 4. Closed | 7-Dec-20    |
| 191 | Multiguna Lestari Abadi      | PalmOil - Indonesia - Indirect                | Environment - Air, Water, Waste Management | Multiguna Lestari Abadi - Waste dumping                                 | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that based on the Scofindo Lab test, all quality standards are still in accordance with the standards. However, MLA also realizes that the Reteh River is widely used by people who bathe and are used for drinking water as well, therefore MLA makes land applications to plantations around the factory for liquid waste disposal. MLA has also been checked by the Dinas Lingkungan Provinsi (the Environmental Agency) and the results are clear.  | 4. Closed | 7-Dec-20    |

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|-----|---------------------------------|---|--|---|----------------|------------------|--|-----------|-------------|
| 190 | Minanga Ogan                    | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Minanga Ogan - Land dispute   | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that employee payroll is usually carried out between the 20th to the end of the following month (for payment of the previous month's period). For example, May 2019 wages are paid from June 20 to the end of June with a separate payment according to Employee status in order to facilitate the implementation.<br>Due to the company's financial situation (especially in semester 1 of 2019), the payroll period has been postponed and this has been communicated to the employees.<br>Due to the postponement, a review has been carried out regarding the implementation of the employee's salary by considering the company's financial condition and the employee's needs.   | 4. Closed | 7-Dec-20    |
| 188 | Ja Wattie/ Kintap Jaya Wattindo | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Kintap Jaya Wattindo - Land dispute, criminalisation, deforestation | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the the company has withdrawn from the area and there are local rules and institution set up to protect community rights.   | 4. Closed | 7-Dec-20    |
| 187 | Indomas Mitra Teknik            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Indomas Mitra Teknik - Deforestation                                | Global Witness |                  | A site visit was conducted in 2018, which verified that PT IMT did not source from PT Laot Bangko: <a href="https://bit.ly/3ecJffi">https://bit.ly/3ecJffi</a>   | 4. Closed | 7-Dec-20    |
| 186 | Hutan Alam Lestari              | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Hutan Alam Lestari - Land dispute                                   | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that based on the recommendation from the Forestry Service, it was stated that the PT. HAL is located in the APL area covering 4,690 hectares and in the Production Forest Area covering an area of 1,310 hectares. The part of the land that is included in the Production Forest area is not cultivated.   | 4. Closed | 7-Dec-20    |
| 184 | Citra Sawit Harum               | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Citra Sawit Harum - Land dispute, indigenous persons affected       | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that CSH has committed to its NDPE policy:<br>The status of the Citra Harum Sawit SHM land is APL (non-forest estate land) and there used to be community rubber plants, but the area was controlled by the surrounding village community. Citra Harum Sawit stated that in SHM there had never been any conflicts with indigenous peoples, and there were no indigenous people living in SHM.<br>For the surrounding village community, Citra Harum Sawit also recruits them as employees. Our direct supplier also works with local communities to transport FFB.  | 4. Closed | 7-Dec-20    |
| 183 | Ciptamas Bumi Selaras           | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Ciptamas Bumi Selaras - Land dispute, waste dumping                 | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the Bengkulu Province Horticultural and Plantation Food Crops Office conducted mediation during a meeting on April 4, 2019 which was attended by community representatives from Kulik Sialang Hamlet, PT CBS, Kaur Regency Land Office, POLDA Bengkulu, and the Agriculture Office of Kaur Regency. The results of the meeting are as follows:<br>1. PT CBS participated in the clarification by facilitating land measurement activities for the people of Kulik Sialang Hamlet around the PT CBS concession area, where part of the land belonging to the Dusun Kulik Sialang community that does not overlap with the PT CBS HGU is immediately processed in the application for certificates and land certificates has been published and submitted to the people of Kulik Sialang Hamlet in 2019.<br>2. PT CBS asks the people of Dusun Kulik sialang if there is Terasir land in the PT CBS concession area to be able to show a copy of proof of their land ownership for clarification with proof of land ownership held by PT CBS, so if the Terasir land has never been for sale and purchase to PT CBS, PT CBS will conduct an Enclave process on the land. However, until now PT CBS has not received a copy of the proof of land ownership held by the people of Kulik Sialang Hamlet and continues to wait for the results of the community land measurement process carried out by the Kaur Regency land office.<br>3. Until now, PT CBS periodically provides outreach to the people of Kulik Sialang Hamlet that PT CBS is committed to clamping and not utilizing land and will not clear land in community areas, if anyone is in the HGU area and has never been traded to PT CBS.<br>4. In addition, PT CBS always maintains good communication and relationships with the community in the PT CBS work area, one of which is Kulik Sialang Hamlet, by implementing CSR programs, where one of them is for Kulik Sialang Hamlet, PT CBS also provides assistance.<br>Ciputra Plantation verbally denied any wrongdoing in terms of waste allegations and stated that there had been visited by the Dinas Lingkungan Hidup who did not find any issues. | 4. Closed | 7-Dec-20    |
| 181 | Beurata Subur Persada           | PalmOil - Indonesia - Direct                  | Environment - Air, Water, Waste Management | Beurata Subur Persada - Waste dumping                               | Global Witness |                  | Our direct supplier states that BSP has been engaged with since 2016/2017. A verification visit was conducted in 2017 to follow up on a proposed action plan: <a href="http://bit.ly/2Kpq2tj">http://bit.ly/2Kpq2tj</a> A moratorium and NDPE commitment has been in place since early 2020: <a href="https://bit.ly/2Hr1du">https://bit.ly/2Hr1du</a><br>The overflow occurred due to heavy rain which the embankment (tanggul) could not withstand. The embankment has been raised and built with better materials.  | 4. Closed | 7-Dec-20    |
| 180 | Berkat Sawit Sejahtera          | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Berkat Sawit Sejahtera (Inhil) - Land dispute                       | Global Witness |                  | Research on this case has shown that the main issue raised is that BSS does not know whom to compensate. BSS paid for the land they operate on and are willing to compensate those who should be compensated.  | 4. Closed | 7-Dec-20    |
| 178 | Paramitra Internusa Pratama     | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Belian Mill - Land dispute, deforestation                           | Global Witness |                  | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they notified the Forest Peoples Programme (FPP) and the RSPO of its intention to submit New Planting Procedure (NPP) documents for plasma development in PT Paramitra Internusa Pratama (PT PIP) following public consultations. The RSPO informed our direct supplier that plasma development in PT PIP can proceed. Our direct supplier continues active dialogue with the FPP.  | 4. Closed | 7-Dec-20    |
| 177 | Kencana Persada Nusantara       | PalmOil - Indonesia - Indirect                | Environment and/or Human Rights - Multiple | Arya Rama Prakarsa - Land dispute, deforestation                    | Global Witness |                  | This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.   | 4. Closed | 7-Dec-20    |
| 176 | Archipelago Timur Abadi         | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Archipelago Timur Abadi - Land dispute                              | Global Witness |                  | This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.   | 4. Closed | 7-Dec-20    |

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|-----|-------------------------------------|---|--|---|---------------------------------|---|---|--------------|-------------|
| 175 | Angso Duo Sawit/Mewah               | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Angso Duo Sawit - Land dispute  | Global Witness                  |   | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. The report provided further recommendations to enable PT ADS and its supply chains to implement remedial practices. The corrective actions are intended as an opportunity to work together with ADM's direct supplier to make transformations throughout their supply chain to meet its sustainability policy.   | 4. Closed    | 7-Dec-20    |
| 174 | Agro Wijaya Industri                | PalmOil - Indonesia - Indirect                | Environment - Air, Water, Waste Management | Agro Wijaya Industri - Waste dumping, operating without a permit  | Global Witness                  |   | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the DPRD (a member of the house of people representative in the region) has made an inspection visit to PT AWI together with the Environment Agency in Merangin. From the results of the PT AWI waste sample test, it is within the acceptable limits.   | 4. Closed    | 7-Dec-20    |
| 173 | Adimulia                            | PalmOil - Indonesia - Indirect                | Human Rights - Land Dispute                | Adimulia Agrolestari - Land dispute, watershed violations   | Global Witness                  |   | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they reached out to AA, who confirmed that the watershed is no longer a problem. It has been managed according to applicable protocol. AA is ISPO certified and regularly audited by the ISPO. Therefore, all protocols, especially those related to waste management have been addressed through supervision of the ISPO auditors.  | 4. Closed    | 7-Dec-20    |
| 168 | Sime Darby                          | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | The mill Lavang (SOU 31) seems to be linked to deforestation in the Layang estate concession                      | Actiam                          |   | ADM reached out to its direct supplier for investigation. Our direct supplier informed that their team has checked and confirmed that the clearings detected happened outside of Sime Darby Plantation's Lavang estate boundary. The boundary marked by GFW in blue is not accurate as it overlapped with the boundary of a neighbour (external party) by the name of Warisan Sedar. The clearings detected are in Warisan Sedar's concession. For the estate boundary, you may look up Sime Darby's Layang estate on their Crosscheck 2.0, which is their open source online traceability tool at the below link. In the search box, type in "E.Layang": <a href="https://sd-platinum.maps.arcgis.com/apps/webappviewer/index.html?id=e29b476ae8c64e5e875cdfa8fc0ab731">https://sd-platinum.maps.arcgis.com/apps/webappviewer/index.html?id=e29b476ae8c64e5e875cdfa8fc0ab731</a> | 4. Closed    | 7-Dec-20    |
| 167 | Tradewinds                          | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | The mill Binu Plantations seems to be linked to deforestation in the Binu Plantations Bhd. Sdn.                   | Actiam                          |   | ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they engaged with Tradewinds who clarified that their team conducted ground verification of the area and confirmed that there is no clearing within Binu Plantation. The reported clearing happened outside Binu Plantation's concession which was carried out by external parties/local community.  | 4. Closed    | 7-Dec-20    |
| 138 | Mulia Sawit Agro Lestari (MSAL)     | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation, clearance prep/Stacking line in the following concessions:                              | Mighty Earth                    | Rapid Response Report 22  | ADM adopts a no buy position on the company.  | 3. Suspended | 31-Aug-20   |
| 12  | Mulia Sawit Agro Lestari (MSAL)     | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of peat development, peat forest development, clearance prep/Stacking lines in the following concessions: | Mighty Earth                    | Rapid Response Report 9, 10, 11, 12, 15, 17, 18, 20,22, 23, 24, 25, 27, 28,29 | ADM adopts a no buy position on the company.  | 3. Suspended | 31-Aug-20   |
| 155 | Rimbunan Hijau                      | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:                                | Mighty Earth                    | Rapid Response Report 29  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land is still owned by local smallholders, not by PJP Pelita Lundu Plantation Sdn Bhd. The land clearing was conducted by the local smallholders.  | 4. Closed    | 31-Aug-20   |
| 27  | Wings Group Indonesia               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation in the following concessions:<br>-PT Sentosa Suksesutama                                 | Mighty Earth                    | Rapid Response Report 12  | ADM, its direct supplier, and the Wings Group discussed previous allegations and the progress made by the Wings Group since its suspension by ADM through a video call. ADM was satisfied that its re-entry criteria was met. HCSA assessments and concession/HGU maps were shared.   | 4. Closed    | 31-Aug-20   |
| 110 | PT. Perkebunan Lembah Bakti II      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem   | RAN - Rainforest Action Network |   | PT Perkebunan Lembah Bakti II does not appear in ADM's mill list. However, ADM will continue to monitor high risk mills through a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool.   | 4. Closed    | 31-Jul-20   |
| 99  | Surya Dumai                         | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of clearance prep/stacking lines in the following concessions:<br>- PT Kalimantan Agro Kencana            | Mighty Earth                    | Rapid Response Report 20  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT KAK is not part of Surya Dumai.   | 4. Closed    | 31-Jul-20   |
| 140 | Borneo Pacific Group                | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:                                | Mighty Earth                    | Rapid Response Report 23  | ADM adopts a no buy position on the company.  | 3. Suspended | 29-Jun-20   |
| 151 | Teladan Prima                       | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:                                | Mighty Earth                    | Rapid Response Report 26  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that a third-party carried out an assessment to verify that the deforestation was not committed by PT TBP: <a href="https://bit.ly/2RhfyR">https://bit.ly/2RhfyR</a> The official concession boundary was shared with our direct supplier, who then verified the via overlay map that the alleged deforestation is outside of PT TBP's concession: <a href="https://bit.ly/2V5qqmF">https://bit.ly/2V5qqmF</a>  | 4. Closed    | 29-Jun-20   |
| 149 | Medco                               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Energi Mitra Merauke   | Mighty Earth                    | Rapid Response Report 25  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT EMM is not part of the PT Medco Group and therefore not under their management.   | 4. Closed    | 29-Jun-20   |
| 147 | Gama                                | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Agro Lintas Nusantara  | Mighty Earth                    | Rapid Response Report 17, 18, 24  | PT Agro Lintas Nusantara previously had no identifiable connection to a Group. Upon researching this case, ADM was able to verify that PT ALN does not belong to Gama. Please see the below link: <a href="https://www.wilmar-international.com/wp-content/uploads/2018/09/100818-aide-announcement.pdf">https://www.wilmar-international.com/wp-content/uploads/2018/09/100818-aide-announcement.pdf</a>   | 4. Closed    | 29-Jun-20   |
| 144 | PT Union Sampoerna Triputra Persada | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Reports of deforestation and/or peatland development in the following concessions:                                | Mighty Earth                    | Rapid Response Report 23  | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by the company, and that the concession is outside of their boundary.  | 4. Closed    | 29-Jun-20   |

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|-----|----------------------------------|---|--|--|--------------|--|--|-----------|-------------|
| 143 | NPC Resource Bhd                 | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Sumber Alam Selaras                                 | Mighty Earth | Rapid Response Report 23, 25, 26, 27, 29 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT SAS was affected by fires due to the extreme dry weather conditions in Indonesia. Parts of their current plantations were affected, as well as some conservation areas. Aidenvironment confirms that fires caused this land change, not deforestation. NPC Resources and PT SAS both have no open burning policies and will work on fire prevention methods. They also commit to carry out HCV/HCS assessment, no peat development and FPIC: <a href="https://www.npc.com.my/PublicStatement13Sep2018.pdf">https://www.npc.com.my/PublicStatement13Sep2018.pdf</a> HCV and HCSA reports have been completed and peer reviewed. NPC is drafting an action plan based on findings and recommendations of the assessments.  | 4. Closed | 29-Jun-20   |
| 142 | Incasi Raya                      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:   | Mighty Earth | Rapid Response Report 23                 | ADM reached out to direct supplier. Our direct supplier informed us that the concession does not belong to Incasi Raya. PT MAL is located in Kalimantan Barat while the location of the report is in central Kalimantan.   | 4. Closed | 29-Jun-20   |
| 137 | Kalimantan Sawit Kusama          | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Fajar Saudara Lestari   | Mighty Earth | Rapid Response Report 22                 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT FSL was affected by the long dry season that caused a number of fire spots surrounding the concession. PT FSL has committed to a land clearing moratorium since July 2019. Please see the below links: No Development on HCS/HCV/Peat at group level since July 1, 2019: <a href="http://bit.ly/2EmiwNJ">http://bit.ly/2EmiwNJ</a> Kalimantan Sawit Kusama's official statement can be found here: <a href="http://bit.ly/2rHDI">http://bit.ly/2rHDI</a> Spatial analysis for hotspots and wildfires here: <a href="http://bit.ly/36wRpeM">http://bit.ly/36wRpeM</a>   | 4. Closed | 29-Jun-20   |
| 134 | Goodhope                         | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Rim Capital   | Mighty Earth | Rapid Response Report 22                 | ADM reached out to direct supplier for investigation. Our direct supplier informed us they have been in contact with PT Rim Capital, who takes the allegations very serious. PT Rim Capital confirms that one land clearing is outside of their concession and the other occurred during landfires on community-owned areas. This was found out after a team of village heads and community representatives investigated. Local authorities acknowledged the verification and report stating the company did not commit the fires. PT Rim Capital has a NDPE policy in place since May 2017. Please see the below links: Goodhope's official statement can be found here: <a href="http://bit.ly/2EhArF2">http://bit.ly/2EhArF2</a> The field verification report can be found here: <a href="http://bit.ly/2LQfXym">http://bit.ly/2LQfXym</a> <a href="http://bit.ly/2PA2STW">http://bit.ly/2PA2STW</a> | 4. Closed | 29-Jun-20   |
| 130 | Agro Sarimas Group               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Agro Sarimas Indonesia  | Mighty Earth | Rapid Response Report 22                 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, it was a fire incident, and it happened outside of their concession. Please see the below links: PT ASI's response: <a href="http://bit.ly/2PFatK7">http://bit.ly/2PFatK7</a> Overlay map: <a href="http://bit.ly/2Yck8fE">http://bit.ly/2Yck8fE</a>   | 4. Closed | 29-Jun-20   |
| 127 | Rimbunan Hijau                   | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Timrest Sdn Bhd  | Mighty Earth | Rapid Response Report 21, 27, 28         | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question was not cleared by the company and is outside of Timrest Sdn Bhd's concession boundary.  | 4. Closed | 29-Jun-20   |
| 124 | Teladan                          | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Teladan Palma Perkasa   | Mighty Earth | Rapid Response Report 21                 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to the Teladan Group as their concession permit expired 2 years ago and no activities were ever undertaken.  | 4. Closed | 29-Jun-20   |
| 121 | Golden Plantation Tbk            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation, peat forest development and clearance prep/stacking lines in the following concessions:<br>- PT Mitra Java Agro Palm | Mighty Earth | Rapid Response Report 21                 | ADM reached out to direct supplier for investigation. We were informed that the land clearing spots were located outside PT MJAP concession.   | 4. Closed | 29-Jun-20   |
| 120 | Global Enterprise Sdn Bhd        | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Bulunga Surya Pratama   | Mighty Earth | Rapid Response Report 21, 27             | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Bulunga Surya Pratama's concession boundary.  | 4. Closed | 29-Jun-20   |
| 118 | Dhanistha Surya Nusantara        | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Sabhantara Rawi Sentosa   | Mighty Earth | Rapid Response Report 21, 23, 26, 27     | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Sabhantara Rawi Sentosa's concession boundary.  | 4. Closed | 29-Jun-20   |
| 98  | Felda Global Ventures            | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Citra Niaga Perkasa   | Mighty Earth | Rapid Response Report 20                 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the alleged deforestation area belongs to the local community who did not give consent to FGV for land development even though the land is within FGV's "Izin Lokasi" boundary. It is understood that the land clearing activities started since Jun'19 for paddy planting purpose. Both PT CNP and PT TAA operation in FGV Kalimantan involve only maintenance of road, drains and boundary trenches and water table.  | 4. Closed | 29-Jun-20   |
| 97  | STH Group (Sin Tek Huat)         | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Makmur Bersama Asia   | Mighty Earth | Rapid Response Report 20                 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Makmur Bersama Asia's concession boundary.  | 4. Closed | 29-Jun-20   |
| 96  | IJM Group                        | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Prima Bahagia Permai  | Mighty Earth | Rapid Response Report 20                 | ADM reached out to direct supplier for investigation. Our direct supplier informed us that IJM has confirmed that the land clearing areas are NOT located within the PBP's concession boundary.  | 4. Closed | 29-Jun-20   |
| 95  | Dharma Satya Nusantara Tbk (DSN) | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Putra Utama Lestari (area 2)  | Mighty Earth | Rapid Response Report 20, 23, 27         | ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadastral map. RSPO has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.  | 4. Closed | 29-Jun-20   |
| 94  | Dharma Satya Nusantara Tbk (DSN) | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Putra Utama Lestari (area 1)  | Mighty Earth | Rapid Response Report 20, 23, 27         | ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadastral map. RSPO has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.  | 4. Closed | 29-Jun-20   |

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|----|---|---|--|--|--------------|--|--|-----------|-------------|
| 92 | Sime Darby                                  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Sime Darby Plantation Sdn Bhd                        | Mighty Earth | Rapid Response Report 19                     | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the location of land clearing mentioned by Mighty Earth 19 was just outside Derawan SOU 33 concession.  | 4. Closed | 29-Jun-20   |
| 91 | Rimbunan Hijau                              | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of clearance prep/stacking lines in the following concessions:<br>- RH Plantation (Selangor Estate)      | Mighty Earth | Rapid Response Report 19                     | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing is non-palm related. ADM therefore considers this case closed.   | 4. Closed | 29-Jun-20   |
| 90 | AlamBumi Group                              | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- AlamBumi Sdn Bhd                                     | Mighty Earth | Rapid Response Report 19                     | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to AlamBumi Sdn Bhd.   | 4. Closed | 29-Jun-20   |
| 86 | Samuel International Group                  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of clearance prep/stacking lines in the following concessions:<br>- PT Bina Sarana Sawit Utama           | Mighty Earth | Rapid Response Report 19, 20, 24, 26, 27     | ADM reached out to direct supplier for investigation. Our direct supplier informed us that based on their overlay map, the location of land clearing mentioned by Mighty Earth 19 was located more than 70 km away outside BSSU concession. Please see the below link: <a href="http://bit.ly/2kqcc1m">http://bit.ly/2kqcc1m</a>   | 4. Closed | 29-Jun-20   |
| 85 | Goodhope                                    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Sumber Hasil Prima                                | Mighty Earth | Rapid Response Report 19                     | ADM reached out to direct supplier for investigation. Our direct supplier informed us that both the satellite imagery interpretation and field verification (ground truthing) demonstrate that the land clearing of the particular spots reported in the Mighty Earth Rapid Response 19 were taking place in areas owned by local community located outside the concessions of PT SHP.   | 4. Closed | 29-Jun-20   |
| 84 | Lyman Agro Group                            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Bonti Permai Javaraya                             | Mighty Earth | Rapid Response Report 19                     | ADM reached out to direct supplier for investigation. Our direct supplier informed us that BPJ was not involved in any land clearing and the land clearing mentioned by Mighty Earth 19 was located outside their concession.  | 4. Closed | 29-Jun-20   |
| 77 | Woodman Group                               | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and peat development in the following concessions:<br>- Baram Estate (Part of LPF/0004) | Mighty Earth | Rapid Response Report 18, 21, 27             | We were informed that the concession is not related to palm oil production and the area is not within Woodman's concession.  | 4. Closed | 29-Jun-20   |
| 76 | Tradewinds                                  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of peat forest development in the following concessions:<br>- Trans Kenyalang Sdn Bhd                    | Mighty Earth | Rapid Response Report 18, 19, 26             | ADM reached out to direct supplier for investigation. Our supplier informed us that the location of land clearing mentioned by Mighty Earth 18 was located outside their concession.   | 4. Closed | 29-Jun-20   |
| 73 | Rimbunan Hijau                              | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of peat development in the following concessions:<br>- Woodjaya Sdn Bhd (Lot 197)                        | Mighty Earth | Rapid Response Report 18, 26, 27             | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing was conducted by communities for planting of pineapple.  | 4. Closed | 29-Jun-20   |
| 69 | KLK Bhd (Kuala Lumpur Kepong Bhd)           | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of peat development in the following concessions:<br>- PT Menteng Jaya Sawit Perdana                     | Mighty Earth | Rapid Response Report 18, 19, 21             | KLK Grievance List no.G06 shows that the alleged area is located within PT MJSP's permit area (Izin lokasi). It is however no longer within the management control of PT MJSP, as in Y2016 the area has been gazetted by Kementerian Lingkungan Hidup & Kehutanan ["KLHH"] as Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area.   | 4. Closed | 29-Jun-20   |
| 68 | Golden Plantation Tbk                       | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Airlangga Sawit Jaya                              | Mighty Earth | Rapid Response Report 18                     | We were informed from one supplier that the land clearing location mentioned by Mighty Earth was outside PT ASJ ILOK.  | 4. Closed | 29-Jun-20   |
| 67 | KPN (formerly GAMA)                         | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Sumatera Unggul Makmur                            | Mighty Earth | Rapid Response Report 18,28                  | GAMA Group has changed its name to KPN Plantation. This change came along with a restructured single legal entity for several plantations that are now all group member companies. KPN Plantation has a NDPE Policy in place which now also incorporates PT SUM:<br><a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf</a><br><br>For a list of KPN Plantation Group member companies please see below:<br><a href="http://kpnplantation.com/assets/gama-files/pressrelease/2019_Oct_KPN_-_2nd_Progress_Report_-_01112019.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/2019_Oct_KPN_-_2nd_Progress_Report_-_01112019.pdf</a><br><br>Furthermore, the company has provided a time-bound action plan that puts into operation its NDPE commitments:<br><a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf</a><br><br>ADM considers this case closed, but continues to monitor the progress through direct suppliers and public communications. | 4. Closed | 29-Jun-20   |
| 64 | Asian Agri (RGE)                            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of peat forest development, clearance prep/stacking line in the following                                | Mighty Earth | Rapid Response Report 17, 18, 20, 24, 26, 27 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession. Please see link for details:<br><a href="https://www.apicalgroup.com/sustainability/grievances/asian-agri-2/">https://www.apicalgroup.com/sustainability/grievances/asian-agri-2/</a>  | 4. Closed | 29-Jun-20   |
| 62 | CB Industrial Product Holding/ Jholin Group | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Kurun Sumber Rezeki                               | Mighty Earth | Rapid Response Report 17                     | Our supplier began the engagement process with the company that has a joint venture with CBIP. There is no relationship between the company and PT Kurun Sumer Rezeki. CBIP has no management control over the joint venture companies.  | 4. Closed | 29-Jun-20   |
| 60 | Woodman Group                               | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of peat development in the following concessions:<br>- Liku estate, part of LPF 004                      | Mighty Earth | Rapid Response Report 17,18                  | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.  | 4. Closed | 29-Jun-20   |
| 59 | Woodman Group                               | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of peat development in the following concessions:<br>- Adong estate, part of LPF 004                     | Mighty Earth | Rapid Response Report 17, 18, 21, 27         | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.  | 4. Closed | 29-Jun-20   |
| 58 | WTK   | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Southwind Plantation Sdn Bhd                         | Mighty Earth | Rapid Response Report 17, 19                 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that WTK was not involved in the land clearing. The clearance happened either outside their concession boundary or within "Native Dispute Land" inside their boundary. For clearance within "Native Dispute Land", we are engaging with WTK for more details on the nature of the dispute and the detail boundary of the disputed land.  | 4. Closed | 29-Jun-20   |

| ID | Reported Group                                    | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance  | Reported By  | Reporting Source                         | Investigation Updates & Actions Taken by ADM   | Status    | Last Update |
|----|---|---|--|---|--------------|--|--|-----------|-------------|
| 57 | Rimbunan Hijau                                    | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of peat development, clearance prep/stacking line in the following concessions:<br>-Poh Zhen Sdn Bhd        | Mighty Earth | Rapid Response Report 17, 19, 20, 26, 29 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.  | 4. Closed | 29-Jun-20   |
| 56 | Yuwang/ Empresa (M) Sdn Bhd                       | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Empresa (M) sdn Bhd (OT/0351)                           | Mighty Earth | Rapid Response Report 17, 18             | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.  | 4. Closed | 29-Jun-20   |
| 54 | Boustead Plantation Bhd                           | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of clearance prep/stacking line in the following concessions:<br>-Boustead Pelita Kanowit Snd Bhd           | Mighty Earth | Rapid Response Report 17                 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.  | 4. Closed | 29-Jun-20   |
| 53 | Sumber Tani Agung                                 | PalmOil - Indonesia - Direct                  | Environment - Deforestation & Conversion | Reports of deforestation, clearance prep/stacking lines in the following concessions:<br>- PT Tantahan Panduhuo Asi | Mighty Earth | Rapid Response Report 17                 | Land clearing identified was proved to happen outside the concession   | 4. Closed | 29-Jun-20   |
| 52 | Kirana Megatara                                   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of clearance prep/stacking lines in the following concessions:<br>- PT Putra Katingan Pratama               | Mighty Earth | Rapid Response Report 17                 | Kirana Megatara is not in ADM's supply chain since they are not palm related. Our direct supplier informed us that they reached out to Triputra Agro Persada, who confirmed that Kirana Megatara is not a supplier to them.  | 4. Closed | 29-Jun-20   |
| 48 | Kencana Agri Ltd                                  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Agro Sawit Mas Lestari                               | Mighty Earth | Rapid Response Report 17                 | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.  | 4. Closed | 29-Jun-20   |
| 46 | Genting Plantations Bhd                           | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Sepanjang Intisurya Mulia (649.47 ha)                   | Mongabay     |  | The area identified in the Maphubs report showing deforestation is not in the Sepanjang Intisurya Mulia concession.  | 4. Closed | 29-Jun-20   |
| 45 | Saban Sawit Subur                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Saban Sawit Subur (516.82 ha)                           | Mongabay     |  | According to the investigation of our direct supplier, land clearing is located outside of PT Saban Sawit Subur (SSS)'s areas. The detected land clearing took place inside Saraswanti Agro Estate, and PT SSS has no link to this company, and they are not suppliers to PT SSS. PT SSS is covered under our suppliers's existing monitoring programme and there is no known deforestation alert for PT SSS in 2019.  | 4. Closed | 29-Jun-20   |
| 43 | KL-Kepong Plantation Holdings Sdn Bhd             | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Jabontara Eka Karsa (442.06 ha)                       | Mongabay     |  | After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.   | 4. Closed | 29-Jun-20   |
| 42 | Ketapang Agro Lestari                             | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Ketapang Hijau Lestari (990.7 ha)                     | Mongabay     |  | The company confirmed that they are not sourcing from concessions indicated to be carrying out forest clearing   | 4. Closed | 29-Jun-20   |
| 41 | Ahmad Zaki Resources Berhad (AZRB Group) Malaysia | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Ichtiar Gusti Pudi (425.97 ha)                          | Mongabay     |  | After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.   | 4. Closed | 29-Jun-20   |
| 32 | Global Palm Resources                             | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Prakarsa Tani Sejati                                 | Mighty Earth | Rapid Response Report 14                 | Our direct suppliers confirmed and concluded that the location of land clearing in the Mighty Earth report was not in the concession of PT Prakarsa Tani Sejati ( <a href="http://bit.ly/2v4XRca">http://bit.ly/2v4XRca</a> ). The parent company implemented a NDPE Policy ( <a href="http://www.gprholdings.com/environmental_policy.html">http://www.gprholdings.com/environmental_policy.html</a> ). ADM is monitoring the progress through direct suppliers and public communications.  | 4. Closed | 29-Jun-20   |
| 28 | Jaya Tiasa Holding Berhad (Rimbunan Hijau Group)  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-LPF/0024   | Mighty Earth | Rapid Response Report 12                 | Rimbunan Hijau is in our supply chain indirectly and our trading partners have similar NDPE policies as ours. Please note the reported case in Report #12 on Haya Tiasa Holding Berhad (Rimbunan Hijau group) LPF /0024 concerns Licensed Planted Forests which are designated for timber plantation such as acacia and not related to palm oil. ADM therefore considers this case closed.   | 4. Closed | 29-Jun-20   |
| 17 | Samuel International Group                        | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Prasetya Mitra Muda Blok II                           | Mighty Earth | Rapid Response Report 6                  | Our supplier began an engagement process with parent company. According to this, Samuel Group has signed a letter of commitment in complying with the NDPE policy and currently exploring options for various assessment. In the meantime, our supplier continue to monitor PT Prasetya Mitra Muda Blok II's activities on monthly basis.  | 4. Closed | 29-Jun-20   |
| 9  | Gama  | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Agriprima Cipta Persada                               | Mighty Earth | Rapid Response Report 3, 4               | Gama has changed its name to KPN Plantation. Therefore, the below mentioned information was retrieved from their new website. KPN Plantation has a NDPE Policy in place:<br><a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf</a><br><br>Furthermore, the company has provided a time-bound action plan that puts into operation its NDPE commitments:<br><a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf</a><br><br>Gama has worked with Aidenvironment and set up a Time Bound Plan. ADM considers this case close but continues to monitor the progress through direct suppliers and public communications. | 4. Closed | 29-Jun-20   |
| 8  | KPN (formerly GAMA)                               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-PT Agrinusa Persada Mulia                                | Mighty Earth | Rapid Response Report 3, 20              | Gama has changed its name to KPN Plantation. The area in question are outside PT Agrinusa Persada Mulia's HGU concession area. The land clearing was carried out by communities for farming; and by PT. BPUP (Bangun Bina Utama Papua) for road construction. Please find documentation below: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf</a>   | 4. Closed | 29-Jun-20   |

| ID  | Reported Group                          | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance   | Reported By  | Reporting Source   | Investigation Updates & Actions Taken by ADM   | Status       | Last Update |
|-----|---|---|--|--|--------------|--|--|--------------|-------------|
| 4   | BLD Plantation                          | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of peat forest in the following concessions:<br>-BLD Plantation  | Mighty Earth | Rapid Response Report 4, 5, 6, 7, 11                                   | BLDP has been working with Earthworm Foundation (EF) and has published their Sustainable Palm Oil Policy with NDPE commitments in May 2019 ( <a href="http://www.blpdb.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf">http://www.blpdb.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf</a> )<br>EF is the advisory consultant and is supporting BLD in the crafting of a road map for the delivery and implementation of this policy and a grievance mechanism/procedure to address issues from both internal and external stakeholders. BLD has announced a moratorium on all future new development until the finalization of their policy implementation plan. And there will be no development of peatlands regardless of depth and HCS and HCV assessment will be conducted for all future developments. ADM considers this case closed but continues to monitor the progress through direct suppliers and public communications. | 4. Closed    | 29-Jun-20   |
| 126 | BBC Holdings Sdn Bhd                    | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Alambumi Plantation Sdn Bhd                                    | Mighty Earth | Rapid Response Report 21, 26, 27                                       | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 104 | Shin Yang                               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Linau Sinar Sdn Bhd  | Mighty Earth | Rapid Response Report 13, 20, 21, 27                                   | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 103 | CB Industrial Product Holding           | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Java Jadi Utama   | Mighty Earth | Rapid Response Report 15, 20, 23, 26, 27                               | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 79  | Samling                                 | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- LPF/0007 Samling Jelalong (OP)                                 | Mighty Earth | Rapid Response Report 14, 15, 16, 19, 20, 21, 23,24, 25, 26, 27        | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 78  | Samling                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- LPF/0006 Samling Lana  | Mighty Earth | Rapid Response Report 15, 16, 18, 19, 20, 23, 25, 27                   | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 74  | Shin Yang/Sarawak Oil Palms Bhd         | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Shin Yang OP Planting Area                                     | Mighty Earth | Rapid Response Report 18, 19, 20, 21, 25, 27                           | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 71  | Samling                                 | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Tunas Borneo Plantations                                    | Mighty Earth | Rapid Response Report 18, 27, 28, 29                                   | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 55  | Shin Yang                               | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- Dataran Linau OP (SY) (Lot 1 Block | Mighty Earth | Rapid Response Report 17, 18, 19, 20, 21, 23, 25, 27                   | ADM adopts a no buy position on the company.   | 3. Suspended | 3-Jun-20    |
| 66  | Unknown Group                           | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Dataran Linau OP (SY) (Lot 1 Block                             | Mighty Earth | Rapid Response Report 16, 17, 20, 22, 27, 29                           | ADM reached out to direct supplier for investigation. Our direct supplier informed us that Bakrie management confirmed that MML is no longer part of Bakrie Group since Nov 9 2017. MML is no longer mentioned in the list of subsidiaries in Bakrie Sumatera Plantation's 2018 Annual Report. After reviewing our internal control system, we found that there is no connection with the mill/concession identified in the report. Therefore, this case is not related to ADM and considered closed.  | 4. Closed    | 3-Jun-20    |
| 50  | Makin                                   | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of peat forest development in the following concessions:<br>-PT Mekar Karya Kahuripan                              | Mighty Earth | Rapid Response Report 17, 18, 19, 20, 21, 23, 25, 27                   | ADM reached out to direct supplier for investigation. Our direct suppliers informed that Makin stated that PT Mekar Karya Kahuripan's business activity has been ceased/frozen since 15th September 2016. Through our direct supplier's ongoing engagement with PT MKK, proof was provided to ME in the form of Notary Acts. Therefore, this case is classified as closed.   | 4. Closed    | 3-Jun-20    |
| 25  | Shin Yang                               | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>-LPF/0039 Zedtee SB  | Mighty Earth | Rapid Response Report 4  | ADM adopts a no buy position on the company.   | 3. Suspended | 20-May-20   |
| 80  | Salim/IndoGunta                         | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Rimbun Sawit Papua  | Mighty Earth | Rapid Response Report 3, 10, 13, 14, 16, 17, 18, 20,23, 25, 26, 28, 29 | ADM adopts a no buy position on the company.   | 3. Suspended | 20-Mar-20   |
| 101 | Shin Yang/Sarawak Oil Palms Bhd         | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Dataran Seping Sdn Bhd (Adam Oil Palm Estate)                  | Mighty Earth | Rapid Response Report 20, 21   | ADM adopts a no buy position on the company.   | 3. Suspended | 21-Jan-20   |
| 38  | Shin Yang Group / Sarawak Oil Palms Bhd | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of clearance prep/Stacking line in the following concessions:<br>- Shin Yang LPF 0018                              | Mighty Earth | Rapid Response Report 15, 29   | ADM adopts a no buy position on the company.   | 3. Suspended | 21-Jan-20   |
| 146 | Bukit Berlian Plantation Group          | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation and/or peatland development in the following concessions:<br>- PT Ginang Fohu Plantation          | Mighty Earth | Rapid Response Report 17, 23, 28, 29                                   | ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by PT GFP but by the communities. Bukit Berlian Plantation Group have adopted an NDPE policy as can be seen on their website: <a href="http://www.bukitberlian.com/Sustainability-Policy.html">www.bukitberlian.com/Sustainability-Policy.html</a>  | 4. Closed    | 21-Jan-20   |
| 65  | Samling                                 | PalmOil - Malaysia - Indirect                 | Environment - Deforestation & Conversion | Reports of peat development in the following concessions:<br>-PT Svarikat Samling Timber Sdn                               | Mighty Earth | Rapid Response Report 17, 19, 20                                       | ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation/planting are not related to palm oil production.  | 3. Suspended | 30-Nov-19   |

| ID | Reported Group     | Supply Chain (Commodity-Country-Relationship) | Grievance Category                       | Description of the Grievance   | Reported By  | Reporting Source                       | Investigation Updates & Actions Taken by ADM | Status       | Last Update |
|----|--------------------|---|--|--|--------------|--|--|--------------|-------------|
| 5  | Kencana Group      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation, peat development, peat forest development, clearance prep/ Stracking lines in the following concessions:<br>- PT Kanuasindo Palm Industr | Mighty Earth | Rapid Response Report 5, 6, 12, 17, 20 | ADM adopts a no buy position on the company. | 3. Suspended | 30-Nov-19   |
| 89 | Kencana Group      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Sentrakarya Manunggal   | Mighty Earth | Rapid Response Report 19               | ADM adopts a no buy position on the company. | 3. Suspended | 23-Sep-19   |
| 83 | Tunas Baru Lampung | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Alleged clearance of forested peatlands.   | Greenpeace   | Chain Reaction Research                | ADM adopts a no buy position on the company. | 3. Suspended | 26-Aug-19   |
| 63 | Kencana Group      | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- PT Anugerah Makmur Sejati  | Mighty Earth | Rapid Response Report 17               | ADM adopts a no buy position on the company. | 3. Suspended | 15-Aug-19   |
| 14 | Pundi              | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of peat forest development, clearance prep/stacking lines in the following concessions:  | Mighty Earth | Rapid Response Report 10, 11, 12, 18   | ADM adopts a no buy position on the company. | 3. Suspended | 13-Jul-19   |
| 44 | Pundi              | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion | Reports of deforestation in the following concessions:<br>- Pundi Lahan Khatulistiwa (480.49 ha)   | Mongabay     |  | ADM adopts a no buy position on the company. | 3. Suspended | 10-Jul-19   |



## Appendix

List of ineligible grievances (grievances not linked to ADM supply chain).

| ID    | Reported Group | Supply Chain (Commodity-Country-Relationship) | Grievance Category                         | Description of the Grievance  | Reported By     | Reporting Source  | Investigation Updates & Actions Taken by ADM  | Status    | Last Update |
|-------|----------------|---|--|---|-----------------|---|---|-----------|-------------|
| NR 15 | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegations of peatland development in the PT Borneo Sawit Gemilang   | Mighty Earth    | Rapid Response report 53  | 02-Dec-2025: The clearing is classified as community clearing, not company-driven.  | 4. Closed | 2-Dec-25    |
| NR 14 | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegations of peatland development in the PT Sepalar Yasa Kartika, PT Wira Usahatama Lestari, PT Antang Sawit Perkasa concession between January 2023 and September 2025 | Mighty Earth    | Rapid Response report 53  | 02-Dec-2025: Multi-imagery visual assessments, including water, soil, and vegetation analyses, indicate that the areas previously classified as "peat" are, in fact, mineral soils, seasonal wetlands, or kerangas ecosystems.  | 4. Closed | 2-Dec-25    |
| NR 13 | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation against Rinwood Group, at the Rich Venture Plantation Sdn Bhd concession  | Mighty Earth    | Rapid Response report 52  | 03-Nov-2025: ADM has no direct link to this group. We have reviewed the allegations with support from our 3rd party and found that:<br>- The area under LPF/0056 is licensed as a mixed forest plantation (bamboo and timber), not an oil palm concession.<br>- The activities observed were selective logging and land preparation consistent with the forestry permit.<br>- No evidence of oil palm conversion or palm oil supply chain connection was identified   | 4. Closed | 3-Nov-25    |
| NR 12 | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation against PT Kalimantan Agro Pusaka (Djohan Brothers)   | Mighty Earth    | Rapid Response report 50  | 23-Sep-2025: The alert location is outside their HGU (cultivation permit) boundary.   | 4. Closed | 23-Sep-25   |
| NR 11 | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation against PT Cemaru Lestari (Global Palm Resources Group)   | Mighty Earth    | Rapid Response report 50  | 23-Sep-2025: The clearing was conducted by local communities and not on peatland.   | 4. Closed | 23-Sep-25   |
| NR 10 | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation against PT Sintang Agro Mandiri (Prima Lestari Investama)   | Mighty Earth    | Rapid Response report 50  | 23-Sep-2025: The clearing was in 2012 and conducted by local communities.   | 4. Closed | 23-Sep-25   |
| NR 9  | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation against PT Lahana Agro Inti Ketapang (Meadows Capital Ltd)  | Mighty Earth    | Rapid Response report 50  | 23-Sep-2025: Both mills, Mitra Abadimas Sejahtera (MAS) and Fajar Saudara Kusuma (Sebawi), have ceased sourcing from PT LAIK since 12 Sept 2023 and 19 June 2023, respectively.   | 4. Closed | 23-Sep-25   |
| NR 8  | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation against PT Munte Waniq Jaya Perkasa (TSH Resource)  | Mighty Earth    | Rapid Response report 50  | 23-Sep-2025: The issue stems from community encroachment due to unclear village boundaries between two villages, Kampung Ponaq and Kampung Muara Tae. Years ago, the land in question had already been compensated to Kampung Ponaq. However, Kampung Muara Tae later laid claim to the same land, leading to disputes and encroachment into the area.  | 4. Closed | 23-Sep-25   |
| NR 7  | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation against PT Jalin Vaneo (Pasifik Agro Sentosa)   | Mighty Earth    | Rapid Response report 50  | 23-Sep-2025: The land clearing occurred in 2016, and based on the HCV/HCS assessment, the area was determined to be neither a High Conservation Value (HCV) area nor a forested area. The Ministry of Environment and Forestry (KLHK) conducted a field verification and confirmed that the site is not classified as peatland. This finding was further corroborated by the Directorate General for Environmental Pollution and Degradation Control (Ditjen PPKL) during their verification in October 2024. | 4. Closed | 23-Sep-25   |
| NR 6  | ADM            | Cotton - China - Indirect                     | Human Rights - Working Conditions          | Allegation linking ADM to Yihai Kerry over sourcing cottonseed products tied to human rights violations in China  | Pulitzer Center | <a href="https://pulitzercenter.org/stories/world-sanctioned-xinjiang-cotton-china-turned-it-chicken-feed">https://pulitzercenter.org/stories/world-sanctioned-xinjiang-cotton-china-turned-it-chicken-feed</a> | 19-Sep-2025: Following a thorough assessment of its global supply chains, ADM found no evidence of sourcing cottonseed products for animal nutrition processing from Yihai Kerry.   | 4. Closed | 19-Sep-25   |
| NR 5  | ADM            | PalmOil - Guatemala - Indirect                | Environment and/or Human Rights - Multiple | Allegation of sourcing palm product from Chiquibul Company  | Anonymous       | Anonymous   | 07-Apr-2025: Grievance raiser submitted a request for clarification of ADM palm oil supply chain. ADM Hamburg is not linked to Industria Chiquibul for the palm supply chain: Indeed, ADM is not processing palm oil in the facility ADM Hamburg.   | 4. Closed | 7-Apr-25    |
| NR 4  | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Allegation of deforestation for PT Borneo International Anugerah, PT Arjuna Utama Sawit, PT Equator Sumber Rezeki   | Mighty Earth    | Rapid Response report 49  | 07-Apr-2025: Mighty Earth suspected ADM to be linked to First Borneo Group. ADM already adopts a no-buy position of First Borneo Group and companies owned by Mr. Alexander Thalsim. ADM is not connected to those mills.   | 4. Closed | 7-Apr-25    |
| NR 3  | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Report of deforestation in Riau and Central Kalimantan  | Flora           |   | 10-Jan-2025: ADM's in-depth investigations, supported by accurate satellite monitoring, indicated that land clearing activities were conducted outside of the concessions linked to ADM supply chain.   | 4. Closed | 10-Jan-25   |
| NR 2  | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Report of deforestation in PT SSN and PT RPP  | Grupo Bimbo     | Rainforest Action Network - Ourangutan Capital  | 10-Jan-2025: PT SSN and PT RPP are not mentioned by latest published version of Rainforest Action Network - Orangutan Capital. PT RPP is on track, following the resolution plan that was defined 2 years ago as RAN published its first version of the Orangutan Capital report.   | 4. Closed | 10-Jan-25   |
| NR 1  | ADM            | PalmOil - Indonesia - Indirect                | Environment - Deforestation & Conversion   | Report of deforestation in PT Multi Sarana Agro Mandiri (PT MSAM) concession on the island of Laut, East Kalimantan   | Mighty Earth    | Rapid Response report 47  | 10-Jan-2025: ADM company does not have any links to the Jhonlin Group   | 4. Closed | 10-Jan-25   |

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| 271 | ADM  | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of fire events for soy and cattle   | Aid Environment | Realtime Deforestation Monitoring- soy and cattle supply chains #7 | 21-Nov-24: We conducted an analysis and concluded there was no soy planted in the area. Recent images show the area is being naturally restored.<br>Nov-2022: ADM received the Realtime Deforestation Monitoring- soy and cattle supply chains #7.   | 4. Closed | 21-Nov-24   |
| 267 | Brazil - Twelve properties as listed in the report in municipalities of Bahia and Mato Grosso  | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 1                             | 07-Nov-24: After years of close monitoring the reported properties, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>13-Jul-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 266 | Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso                             | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 3                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>12-Aug-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 265 | Brazil - Fourteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Roraima               | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 2                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>12-Aug-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 264 | Brazil - Twelve properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Pará                    | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 4                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>18-Sep-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 263 | Brazil - Sixteen properties as listed in the report in the municipalities of Piauí, Bahia, Goiás, Maranhão, Tocantins, Pará, and Mato Grosso | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 5                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>23-Sep-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 262 | Brazil - Twelve properties as listed in the report in the municipalities of Acre, Bahia, Mato Grosso, and Pará                               | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 6                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>30-Nov-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 261 | Brazil - Twelve properties as listed in the report in the municipalities of Bahia, Mato Grosso, Goiás, and Pará                              | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 7                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>21-Jan-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 260 | Brazil - Ten properties as listed in the report in the municipality of Mato Grosso   | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 10                            | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>27-Apr-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 259 | Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Tocantins                                  | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 9                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>27-Apr-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |
| 258 | Brazil - Fourteen properties as listed in the report in the municipalities of Amazonas and Bahia   | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle | Mighty Earth    | Rapid Response Soy and Cattle Report 8                             | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>27-Apr-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.      | 4. Closed | 7-Nov-24    |

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|-----|--|---|--|---|--------------|---|---|-----------|-------------|
| 257 | Paraguay - Twelve properties as listed in the report in the municipalities of Boquerón, Alto Parana                  | Soybean - Paraguay - Direct                   | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 15 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 256 | Brazil - Thirteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão and Mato Grosso | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 11 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 254 | Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão and Mato Grosso      | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 12 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 253 | Brazil - Eleven properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso  | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 13 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 252 | Brazil - Ten properties as listed in the report in the state of Mato Grosso  | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 16 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>06-Nov-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 251 | Brazil - Eleven properties as listed in the report in the municipalities of Bahia, Pará, Maranhão, and Mato Grosso   | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 14 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>06-Nov-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 250 | Brazil - Seven properties as listed in the report in the states of Mato Grosso, Pará, and Tocantins                  | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 17 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>07-Jan-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 249 | Brazil - Ten properties as listed in the report in the municipalities of Piauí, Maranhão, Mato Grosso and Pará       | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 19 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>26-Feb-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 248 | Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará               | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 21 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>31-Mar-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 247 | Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará               | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                               | Mighty Earth | Rapid Response Soy and Cattle Report 20 | 07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies.<br>31-Mar-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy. | 4. Closed | 7-Nov-24    |
| 296 | ADM  | Soybean - Brazil - Direct                     | Environment - Deforestation & Conversion | Report of deforestation related to soy supply chain in Maranhao and Bahia | Mighty Earth | Rapid Response                          | In August 2024, ADM received the Rapid Response Soy Report including two case studies linking deforestation and natural ecosystem conversion in the Brazilian Amazon and Cerrado biomes.<br>The investigation concluded that none of the deforestation cases presented in the report is linked to soy ADM has sourced, or in breach of ADM' policies.   | 4. Closed | 10-Sep-24   |

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|-----|--------------------------|--|--|---|-------------------|---|---|-----------|-------------|
| 287 | Wilmar International Ltd | N/A - China - Other                              | Human Rights - Working Conditions        | Allegation pertaining to ADM's ownership interest in Wilmar                 | Hunterbrook Media |   | Hunterbrook Media published a report on May 29, within two hours after their first inquiry from Hunterbrook Selected Research, alleging that Wilmar facilities in Xingjiang may be non-compliant with its policies due to "extensive state-sponsored forced labor policies". No information or evidence was provided other than location of facilities in Xingjiang. No sourcing from these facilities was attributed to ADM. Both companies are committed to compliance with local laws and regulations protecting workers' rights. In addition, each company has its own human rights policy that explicitly states forced labor is not allowed in their operations or supply chains, with the policies applying both to the companies and their business affiliates. ADM has reached out to Wilmar for additional information regarding due diligence related to the facilities. | 4. Closed | 8-Jul-24    |
| 291 | ADM                      | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of land clearing related to soy                                     | Mighty Earth      | Rapid Repose - Soy Report   | ADM received a notice from Mighty Earth in February 2024, as a part of their Rapid Repose - Soy Report, that a farm located in Mato Grosso State and within 50km of an ADM grain silo had allegedly cleared land and native vegetation in 2023. After investigating, it was determined that this farm does not supply to ADM and the owner was not found to have been a supplier to ADM from any other farms.   | 4. Closed | 26-Feb-24   |
| 274 | ADM                      | Soybean - Brazil - Direct                        | Environment - Deforestation & Conversion | Reports of fire events for and land clearing soy and cattle                 | Aid Environment   | Realtime Deforestation Monitoring- soy and cattle supply chains #12 | No direct connection between soy sourced by ADM and the areas of deforestation identified in this report. <a href="https://www.fgvholdings.com/wp-content/uploads/2020/03/Background-and-Summary-of-FGV-Action-Plan-2020.pdf">https://www.fgvholdings.com/wp-content/uploads/2020/03/Background-and-Summary-of-FGV-Action-Plan-2020.pdf</a>   | 4. Closed | 18-May-23   |
| 270 | ADM                      | Soybean - Brazil - Indirect                      | Environment - Deforestation & Conversion | Reports of land clearing for soy and cattle                                 | Aid Environment   | Realtime Deforestation Monitoring- soy and cattle supply chains #3  | In June, 2022, ADM received the Realtime Deforestation Monitoring- soy and cattle supply chains #3. ADM did not source soy from any of the farms listed on the report RDM #3 in the crop 2021/2022. The analyses were made by remote sensing and consultation of our grain purchase systems.  | 4. Closed | 24-Jun-22   |
| 244 | ADM                      | Soybean - Brazil - Indirect                      | Environment - Deforestation & Conversion | Realtime Deforestation Monitoring- soy and cattle supply chains #3          | Aid Environment   |   | ADM did not source soy from any of the farms listed on the report RDM #3 in the crop year 2021/2022. The analyses were made by remote sensing and consultation of our grain purchase systems.   | 4. Closed | 24-Jun-22   |
| 166 | Not Applicable           | N/A - China - Indirect                           | Human Rights - Working Conditions        | Reports of Human Rights Violations in the Xinjiang Uyghur Autonomous Region | Bell              |   | ADM investigated any possible links to sourcing from the region in question. There are no direct links, and no identifiable indirect links. The vast majority of ADM's indirect purchasing process in the APAC region contains a compliance clause/human right clauses. ADM is currently in process of publishing standard indirect purchasing terms and conditions for the APAC region containing a human rights clause.   | 4. Closed | 7-Dec-20    |