

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Astra Agro Lestari	Reports of land disputes and resistance by local citizens in the following concessions: - PT Mamuang (Passang Kayu) - PT Lestari Tani Telada (PT LTT) - PT Agro Nusa Abadi (PT ANA)	Walhi	Indirect with parent company via third party suppliers/traders.	Our direct supplier has engaged with Astra Agro Lestari on all listed cases. PT Mamuang - a field inspection was carried out by the National Land Agency (BPN), which showed that the land belongs to PT Mamuang. The company was proven to be within its rights by the district and higher court. Legal authorities and courts had to be engaged on certain aspects of this case. An agreement with other citizens was reached. PT Mamuang holds a positive relationship with the local community. PT LTT - 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. 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. 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&G is also providing our direct supplier with information of the progress update, including PT AAL's engagement with the Conflict Resolution Unit to evaluate their current practices in relation to human rights: https://bit.ly/3xtRXTk	Monitoring	13-Apr-22
Brazil - Eighteen properties listed in the tracker report in the municipalities of Bahia and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Tracker Report	No direct connection between soy sourced by ADM and areas of deforestation.	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 on one of his conversion licenses, and are still awaiting for further information from one supplier. Investigation will remain open until we have all documents.	Under investigation	04-Apr-22
Jernih Kemboja	Reports of deforestation and/or peatland development in the following concession: - PT D 1815	Mighty Earth Rapid Response Report 38	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation.	Under Investigation	04-Mar-22
Dewa Rencana Perangin Angin	Reports of NDPE violations in the following concessions: - Dewa Rencana Perangin Angin	Mongabay	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	04-Mar-22
Incasi Raya	Reports of NDPE violations in the following concessions: - Sumbar Andalas Kencana	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara	Indirect with parent company via third party suppliers/traders.	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	Closed	04-Mar-22
PT Tasma Puja	Reports of NDPE violations in the following concessions: - Batang Cenaku	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on the allegations: 1) Our direct supplier has verified that PT TP had obtained all mandatory legal permits (ILOK in 2006; IUP in 2007) long before the alleged area was designated as a forest area by the Government of Indonesia in 2014 and 2016. When the legal permits were issued, the land did not overlap with a designated forest area. The government revisited and addressed these legacy issues in Undang-Undang Cipta Kerja in late 2020, giving 3 years for the companies with such legacy issues to fulfill the requirements in accordance with the regulations of law in the forestry sector. To address the current overlap issue, PT TP submitted a proposal for a forest release permit to the Ministry of the Environment and Forestry of Indonesia and also to the provincial government of Riau. 2) Suspected of accommodating, purchasing, processing, selling, and marketing oil palm products from illegally-grown plantations in Bukit Betabuh protected forest in Indragiri Hulu Regency - PT TP has stated that a survey to the farm is always carried out as a due diligence against each of their new FFB suppliers to check the FFB quality and make sure that the farm is not located in forest zone. The photos show a truck delivering CPO/Oil to a refinery, not FFB's from the farm inside Bukit Betabuh National Park to the mill. Further supporting evidence is being sought as the basis for continued investigation and engagement with PT TP. Our direct supplier has registered PT Tasma Puja's Batang Cenaku mill in one of their programs to help them achieve 100% traceability by the end of 2022 as they currently have TTP of roughly 90%. 3) PT TP explained that the land dispute with the community only involved a few groups who refused to become plasma members. The dispute is therefore an internal KUD/Cooperative Management issue. Now there is an agreement on the realization for an area of 378 ha as plasma land with a profit-sharing percentage of 17.5% for plasma members. The realization of this agreement will begin in 2022. This agreement has also received support from the Commission II Chairman of the Indragiri Hulu House of Representative (DPRD) who carried out a field visit regarding this issue in 2020. PT TP will update our direct supplier with the report on the realization of the 378 Ha plasma land agreement with a 17.5% profit sharing scheme by the end of 2022	Monitoring	28-Jan-22
Bumitama Group	Reports of deforestation and/or peatland development in the following concessions: - PT Andalan Sukses Makmur	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that these land changes were caused 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: http://bitly.ws/obwh Bumitama's further clarification on the land verification: http://bit.ly/BumitamaClarificationToGAR	Closed	28-Jan-22
Sampoerna Agro	Reports of deforestation in the following concessions: - PT Usaha Agro Indonesia	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	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.	Closed	28-Jan-22

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Eagle High Plantations Tbk	Reports of deforestation in the following concessions: - PT Arrtu Energie Resources	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	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 intention 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: https://bit.ly/2L4NYqi An update on the PT AER Action Plan can be found here: https://bit.ly/3IPCncV	Closed	28-Jan-22
Bumitama Group	Reports of deforestation in the following concessions: - PT Damai Agro Sejahtera	Mighty Earth Rapid Response Report 22, 23, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT DAS patrols 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: http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7dcfe985a 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: https://bit.ly/3cVs01U	Closed	28-Jan-22
TSH Resources Bhd	Reports of deforestation in the following concessions: - PT Bulungan Citra Agro Persada	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	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.	Closed	28-Jan-22
Makin	Reports of deforestation in the following concessions: - PT Cipta Karsa Kahuripan	Mighty Earth Rapid Response Report 21, 22	Indirect with parent company via third party suppliers/traders.	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 had not performed any activity on the land. A notarized letter showing the company had ceased operations in 2016 was provided.	Closed	28-Jan-22
Genting Plantations Bhd	Reports of deforestation in the following concessions: - PT Permata Sawit Mandiri	Mighty Earth Rapid Response Report 15, 17, 19, 20, 23	Indirect with parent company via third party suppliers/traders.	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: http://bit.ly/2wMjoaH	Closed	28-Jan-22
TH Plantations Bhd	Reports of deforestation in the following concessions: - Ladang Tabung Haji	Mighty Earth Rapid Response Report 15, 18, 20	Indirect with parent company via third party suppliers/traders.	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.	Closed	28-Jan-22

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Perkebunan Nusantara	Reports of deforestation in the following concessions: - PT Perkebunan Nusantara II Prafi	Mighty Earth Rapid Response Report 15	Indirect with parent company via third party suppliers/traders.	Our direct supplier informed us that PT Perkebunan Nusantara has divested the concession in question since 2014.	Closed	28-Jan-22
Group of SOY farmers/growers in Correntina, Bahia (BRAZIL)	Reports of alleged land tenure issues/social conflicts between traditional local communities and SOY farmers in Correntina, Bahia (Brazil)	Global Witness (London, UK)	Direct SOY growers/suppliers	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. 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 (https://bit.ly/32k8M5E) 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 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: a) HCV Report of PT Harisa Agro Lestari (https://bit.ly/3EcXZMP) that has obtained satisfactory status (note: the area was part of PT Harisa Agro Lestari, which PT MPG officially acquired on 1st April 2018); b) HCS Report of PT Multipersada Gatramegah in 2018 that has covered the area in question (https://bit.ly/3qa10Uk) which has completed HCSA review process (https://bit.ly/3pe7PVS); c) This area has also undergone the RSPO NPP process (https://bit.ly/3spPEyf). All reports are published and available on HCVRN, HCSA, and RSPO websites, respectively.	Under investigation	12-Jan-22
Dharma Satya Nusantara Tbk (DSN)	Reports of deforestation and/or peatland development in the following concession: - PT Kencana Alam Permai	Mighty Earth Rapid Response Report 37	Indirect with parent company via third party suppliers/traders.	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 (https://bit.ly/32k8M5E) 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 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: a) HCV Report of PT Harisa Agro Lestari (https://bit.ly/3EcXZMP) that has obtained satisfactory status (note: the area was part of PT Harisa Agro Lestari, which PT MPG officially acquired on 1st April 2018); b) HCS Report of PT Multipersada Gatramegah in 2018 that has covered the area in question (https://bit.ly/3qa10Uk) which has completed HCSA review process (https://bit.ly/3pe7PVS); c) This area has also undergone the RSPO NPP process (https://bit.ly/3spPEyf). All reports are published and available on HCVRN, HCSA, and RSPO websites, respectively.	Closed	20-Dec-21
Musim Mas	Reports of deforestation and/or peatland development in the following concession: - PT Multipersada Gatramegah	Mighty Earth Rapid Response Report 37	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they have been engaging with RH. An array of documents were provided rebutting the allegations. The documents included written statements and consent from landowners to ascertain FPIC, communication with Royal Papua New Guinea (PNG) Constabulary, agreement with landowner company issued by PNG National Court, and a field visit report by an independent consultant. The documents shared have not addressed the matter of a lack of Personal Protective Equipment (PPE) provided to workers. This will be further investigated. On the matter of allegations of violence and harassment, RH clarified that police presence was approved by the Royal PNG Constabulary, and no malpractice was identified upon investigations of authorities including the Ombudsman Commission. On the point of deforestation and environmental degradation issues, RH clarified that all legal requirements are met. Compliance is monitored by the PNG Forest Authority Project supervisor onsite. Additionally, our direct supplier has been engaging with RH since 2018 on NDPE compliance. A commitment to conduct HCV-HCS assessment prior to any new land clearing was made. Our direct supplier is also engaging with RH on the matter of PPE provisions and health and safety practices.	Closed	20-Dec-21
Felda Global Ventures Holding Bhd	Reports of peat development in the following concessions: - PT Temila Agro Abadi	Mighty Earth Rapid Response Report 9	Indirectly with parent company via third party suppliers/traders.	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: https://www.fgvholdings.com/sustainability/reports-updates/ Our direct supplier informed us that FGV has a stop work order for TAA since 2017. Please find FGV's press release here: https://www.fgvholdings.com/press-releases/2022/02/fgv-issues-stop-work-order-for-taa-since-2017	Closed	20-Dec-21
Rimbunan Hijau	Reports of various NDPE violations including environmental degradation, deforestation, and human rights and health and safety violations	Global Witness - The True Price of Palm Oil	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that they have been engaging with RH. An array of documents were provided rebutting the allegations. The documents included written statements and consent from landowners to ascertain FPIC, communication with Royal Papua New Guinea (PNG) Constabulary, agreement with landowner company issued by PNG National Court, and a field visit report by an independent consultant. The documents shared have not addressed the matter of a lack of Personal Protective Equipment (PPE) provided to workers. This will be further investigated. On the matter of allegations of violence and harassment, RH clarified that police presence was approved by the Royal PNG Constabulary, and no malpractice was identified upon investigations of authorities including the Ombudsman Commission. On the point of deforestation and environmental degradation issues, RH clarified that all legal requirements are met. Compliance is monitored by the PNG Forest Authority Project supervisor onsite. Additionally, our direct supplier has been engaging with RH since 2018 on NDPE compliance. A commitment to conduct HCV-HCS assessment prior to any new land clearing was made. Our direct supplier is also engaging with RH on the matter of PPE provisions and health and safety practices.	Monitoring	28-Oct-21
Yayasan Sabah	Reports of deforestation and/or peatland development in the following concessions: - Innoprise Plantations Bhd	Mighty Earth Rapid Response Report 36	Indirect with parent company via third party suppliers/traders.	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.	Closed	28-Oct-21

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Padasa Enam Utama	Reports of NDPE violations in the following concessions: - Koto Kampar	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on both allegations. 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: https://peraturan.go.id/common/dokumen/bn/2020/bn1377-2020.pdf 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.	Monitoring	28-Oct-21
First Resources	Reports of NDPE violations in the following concessions: - Cilandra Perkasa	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. ADM is requesting information to direct supplier to clarify the situation.	Under Investigation	28-Oct-21
Astra Agro Lestari	Sari Aditya Loka 1 - Land dispute, evictions, violent confrontation, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	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: https://bit.ly/2Ub1GfU	Monitoring	28-Oct-21
Persada Alam Jaya	Persada Alam Jaya - Purchasing FFB grown illegally	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	28-Oct-21
Capitol Group	Reports of deforestation and/or peatland development in the following concessions: - PT Medco Papua Hijau Selaras	Mighty Earth Rapid Response Report 25, 26, 27, 28, 29	Indirect via third party suppliers/traders	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 (RPDAS) and has committed to plant 30,000 trees as part of its rehabilitation program. The HCV/HCS report shall be submitted.	Closed	28-Oct-21
Samling Group	Reports of deforestation in the following concessions: - LPF/008 Marudi & Batu Belah	Mighty Earth Rapid Response Report 13, 17, 19, 20, 21, 24, 26, 28, 30, 36	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	28-Oct-21
Austindo Nusantara Jaya Agri (ANJ Group)	Reports of deforestation in the following concessions: -PT Putera Manunggal Perkasa	Mighty Earth Rapid Response Report 10, 11	Indirectly with parent company via third party suppliers/traders.	Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: https://bit.ly/2xv9x9N 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: https://anj-group.com/en/sustainability-approach-and-policies ANJ has communicated with Mighty Earth and also shared the first progress report of its recovery plan programme: https://bit.ly/3koUwwH The second progress report can be found under: https://bit.ly/3iqzNtu	Monitoring	28-Oct-21

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Austindo Nusantara Jaya Agri (ANJ Group)	Reports of deforestation in the following concessions: -PT Permata Putera Mandiri (Blok I)	Mighty Earth Rapid Response Report 3, 4, 6, 8, 10	Indirectly with parent company via third party suppliers/traders.	Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: https://bit.ly/2xv9x9N 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: https://anj-group.com/en/sustainability-approach-and-policies ANJ has communicated with Mighty Earth and also shared the first progress report of its recovery plan programme: https://bit.ly/3koUwwH The second progress report can be found under: https://bit.ly/3koUwwH	Monitoring	28-Oct-21
Anglo-Eastern Plantations	Reports of deforestation in the following concessions: - PT Kahayan Agro Plantation	Mighty Earth Rapid Response Report 1, 14, 15, 18, 19, 20, 24, 25, 27	Indirect with parent company via third party suppliers/traders.	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	Closed	28-Oct-21
PT Cipta Cakra Murdaya Case 10 in Report	Reports of NDPE violations in the following concessions: - PT Hardaya Inti Plantation Land conflict and community claims for land restitution and reparations unresolved	Forest Peoples Programme: Demanding accountability	Indirect with parent company via third party suppliers/traders.	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.	Closed	15-Sep-21
PT Kurnia Luwuk Sejati	Reports of NDPE violations in the following concessions: - PT Kurnia Luwuk Sejati Land conflicts and land restitution claims unresolved	Forest Peoples Programme: Demanding accountability	Indirect with parent company via third party suppliers/traders.	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.	Closed	15-Sep-21
PT Inti Nusa Sejahtera/ PT Capitol	Reports of NDPE violations in the following concessions: - PT Mitra Austral Sejahtera Unresolved land tenure grievances	Forest Peoples Programme: Demanding accountability	Indirect with parent company via third party suppliers/traders.	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: https://askrspo.force.com/Complaint/s/case/50090000028ErzsAAC/detail	Monitoring	15-Sep-21
Salim Group	Reports of NDPE violations in the following concessions: - PT Mitra Intisejati Plantation Unresolved and ongoing grievances	Forest Peoples Programme: Demanding accountability	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	15-Sep-21
PT SMART tbk (GAR)	Reports of NDPE violations in the following concessions: - PT Kresna Duta Agrindo Unresolved longstanding land disputes	Forest Peoples Programme: Demanding accountability	Direct with parent company.	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.	Closed	15-Sep-21
Ta Ann Group	Reports of deforestation and/or peatland development in the following concessions: - LPF 0010	Mighty Earth Rapid Response Report 35	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that LPF0010 is a License Planted Forest (LPF) area, where the land development is not related to oil palm operations.	Closed	15-Sep-21
Bukit Asam	Reports of deforestation and/or peatland development in the following concessions: - PT Bumi Sawindo Permai	Mighty Earth Rapid Response Report 35	Indirect with parent company via third party suppliers/traders.	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	Closed	15-Sep-21
Triputra Agro Persada	Reports of deforestation and/or peatland development in the following concessions: - PT Brahma Binabakti	Mighty Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	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. Please see the verification report: https://bit.ly/3qONoOi 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 be corrected.	Monitoring	15-Sep-21

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Wings Agro	Reports of deforestation and/or peatland development in the following concessions: - PT Gawi Makmur Kalimantan	Mighty Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	15-Sep-21
First Resources	The company allegedly has ownership over Fangiono Agro Plantation (FAP) Agri and Cliandry Anky Abadi (CAA) neither of which were disclosed as being part of the RSPO Group Membership	Aidenvironment	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier(s) for investigation and is following the case through the RSPO Complaints Panel (CP). 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: https://askrspo.force.com/Complaint/s/case/5000o00003CLXepAAH/detail	Monitoring	15-Sep-21
First Resources	Reports of deforestation and/or peatland development in the following concessions: - PT Wahana Prima Sejati	Aidenvironment	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier(s) for investigation and is following the case through the RSPO Complaints Panel (CP). So far, a stop work order has been implemented by First Resources as ordered by the CP. Additionally, First Resources shall be providing documentation requested by the CP by April 16, 2021. There have been no further updates by the CP so far. ADM will continue to monitor the case. 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: https://askrspo.force.com/Complaint/s/case/5000o000030i7JDAAY/detail	Monitoring	15-Sep-21
SIPEF	Reports of deforestation and/or peatland development in the following concessions: - PT Agro Muara Rupit	Mighty Earth Rapid Response Report 32	Indirect with parent company via third party suppliers/traders.	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: https://bit.ly/3o3gQ06 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	Closed	15-Sep-21
Chora Agro Resources	Reports of NDPE violations in terms of land rights, labor rights, and environmental concerns in the following concession: - PT Mitra Abadimas Sejahtera	Local community stakeholders, cooperatives, and oil palm farmers.	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that they are already engaging with PT MAS. However, PT MAS is currently undergoing a management takeover which will delay investigations. The grievance raiser has also been engaged with. ADM will continue to monitor this case.	Monitoring	31-Jul-21
Rimbunan Hijau	Reports of deforestation and/or peatland development in the following concessions: - Rimbunan Hijau LPF 0026	Might Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	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.	Closed	31-Jul-21
Rajawali Group/ Eagle High Plantations	Reports of deforestation and/or peatland development in the following concessions: - PT Tandan Sawit Papua	Might Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	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: https://bit.ly/3vj24W	Closed	31-Jul-21
Bukit Barisan Indah Prima	Reports of land conflicts involving the subsidiary: - PT Artha Prigel	Milieudedefensie - Friends of the Earth Netherlands	Indirect with parent company via third party suppliers/traders.	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.	Closed	31-Jul-21
PT Teupin Lada	The company was found to be sourcing from PT Indo Alam, who violates NDPE policies.	RAN - Rainforest Action Network	Indirect with parent company via third party suppliers/traders.	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.	Closed	31-Jul-21
Rimbunan Hijau	Reports of deforestation in the following concessions: - Rimbunan Sawit Sdn Bhd (Simunjan Estate)	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	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.	Closed	31-Jul-21
PT. Runding Putra Persada	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Closed	31-Jul-21
PT. Ensem Sawita Lestari	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Closed	31-Jul-21

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
PT. Sumatera Sawit Nabati	<ul style="list-style-type: none"> Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife Reserve in the Singkil-Bengkung region of the Leuser Ecosystem Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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: http://bit.ly/2E4moTr	Monitoring	31-Jul-21
PT. Global Sawit Semesta	<ul style="list-style-type: none"> Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife Reserve in the Singkil-Bengkung region of the Leuser Ecosystem Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem 	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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 laid 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: http://bit.ly/2E4moTr	Monitoring	31-Jul-21
Incasi Raya	Reports of deforestation in the following concessions: - PT Avena Sepakat	Mighty Earth Rapid Response Report 17	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that it was not PT Avena 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 Avena Sepakat concession.	Closed	31-Jul-21
Ta Ann Group	Reports of deforestation in the following concessions: - Ladang Selezu Sdn Bhd	Mighty Earth Rapid Response Report 15	Indirectly with parent company via third party suppliers/traders.	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.	Closed	31-Jul-21
Incasi Raya Group	Reports of deforestation, peat development and peat forest development in the following concessions: - PT Sumatera Jaya Agro Lestari	Mighty Earth Rapid Response Report 10	Indirectly with parent company via third party suppliers/traders.	Our supplier was informed that a constructive engagement meeting was held with Incasi Raya in February. Incasi Raya has stopped any further land clearing and they have been considering a reforestation program. ADM is monitoring the progress through direct suppliers and public communications. PT SJAL conducts HCS and HCV assessment prior to any land clearing.	Closed	31-Jul-21
Bumi Gading Prima (BGP)	Reports of deforestation and/or peatland development in the following concessions: - PT Bumi Agro	Mighty Earth Rapid Response Report 33	Indirect with parent company via third party	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: https://bit.ly/2PVdW2f	Monitoring	30-Jun-21
Astra International Tbk	Reports of deforestation and/or peatland development in the following concessions: - PT Agincourt Resources Tbk	Mighty Earth Rapid Response Report 33	Indirect via third party suppliers/traders.	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.	Closed	30-Jun-21
First Resources	Reports of deforestation in the following concessions: - PT Ketapang Agro Lestari	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	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.	Closed	30-Jun-21
Widya Corporation	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Mulia Inti Perkasa	Mighty Earth Rapid Response Report 6, 15, 16, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29	No direct or indirect connection between ADM and the parent company or mill.	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: https://bit.ly/3pX4Wa1	Closed	30-Jun-21
Tsani Hutani Abadi Group	Reports of deforestation in the following concessions: -PT Kruing Lestari Jaya	Mighty Earth Rapid Response Report 9	No direct or indirect connection between ADM and the parent company or mill.	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 is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments. 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.	Monitoring	30-Jun-21
Tsani Hutani Abadi Group	Reports of deforestation in the following concessions: -PT Harapan Rimba Jaya	Mighty Earth Rapid Response Report 2, 5, 9	No direct or indirect connection between ADM and the parent company or mill.	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 is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments. 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.	Monitoring	30-Jun-21

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Tsani Hutani Abadi Group	Reports of deforestation in the following concessions: -PT Rayatama Jaya	Mighty Earth Rapid Response Report 2, 5, 6, 9, 14	No direct or indirect connection between ADM and the parent company or mill.	THA made significant progress on its sustainability program and has been publicly reporting updates through 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. 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.	Monitoring	30-Jun-21
Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 20	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	31-Mar-21
Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 21	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	31-Mar-21
Yayasan Pelajaran Johor (Johor State Government)	Reports of deforestation and/or peatland development in the following concessions: - YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara)	Mighty Earth Rapid Response Report 32	Indirect via third party suppliers/traders	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. ADM will continue to monitor this case.	Monitoring	26-Feb-21
Bunga	Reports of deforestation and/or peatland development in the following concessions: - Value Greenworld Sdn Bhd	Mighty Earth Rapid Response Report 32	Indirect via third party suppliers/traders	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 or secondary forest in the concession in question. ADM will continue to monitor this case.	Monitoring	26-Feb-21
Perbadanan Kemajuan Pertanian Negari Pahang	Reports of deforestation and/or peatland development in the following concessions: - PKNP (Tembeling)	Mighty Earth Rapid Response Report 31	Indirect via third party suppliers/traders	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: https://bit.ly/3dRRWim https://bit.ly/3knZktd	Closed	26-Feb-21
FGV Holdings Berhad and its subsidiaries and joint ventures	Reports of deforestation and human rights violations	US Border Customs	Indirect via third party suppliers/traders	ADM reached out to its direct suppliers and FGV for investigation. FGV assures their commitment to respecting human rights and to upholding labour standards. In March 2020, FGV published an action plan to address labor issues and commit to aligning its practices with the Fair Labor Association's Principles of Fair Labor and Responsible Sourcing for Companies with Agricultural Supply Chains (Principles): https://www.fgvholdings.com/wp-content/uploads/2020/03/Background-and-Summary-of-FGV-Action-Plan-2020.pdf FGV has been engaging with the Fair Labor Association who published a report regarding FGV's action plan: https://www.fgvholdings.com/wp-content/uploads/2020/10/021020-FLA-Assessment-Report-on-the-Implementation-of-FGVs-Action-Plan-to-Enhance-Labour-Practices.pdf The U.S. Customs and Border Protection (CBP) placed a Withhold Release Order (WRO) on palm oil products made by FGV at all U.S. ports of entry. Please find FGV's public communication on this matter here: https://www.fgvholdings.com/wp-content/uploads/2020/10/Updates-on-the-CBP-WRO.pdf FGV is communicating with various third-party auditing firms to conduct an audit of its operations in order to file a petition with the CBP to have the WRO revoked. Further updates can be found on FGV's website: https://www.fgvholdings.com/sustainability/reports-updates/ FGV has revised its Group Sustainability Policy to be more encompassing and further align with the FLA's Workplace Code of Conduct. FGV has also been involved in further verification processes and audits. Please the link for updates: https://www.fgvholdings.com/wp-content/uploads/2021/01/FGV-Sustainability-Updates-January-2021.pdf ADM will continue to monitor this case.	Monitoring	26-Feb-21
PT. Bumi Daya Agrotamas	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	26-Feb-21
Pactra Group	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 2)	Mighty Earth Rapid Response Report 14, 18	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	26-Feb-21

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Pactra Group	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 1)	Mighty Earth Rapid Response Report 14, 18	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	26-Feb-21
Rimbunan Hijau	Reports of peat development and clearance prep/stacking lines in the following concessions: - Erabaya Synergy Sdn Bhd (Lassa division, part of LPF/0029)	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	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.	Closed	26-Feb-21
Dharma Sawit Nusantara Tbk (DSN Group)	Reports of deforestation in the following concessions: - PT Prima Sawit Andalan	Mighty Earth Rapid Response Report 17	Indirect with parent company via third party suppliers/traders.	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.	Closed	26-Feb-21
Brazil - Ten properties as listed in the report in the municipalities of Piauí, Maranhão, Mato Grosso and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 19	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	26-Feb-21
Sime Darby Plantation Berhad and its subsidiaries, joint ventures, and affiliated entities in Malaysia	Reports of human rights violations	U.S. Customs and Border Protection	Direct with parent company.	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: https://bit.ly/3ogrwxq SD has been reporting on the progress of its Human Rights and Labor Program for a number of years: https://www.simedarbyplantation.com/sustainability/modern-slavery-act-statement We were also informed that SD actively seeks third party assessments and input. Most recently, 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: https://rspo.org/news-and-events/news/rspo-statement-on-the-us-cbps-withhold-release-order-for-sime-darby-plantations SD is currently in the process of commissioning a third party labor assessor. The CBP is prepared to review the WRO upon completion of a third party labor assessment. In the meantime, SD is implementing a range of initiatives to further improve its labor practices on the ground. ADM will continue to monitor this case.	Monitoring	29-Jan-21
Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd)	Reports of deforestation and/or peatland development in the following concessions: - PKPP Plantation Sdn Bhd (Cherating)	Mighty Earth Rapid Response Report 31	Indirect via third party suppliers/traders	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.	Closed	29-Jan-21
Yayasan Pahang	Reports of deforestation and/or peatland development in the following concessions: - YP Plantation Sdn Bhd	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that that YPP conducted 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. https://ypph.com.my/v4/polisi-mspo/#1599635710116-a294b1da-05dd	Closed	29-Jan-21
Amanah Saham Pahang	Reports of deforestation and/or peatland development in the following concessions: - Amanah Saham Pahang (ASPA) - Berabong Estate	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders	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.	Closed	29-Jan-21
Amanah Saham Pahang	Reports of deforestation and/or peatland development in the following concessions: - Mentiga Corporation Bhd (area B)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders	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.	Closed	29-Jan-21

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Amanah Saham Pahang	Reports of deforestation and/or peatland development in the following concessions: - Mentiga Corporation Bhd (area A)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders	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.	Closed	29-Jan-21
Instant Star Holdings Sdn Bhd	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area B)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders	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: https://www.ijmplantations.com/grievances-compliance-matters.php	Closed	29-Jan-21
Instant Star Holdings Sdn Bhd	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area A)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders	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: https://www.ijmplantations.com/grievances-compliance-matters.php	Closed	29-Jan-21
Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd)	Reports of deforestation and/or peatland development in the following concessions: - PKPP Plantation Sdn Bhd	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders	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.	Closed	29-Jan-21
Gemilang Jaya Kencana Abadi/ Putra Keritang Sawit	Putera Keritang Sawit - Waste dumping, purchasing FFB grown illegally	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PKS was engaged with and the immediate actions were required to be put in place to ensure the purchase of illegally grown FFB is prevented in the future. Apical together with their consultants conducted a verification visit to PKS on the report by EoF. They found that appropriate actions were taken to ensure no illegal FFB sourcing (https://www.apicalgroup.com/sustainability/grievances/apical/). 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.	Monitoring	07-Jan-21
Wilmar International Ltd	Mustika Sembuluh 2 - Land dispute, waste dumping, indigenous persons affected	Global Witness	Direct with parent company.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority). 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). 3. The company has undergone the customary process in addressing the allegation at Pondok Damar Village. https://beritakalteng.com/2018/05/14/jalani-sidang-adat-pt-mustika-sembuluh-wajib-bayar-2-311-kati-ramu/	Closed	07-Jan-21
Wilmar International Ltd	Mustika Sembuluh 1 - Land dispute, waste dumping, indigenous persons affected	Global Witness	Direct with parent company.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority). 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).	Closed	07-Jan-21
Kharisma Agro Sejahtera	Kharisma Agro Sejahtera - Waste dumping, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. PT Kharisma Agro Sejahtera (KAS) has clarified that the allegations are untrue. 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. 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.	Closed	07-Jan-21
Kencana Utama Sejati	Kencana Utama Sejati - Air pollution	Global Witness	Indirect with parent company via third party suppliers/traders.	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: 1. Ambient Air Quality 2. Quality of smell 3. Noise Quality 4. Vibration Quality 5. Immovable Source Emission Quality	Closed	07-Jan-21

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Kuala Lumpur Kepong Bhd	Jabontara Eka Karsa - Deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The previous owner started an oil palm plantation on the eastern section of the estate in 1997. It was later abandoned. 2. When KKK took over in 2006, this area was replanted. Subsequently, after a HCV assessment was conducted in 2010 KKK continued to develop the remaining areas of Jabontara estate until 2014. 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. At time of development, we were guided by the relevant RSPO's requirements/definition. 5. The primary forest areas on the far eastern end and far western end of the estate was left intact and conserved. 6. This estate is certified to RSPO and ISPO since 2017 and 2018, respectively.	Closed	07-Jan-21
Wilmar International Ltd	Bumi Sawit Kencana - Land dispute, intimidations, violent confrontation	Global Witness	Direct with parent company.	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.	Closed	07-Jan-21
Palm - 129 entries as listed in the report	Reports of land disputes, environmental infractions, human rights violations, corruption, and deforestation.	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Under investigation	07-Jan-21
Brazil - Seven properties as listed in the report in the states of Mato Grosso, Pará, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 17	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	07-Jan-21
GOLDEN AGRI/ Ivo Mas Tunggal	Ujung Tanjung - Land grab, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. ADM was informed by its direct supplier that: - 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 -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. The case was brought to the RSPO. Upon consideration of the facts and evidence, the RSPO dismissed the case. This can be found under: http://bit.ly/2zu68t7	Closed	07-Dec-20
SIPEF	Tolan Tiga Indonesia - Land dispute, evictions, criminalisation	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Tayan Bukit Sawit	Tayan Bukit Sawit - Suspected licensing violations	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	07-Dec-20
Syaukath Agro	Syaukath Agro - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Surya Utama Nabati	Surya Utama Nabati - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Sumber Sawit Nusantara	Sumber Sawit Nusantara - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Rezeki Kencana	Rezeki Kencana - Land dispute, waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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: Appoint and assign a person in charge to carry out environmental management and monitoring at the unit level; File records in LB3 warehouse; Strengthen efforts to manage empty bunches and solid citation; Our direct supplier continues to engage PT RK and monitor the progress.	Monitoring	07-Dec-20
Raja Marga	Raja Marga - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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: https://bit.ly/3nKQ6Bs 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.	Closed	07-Dec-20
Parasawita	Parasawita - Land dispute, evictions, criminalization	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Multiguna Lestari Abadi	Multiguna Lestari Abadi - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Minanga Ogan	Minanga Ogan - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	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. 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. 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. Finally, as also stated in the news, the realization of payroll can be completed on Friday, May 31, 2019 together with the realization of the overall employee THR payment (allowance for celebrating Idul Fitri Holiday).	Closed	07-Dec-20
Sumber Jaya Indahnusa	Kota Tengah - Land dispute, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	07-Dec-20
Ja Wattie/ Kintap Jaya Wattindo	Kintap Jaya Wattindo - Land dispute, criminalisation, deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Indomas Mitra Teknik	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: https://bit.ly/3eCJffi	Closed	07-Dec-20
Hutan Alam Lestari	Hutan Alam Lestari - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Garuda Food/ Garuda Bumi Perkasa	Garuda Bumi Perkasa - Land dispute, waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	07-Dec-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Citra Sawit Harum	Citra Sawit Harum - Land dispute, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that CSH has committed to its NDPE policy: 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. For the surrounding village community, Citra Harum Sawit also recruits them as employees. Our direct supplier also works with local communities to transport FFB.	Closed	07-Dec-20
Ciptamas Bumi Selaras	Ciptamas Bumi Selaras - Land dispute, waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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: 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. 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. 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 . 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. 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.	Closed	07-Dec-20
Campang Tiga	Campang Tiga - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	07-Dec-20
Beurata Subur Persada	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: http://bit.ly/2Kpq2tj A moratorium and NDPE commitment has been in place since early 2020: https://bit.ly/2Hlr1du The overflow occurred due to heavy rain which the embankment (tanggul) could not withstand. The embankment has been raised and built with better materials.	Closed	07-Dec-20
Berkat Sawit Sejahtera	Berkat Sawit Sejahtera (Inhil) - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Bengkulu Sawit Lestari	Bengkulu Sawit Lestari - Land dispute, waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	07-Dec-20
Paramitra Internusa Pratama	Belian Mill - Land dispute, deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Kencana Persada Nusantara	Arya Rama Prakarsa - Land dispute, deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.	Closed	07-Dec-20
Archipelago Timur Abadi	Archipelago Timur Abadi - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.	Closed	07-Dec-20
Angso Duo Sawit/Mewah	Angso Duo Sawit - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Agro Wijaya Industri	Agro Wijaya Industri - Waste dumping, operating without a permit	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Adimulia	Adimulia Agrolestari - Land dispute, watershed violations	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Abdi Budi Mulia	Abdi Budi Mulia 2 - Land dispute, waste dumping, other environmental infractions	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Abdi Budi Mulia	Abdi Budi Mulia 1- Land dispute, waste dumping, other environmental infractions	Global Witness	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Sime Darby	The mill Lavang (SOU 31) seems to be linked to deforestation in the Layang estate concession	Actiam	Indirect with parent company via third party suppliers/traders.	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": https://sd-platinum.maps.arcgis.com/apps/webappviewer/index.html?id=e29b476ae8c64e5e875cdfa8fc0ab731	Closed	07-Dec-20
Tradewinds Plantation Phd.	The mill Binu Plantations seems to be linked to deforestation in the Binu Plantations Bhd. Sdn. concession.	Actiam	Indirect with parent company via third party suppliers/traders.	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.	Closed	07-Dec-20
Not Applicable	Reports of Human Rights Violations in the Xinjiang Uyur Autonomous Region	Bell	No identifiable direct or indirect connection between ADM and the region.	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.	Monitoring	07-Dec-20
Brazil - Eleven properties as listed in the report in the municipalities of Bahia, Pará, Maranhão, and Mato Grosso.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 14	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	06-Nov-20
Brazil - Ten properties as listed in the report in the state of Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 16	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	06-Nov-20
Rimbunan Hijau	Reports of deforestation and/or peatland development in the following concessions: - PJP Pelita Lundu Plantation Sdn Bhd	Mighty Earth Rapid Response Report 29	Indirect with parent company via third party suppliers/traders.	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.	Closed	31-Aug-20
Mulia Sawit Agro Lestari (MSAL)	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Persada Sejahtera Agro Makmur	Mighty Earth Rapid Response Report 22	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	31-Aug-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Wings Group Indonesia	Reports of deforestation in the following concessions: -PT Sentosa Suksesutama	Mighty Earth Rapid Response Report 12	No direct or indirect connection between ADM and the parent company or mill.	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.	Closed	31-Aug-20
Mulia Sawit Group	Reports of peat development, peat forest development, clearance prep/Stacking lines in the following concessions: - PT Persada Era Agro Kencana	Mighty Earth Rapid Response Report 9, 10, 11, 12, 15, 17, 18, 20, 22, 23, 24, 25, 27, 28, 29	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	31-Aug-20
Brazil - Eleven properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 13	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	31-Aug-20
Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, Pará, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 12	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	31-Aug-20
Brazil - Thirteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 11	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	31-Aug-20
Paraguay - Twelve properties as listed in the report in the municipalities of Boquerón, Alto Paraguay, and Presidente Hayes.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 15	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	31-Aug-20
PT.Socfindo	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Monitoring	31-Jul-20
PT. Delima Makmur	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Monitoring	31-Jul-20
PT. Perkebunan Lembah Bakti II	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Closed	31-Jul-20
Surya Dumai	Reports of clearance prep/stacking lines in the following concessions: - PT Kalimantan Agro Kencana	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT KAK is not part of Surya Dumai.	Closed	31-Jul-20
Permata Hijau	Ommiting mills from mill list that are tied to deforestation	RAN - Rainforest Action Network	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	29-Jun-20
Teladan Prima	Reports of deforestation and/or peatland development in the following concessions: - PT Tanjung Buyu Perkasa Plantation	Mighty Earth Rapid Response Report 26	Indirect with parent company via third party suppliers/traders.	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: https://bit.ly/2RhlfyR 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: https://bit.ly/2V5qqmF	Closed	29-Jun-20
Medco	Reports of deforestation and/or peatland development in the following concessions: - PT Energi Mitra Merauke	Mighty Earth Rapid Response Report 25	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Gama	Reports of deforestation and/or peatland development in the following concessions: - PT Agro Lintas Nusantara	Mighty Earth Rapid Response Report 17, 18, 24	Indirect with parent company via third party suppliers/traders.	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: https://www.wilmar-international.com/wp-content/uploads/2018/09/100818-aide-announcement.pdf	Closed	29-Jun-20
TH Plantations Bhd	Reports of deforestation and/or peatland development in the following concessions: - Hydroflow	Mighty Earth Rapid Response Report 14, 23, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the area in question is outside of Hydroflow'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.	Closed	29-Jun-20
PT Union Sampoerna Triputra Persada	Reports of deforestation and/or peatland development in the following concessions: - PT Harapan Hibrida Kalbar	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
NPC Resource Bhd	Reports of deforestation and/or peatland development in the following concessions: - PT Sumber Alam Selaras	Mighty Earth Rapid Response Report 23, 25, 26, 27, 29	Indirect with parent company via third party suppliers/traders.	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: https://www.npc.com.my/PublicStatement13Sep2018.pdf HCV and HCSA reports have been completed and peer reviewed. NPC is drafting an action plan based on findings and recommendations of the assessments.	Closed	29-Jun-20
Incasi Raya Group	Reports of deforestation and/or peatland development in the following concessions: - PT Makmur Agro Lestari	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Borneo Pacific Group	Reports of deforestation and/or peatland development in the following concessions: - PT Arjuna Utama Sawit	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	29-Jun-20
Kalimantan Sawit Kusama	Reports of deforestation in the following concessions: - PT Fajar Saudara Lestari	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	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: http://bit.ly/2EmiwNJ Kalimantan Sawit Kusama's official statement can be found here: http://bit.ly/2rHDIAu Spatial analysis for hotspots and wildfires here: http://bit.ly/36wRpeM	Closed	29-Jun-20
Goodhope	Reports of deforestation in the following concessions: - PT Rim Capital	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	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: http://bit.ly/2EhArF2 The field verification report can be found here: http://bit.ly/2LQfXYm http://bit.ly/2PA2STW	Closed	29-Jun-20
Fangiono Agro Plantation	Reports of deforestation in the following concessions: - PT Tirta Madu Sawit Jaya	Mighty Earth Rapid Response Report 22, 24, 25, 27	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Agro Sarimas Group	Reports of deforestation in the following concessions: - PT Agro Sarimas Indonesia	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	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: http://bit.ly/2PFatK7 Overlay map: http://bit.ly/2YCK8fE	Closed	29-Jun-20
Rimbunan Hijau	Reports of deforestation in the following concessions: - Timrest Sdn Bhd	Mighty Earth Rapid Response Report 21, 27, 28	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Teladan	Reports of deforestation in the following concessions: - PT Teladan Palma Perkasa	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Golden Plantation Tbk	Reports of deforestation, peat forest development and clearance prep/stacking lines in the following concessions: - PT Mitra Jaya Agro Palm	Mighty Earth Rapid Response Report 21	Indirect via third party suppliers/traders.	ADM reached out to direct supplier for investigation. We were informed that the land clearing spots were located outside PT MJAP concession.	Closed	29-Jun-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Global Enterprise Sdn Bhd	Reports of deforestation in the following concessions: - PT Bulunga Surya Pratama	Mighty Earth Rapid Response Report 21, 27	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Dhanistha Surya Nusantara	Reports of deforestation in the following concessions: - PT Sabhantara Rawi Sentosa	Mighty Earth Rapid Response Report 21, 23, 26, 27	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Felda Global Ventures	Reports of deforestation in the following concessions: - PT Citra Niaga Perkasa	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
STH Group (Sin Tek Huat)	Reports of deforestation in the following concessions: - PT Makmur Bersama Asia	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
IJM Group	Reports of deforestation in the following concessions: - PT Prima Bahagia Permai	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Dharma Satya Nusantara (DSN Group)	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 2)	Mighty Earth Rapid Response Report 20, 23, 27	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Dharma Satya Nusantara (DSN Group)	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 1)	Mighty Earth Rapid Response Report 20, 23, 27	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Sime Darby Group	Reports of deforestation in the following concessions: - Sime Darby Plantation Sdn Bhd (Derawan, SOU 33)	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Rimbunan Hijau Group	Reports of clearance prep/stacking lines in the following concessions: - RH Plantation (Selangor Estate)	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
AlamBumi Group	Reports of deforestation in the following concessions: - AlamBumi Sdn Bhd	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to AlamBumi Sdn Bhd.	Closed	29-Jun-20
Samuel International Group	Reports of clearance prep/stacking lines in the following concessions: - PT Bina Sarana Sawit Utama	Mighty Earth Rapid Response Report 19, 20, 24, 26, 27	Indirectly via third party suppliers/traders.	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: http://bit.ly/2kqcc1m	Closed	29-Jun-20
Goodhope Group	Reports of deforestation in the following concessions: - PT Sumber Hasil Prima	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Lyman Agro Group	Reports of deforestation in the following concessions: - PT Bonti Permai Jayaraya	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Woodman Group	Reports of deforestation and peat development in the following concessions: - Baram Estate (Part of LPF/0004)	Mighty Earth Rapid Response Report 18, 21, 27	Indirect with parent company via third party suppliers/traders.	We were informed that the concession is not related to palm oil production and the area is not within Woodman's concession.	Closed	29-Jun-20
Tradewinds	Reports of peat forest development in the following concessions: - Trans Kenyalang Sdn Bhd	Mighty Earth Rapid Response Report 18, 19, 26	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
TH Plantations Bhd (Tabung Haji)	Reports of peat development in the following concessions: - TH Pelata Meludam Sdn Bhd	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Rimbunan Hijau	Reports of peat development in the following concessions: - Woodijaya Sdn Bhd (Lot 197)	Mighty Earth Rapid Response Report 18, 26, 27	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing was conducted by communities for planting of pineapple.	Closed	29-Jun-20
KLK Bhd (Kuala Lumpur Kepong Bhd)	Reports of peat development in the following concessions: - PT Menteng Jaya Sawit Perdana	Mighty Earth Rapid Response Report 18, 19, 21	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Golden Plantation Tbk	Reports of deforestation in the following concessions: - PT Airlangga Sawit Jaya	Mighty Earth Rapid Response Report 18	Indirectly via third party suppliers/traders.	We were informed from one supplier that the land clearing location mentioned by Mighty Earth was outside PT ASJ ILOK.	Closed	29-Jun-20
KPN Group	Reports of deforestation in the following concessions: - PT Sumatera Unggul Makmur	Mighty Earth Rapid Response Report 18, 28	Indirectly with parent company via third party suppliers/traders.	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: http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf For a list of KPN Plantation Group member companies please see below: http://kpnplantation.com/assets/gama-files/pressrelease/2019_Oct_KPN_-_2nd_Progress_Report_-_01112019.pdf Furthermore, the company has provided a time-bound action plan that puts into operation its NDPE commitments: http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf ADM considers this case closed, but continues to monitor the progress through direct suppliers and public communications.	Closed	29-Jun-20
Asian Agri (RGE)	Reports of peat forest development, clearance prep/stacking line in the following concessions: -PT Usaha Sawit Unggul	Mighty Earth Rapid Response Report 17, 18, 20, 24, 26, 27	Indirect via third party suppliers/traders	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: https://www.apicalgroup.com/sustainability/grievances/asian-agri-2/	Closed	29-Jun-20
CB Industrial Product Holding/ Jholin Group	Reports of deforestation in the following concessions: - PT Kurun Sumber Rezeki	Mighty Earth Rapid Response Report 17	No direct or indirect connection between ADM and the parent company or mill.	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	Closed	29-Jun-20
Woodman Group	Reports of peat development in the following concessions: -Liku estate, part of LPF 004	Mighty Earth Rapid Response Report 17, 18	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Woodman Group	Reports of peat development in the following concessions: -Adong estate, part of LPF 004	Mighty Earth Rapid Response Report 17, 18, 21, 27	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
WTK	Reports of deforestation in the following concessions: - Southwind Plantation Sdn Bhd	Mighty Earth Rapid Response Report 17, 19	Indirectly via third party suppliers/traders.	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.	Closed	29-Jun-20
Rimbunan Hijau	Reports of peat development, clearance prep/stacking line in the following concessions: -Poh Zhen Sdn Bhd	Mighty Earth Rapid Response Report 17, 19, 20, 26, 29	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Yuwang/ Empresa (M) Sdn Bhd	Reports of deforestation in the following concessions: - Empresa (M) sdn Bhd (OT/0351)	Mighty Earth Rapid Response Report 17, 18	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Boustead Plantation Bhd	Reports of clearance prep/stacking line in the following concessions: -Boustead Pelita Kanowit Sdn Bhd	Mighty Earth Rapid Response Report 17	Indirectly via third party suppliers/traders.	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.	Closed	29-Jun-20
Sumber Tani Agung	Reports of deforestation, clearance prep/stacking lines in the following concessions: - PT Tantahan Panduhup Asi	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.	Land clearing identified was proved to happen outside the concession	Closed	29-Jun-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Kirana Megatara	Reports of clearance prep/stacking lines in the following concessions: - PT Putra Katingan Pratama	Mighty Earth Rapid Response Report 17	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Kencana Agri Ltd	Reports of deforestation in the following concessions: - PT Agro Sawit Mas Lestari	Mighty Earth Rapid Response Report 17	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Genting Plantations Bhd	Reports of deforestation in the following concessions: - Sepanjang Intisurya Mulia (649.47 ha)	Mongabay	Indirect via third party suppliers/traders	The area identified in the Maphubs report showing deforestation is not in the Sepanjang Intisurya Mulia concession.	Closed	29-Jun-20
Saban Sawit Subur	Reports of deforestation in the following concessions: - Saban Sawit Subur (516.82 ha)	Mongabay	Indirect via third party suppliers/traders	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.	Closed	29-Jun-20
KL-Kepong Plantation Holdings Sdn Bhd	Reports of deforestation in the following concessions: -PT Jabontara Eka Karsa (442.06 ha)	Mongabay	Indirect via third party suppliers/traders	After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.	Closed	29-Jun-20
Ketapang Agro Lestari	Reports of deforestation in the following concessions: -PT Ketapang Hijau Lestari (990.7 ha)	Mongabay	Indirect via third party suppliers/traders	The company confirmed that they are not sourcing from concessions indicated to be carrying out forest clearing	Closed	29-Jun-20
Ahmad Zaki Resources Berhad (AZRB Group) Malaysia	Reports of deforestation in the following concessions: - Ichtar Gusti Pudi (425.97 ha)	Mongabay	Indirect via third party suppliers/traders	After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.	Closed	29-Jun-20
Genting Plantations Bhd	Reports of deforestation in the following concessions: - PT Citra Sawit Cemerlang	Mighty Earth Rapid Response Report 14, 15, 16, 17, 19, 23, 24, 27	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that Genting commissioned Aidenvironment to conduct the HCS assessment since June 2016. A working map shapefile was submitted to PT CSC in October 2017 after the assessment. It was clarified that the land clearing happened outside the identified HCS area Aidenvironment will submit the final HCS report for peer review, and in the meantime Stop work order is currently in place at PT CSC. Please see the link below: http://bit.ly/2JK6m68 ADM is monitoring the progress through direct suppliers and public communications.	Closed	29-Jun-20
Global Palm Resources	Reports of deforestation in the following concessions: - PT Prakarsa Tani Sejati	Mighty Earth Rapid Response Report 14	Indirect via third party suppliers/traders	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 (http://bit.ly/2v4XRca). The parent company implemented a NDPE Policy (http://www.gprholdings.com/environmental_policy.html). ADM is monitoring the progress through direct suppliers and public communications.	Closed	29-Jun-20
Jaya Tiasa Holding Berhad (Rimbunan Hijau Group)	Reports of deforestation in the following concessions: -LPF/0024	Mighty Earth Rapid Response Report 12	Indirect with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Tabung Haji Plantations (TH Plantations)	Reports of deforestation in the following concessions: -PT Persada Kencana Prima	Mighty Earth Rapid Response Report 5	Indirectly with parent company via third party suppliers/traders.	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.	Closed	29-Jun-20
Samuel International Group	Reports of deforestation in the following concessions: -PT Prasetya Mitra Muda Blok II	Mighty Earth Rapid Response Report 6	No direct or indirect connection between ADM and the parent company or mill.	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.	Closed	29-Jun-20
GAMA Group	Reports of deforestation in the following concessions: -PT Agriprima Cipta Persada	Mighty Earth Rapid Response Report 3, 4	Indirect with parent company via third party suppliers/traders.	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: http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf Furthermore, the company has provided a time-bound action plan that puts into operation its NDPE commitments: http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf 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.	Closed	29-Jun-20
KPN (formerly GAMA)	Reports of deforestation in the following concessions: -PT Agrinusa Persada Mulia	Mighty Earth Rapid Response Report 3, 20	Indirect with parent company via third party suppliers/traders.	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: http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf	Closed	29-Jun-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Fangiono Agro Plantation Group	Reports of deforestation in the following concessions: - PT Ketapang Hijau Lestari	Mighty Earth Rapid Response Report 9	Indirectly with parent company via third party suppliers/traders.	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: http://fap-agri.com/kebijakan/ http://fap-agri.com/tentang-kami/ ADM considers this case close but continues to monitor the progress through direct suppliers and public communications.	Closed	29-Jun-20
BLD Plantation	Reports of peat forest in the following concessions: -BLD Plantation	Mighty Earth Rapid Response Report 4, 5, 6, 7, 11	Indirectly with parent company via third party suppliers/traders.	BLDP has been working with Earthworm Foundation (EF) and has published their Sustainable Palm Oil Policy with NDPE commitments in May 2019 (http://www.bldpb.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf) 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.	Closed	29-Jun-20
BBC Holdings Sdn Bhd	Reports of deforestation in the following concessions: - Alambumi Plantation Sdn Bhd	Mighty Earth Rapid Response Report 21, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
QL Resources Sdn Bhd	Reports of deforestation in the following concessions: - PT Pipit Mutiara Indah	Mighty Earth Rapid Response Report 21, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us PMI has provided written confirmation of a NDPE policy and shared their concession map for ongoing verification. The area in question was felled several years before the commitment, and PMI committed to immediate moratorium.		3-Jun-20
Shin Yang group	Reports of deforestation in the following concessions: - Linau Sinar Sdn Bhd	Mighty Earth Rapid Response Report 13, 20, 21, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
CB Industrial Product Holding	Reports of deforestation in the following concessions: - PT Jaya Jadi Utama	Mighty Earth Rapid Response Report 15, 20, 23, 26, 27	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
Samling	Reports of deforestation in the following concessions: - LPF/0007 Samling Jelalong (OP)	Mighty Earth Rapid Response Report 14, 15, 16, 19, 20, 21, 23, 24, 25, 26, 27	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
Samling	Reports of deforestation in the following concessions: - LPF/0006 Samling Lana	Mighty Earth Rapid Response Report 15, 16, 18, 19, 20, 23, 25, 27	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
Shin Yang/Sarawak Oil Palms Bhd	Reports of deforestation in the following concessions: - Shin Yang OP Planting Area (LPF/0018)	Mighty Earth Rapid Response Report 18, 19, 20, 21, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
Samling	Reports of deforestation in the following concessions: - PT Tunas Borneo Plantations	Mighty Earth Rapid Response Report 18, 27, 28, 29	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
Pinehill Pacific Bhd	Reports of deforestation in the following concessions: - PT Makmur Jaya Malindo	Mighty Earth Rapid Response Report 18, 19, 27, 28	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	3-Jun-20
Unknown Group (PT MML formerly owned by PT Bakrie Sumatra Plantations Tbk)	Reports of deforestation in the following concessions: - PT Menthobi Mitra Lestari	Mighty Earth Rapid Response Report 16, 17, 20, 22, 27, 29	Indirect with parent company via third party suppliers/traders.	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.	Closed	3-Jun-20
Shin Yang	Reports of deforestation and/or peatland development in the following concessions: - Dataran Linau OP (SY) (Lot 1 Block 14 Murum LD)	Mighty Earth Rapid Response Report 17, 18, 19, 20, 21, 23, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Makin	Reports of peat forest development in the following concessions: - PT Mekar Karya Kahuripan	Mighty Earth Rapid Response Report 17, 21, 22, 23, 26, 27, 28	Indirect with parent company via third party suppliers/traders.	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.	Closed	3-Jun-20
Indonusa Group	Reports of deforestation in the following concessions: - PT Internusa Jaya Sejahtera	Mighty Earth Rapid Response Report 7, 10, 11, 12, 15, 17, 20, 22, 23, 25, 27, 28	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
Group Olmeca	Reports of human rights violations - Reforestadora de Palma de Peten SA (REPSA)	RAN - Rainforest Action Network	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	27-Apr-20
Nurdin Tampubolon Corporation (NT Corp)	Reports of deforestation in the following concessions: - PT Bintang Sakti Lengana	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that HCS/HCV assessments 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.	Monitoring	27-Apr-20
Kwantas Corporation	Reports of deforestation in the following concessions: - Kwantas Pelita Plantation (Balingian) Sdn Bhd	Mighty Earth Rapid Response Report 14, 17, 20, 26	Indirect with parent company via third party suppliers/traders.	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 Acquisition project. The land is privately owned and KPPSB has not been involved in any clearing activities.	Monitoring	27-Apr-20
Brazil - Fourteen properties as listed in the report in the municipalities of Amazonas, Bahia, Maranhão, Mato Grosso, Pará, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 8	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	27-Apr-20
Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 9	No direct connection between soy sourced by ADM and the areas of deforestation	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.	Monitoring	27-Apr-20
Brazil - Ten properties as listed in the report in the municipality of Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 10	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	27-Apr-20
KTS	Reports of deforestation and/or peatland development in the following concessions: - Wawasan Sedar Sdn Bhd	Mighty Earth Rapid Response Report 25	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	Under investigation	20-Mar-20
Salim/IndoGunta	Reports of deforestation in the following concessions: - PT Rimbun Sawit Papua	Mighty Earth Rapid Response Report 3, 10, 13, 14, 16, 17, 18, 20, 23, 25, 26, 28, 29	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
Double Dynasty Holdings Sdn Bhd	Reports of deforestation, clearance prep/Stacking line in the following concessions: - Mutiara Pelita Genaan Plantation Sdn Bhd	Mighty Earth Rapid Response Report 15, 16, 18, 19, 20, 25	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
Samling Group	Reports of deforestation, clearance prep/Stacking line in the following concessions: - Samling Jelalong LPF 0007 (Parts 1 & 3)	Mighty Earth Rapid Response Report 15, 18, 19, 20, 23, 25	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
Tuan Junus Sutiono and Tuan Watson Dharma	Reports of deforestation and clearance prep./stacking lines in the following concessions: - PT Subur Karunia Raya	Mighty Earth Rapid Response Report 6, 9, 16, 25	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
Bukit Berlian Plantation Group	Reports of deforestation and/or peatland development in the following concessions: - PT Ginang Fohu Plantation	Mighty Earth Rapid Response Report 17, 23, 28, 29	Indirect with parent company via third party suppliers/traders.	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: www.bukitberlian.com/Sustainability-Policy.html	Closed	21-Jan-20

Group	Issues	Reported by	Relationship	Progress	Status	Last Update
Shin Yang/Sarawak Oil Palms Bhd	Reports of deforestation in the following concessions: - Dataran Seping Sdn Bhd (Adam Oil Palm Estate)	Mighty Earth Rapid Response Report 20, 21	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	21-Jan-20
Shin Yang Group / Sarawak Oil Palms Bhd	Reports of clearance prep/Stacking line in the following concessions: - Shin Yang LPF 0018	Mighty Earth Rapid Response Report 15, 29	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	21-Jan-20
Double Dynasty Group	Reports of clearance prep./stacking lines in the following concessions: - Radiant Lagoon Sdn Bhd	Mighty Earth Rapid Response Report 13	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	21-Jan-20
Brazil - Twelve properties as listed in the report in the municipalities of Bahia, Mato Grosso, Goiás, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 7	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	21-Jan-20
Indonusa	Reports of deforestation in the following concessions: - PT Internusa Jaya Sejahtera (Merauke) - area 2	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	19-Dec-19
Indonusa	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Internusa Jaya Sejahtera (Merauke) - area 1	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	19-Dec-19
Palma Serasih	Reports of deforestation in the following concessions: - PT Global Primatama Mandiri	Mighty Earth Rapid Response Report 13, 21	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	19-Dec-19
Triputra Agro Persada	Reports of deforestation in the following concessions: - PT Gawi Bahandep Sawit Mekar	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	Under investigation	30-Nov-19
Kwantas Corporation	Reports of deforestation in the following concessions: - Kwantas Corporation	Mighty Earth Rapid Response Report 17, 21	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	Under investigation	30-Nov-19
NaturAceites	Allegations with respect to human rights	Reuters	Indirect with parent company via third party suppliers/traders.	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.	Monitoring	30-Nov-19
PT. Nafasindo	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Monitoring	30-Nov-19
PT. Bangun Sampurna Lestari	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Monitoring	30-Nov-19
PT. Perkebunan Lembah Bakti I	• Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	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.	Monitoring	30-Nov-19
Kwantas Corporation	Reports of deforestation in the following concessions: - Miracle Harvest Sdn Bhd	Mighty Earth Rapid Response Report 20, 21, 29	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	Under investigation	30-Nov-19
Salim Group	Reports of deforestation in the following concessions: - PT Agro Subur Permai	Mighty Earth Rapid Response Report 20, 21	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	30-Nov-19
Triputra Agro Persada	Reports of deforestation in the following concessions: - PT Berau Karetindo Lestari (area 2)	Mighty Earth Rapid Response Report 2, 16, 19, 20, 21	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	Under investigation	30-Nov-19

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Samling	Reports of peat development in the following concessions: -PT Syarikat Samling Timber Sdn Bhd	Mighty Earth Rapid Response Report 17, 19, 20	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production.	Suspended	30-Nov-19
Salim Group	Reports of deforestation in the following concessions: -PT Bintuni Agro Prima Perkasa	Mighty Earth Rapid Response Report 1	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	30-Nov-19
Salim Group	Reports of deforestation in the following concessions: -PT Duta Rendra Mulya	Mighty Earth Rapid Response Report 2	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	30-Nov-19
Evershine Asset Corporation & Everbright Resources Corporation	Reports of deforestation, peat development, peat forest development, clearance prep/ Stracking lines in the following concessions: - PT Kapuasindo Palm Industry	Mighty Earth Rapid Response Report 5, 6, 12, 17, 20	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	30-Nov-19
Brazil - Twelve properties as listed in the report in the municipalities of Acre, Bahia, Mato Grosso, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 6	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	30-Nov-19
Evershine Asset Corporation / Everbright Resources Corporation	Reports of deforestation in the following concessions: - PT Sentrakarya Manunggal	Mighty Earth Rapid Response Report 19	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	23-Sep-19
Tunas Baru Lampung / Sungai Budi Group	Reports of deforestation in the following concessions: - PT Samora Usaha Jaya (B)	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	23-Sep-19
Brazil - Sixteen properties as listed in the report in the municipalities of Piauí, Bahia, Goiás, Maranhão, Tocantins, Pará, and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 5	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	23-Sep-19
Brazil - Twelve properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Pará	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 4	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	18-Sep-19
Tunas Baru Lampung	Alleged clearance of forested peatlands.	Chain Reaction Research, Greenpeace	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	26-Aug-19
Evershine Asset Corporation & Everbright Resources Corporation	Reports of deforestation in the following concessions: - PT Anugerah Makmur Sejati	Mighty Earth Rapid Response Report 17	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	15-Aug-19
Brazil - Fourteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Roraima	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 2	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	12-Aug-19
Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 3	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	12-Aug-19

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Unknown Group	Reports of deforestation, clearance prep/stacking lines in the following concessions: -PT Krida Dharma Kahuripan	Mighty Earth Rapid Response Report 5, 6, 11, 12	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
Shin Yang group	Reports of deforestation in the following concessions: -LPF/0039 Zedtee SB	Mighty Earth Rapid Response Report 4	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
Unknown Group	Reports of deforestation in the following concessions: -PT Condong Garut	Mighty Earth Rapid Response Report 4	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
Pundi Group	Reports of peat forest development, clearance prep/stacking lines in the following concessions: -PT Pinang Witmas Abadi	Mighty Earth Rapid Response Report 10, 11, 12, 18	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
Musirawas Group	Reports of peat development in the following concessions: -PT Sumur Pandanwangi	Mighty Earth Rapid Response Report 6, 10, 11	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
Brazil - Twelve properties as listed in the report in municipalities of Bahia and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 1	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	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.	Monitoring	13-Jul-19
Pundi	Reports of deforestation in the following concessions: - Pundi Lahan Khatulistiwa (480.49 ha)	Mongabay	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	10-Jul-19
Industria Chiquibul	Allegations of labor rights violations by palm oil producer Chiquibul in Guatemala.	Reuters	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	20-Jun-19