



## Summary - ADM Grievance Log

The document is divided in three sections:

1. 'Summary - ADM Grievance Log' summarizes the accumulated number of grievances linked to ADM's supply chain by key dimensions
2. 'Grievance Log' lists received grievances linked to ADM's supply chain, and their the investigation status and actions taken by ADM
3. 'Appendix' lists ineligible grievances (grievances not linked to ADM Supply Chain)

We will investigate all allegations of non-compliance with our policies in accordance with our protocol and procedures. Concerns can be submitted to [responsibility@adm.com](mailto:responsibility@adm.com).

[ADM's Grievances & Resolutions Procedure](#)

[ADM' Supplier Non-Compliance Procedure](#)

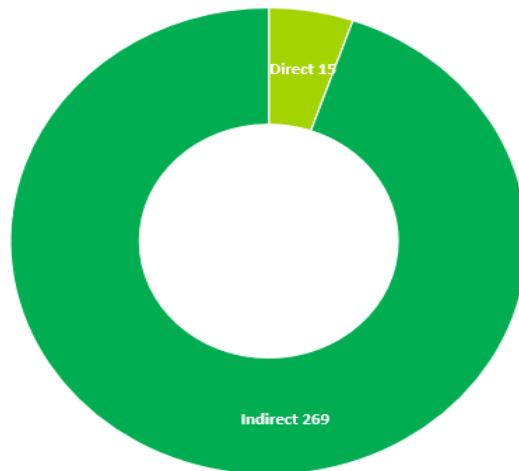
## Grievance Statistics

Accumulated number of grievances linked to ADM's supply chain

### Supply Chain

Direct Suppliers  
Indirect Suppliers

Count of ID



### Commodity

Commodities	Share of Total Grievances
PalmOil	95%
Soybean	3%
Cotton	0%
Peanut	0%
Pineapple	0%
N/A	1%

### Country

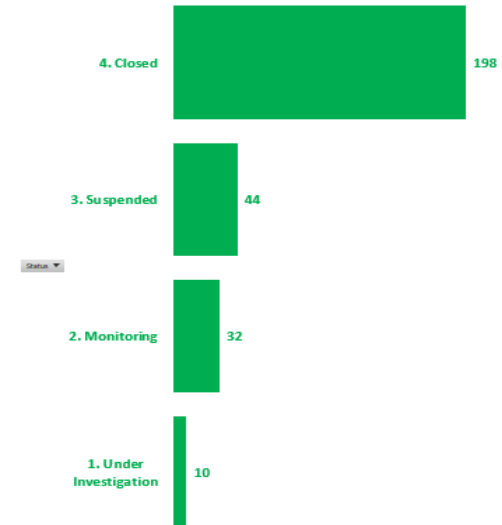
Countries	Share of Total Grievances
Indonesia	72%
Malaysia	19%
Brazil	3%
Guatemala	2%
United States of America	1%
Kenya	0%
N/A	0%
Paraguay	0%
Papua New Guinea	0%
Columbia	1%
Costa Rica	0%
Honduras	0%

### Category

Category	Share of Total Grievances
Environment - Deforestation & Conversion	79%
Human Rights - Land Dispute	9%
Environment and/or Human Rights - Multiple	6%
Environment - Air, Water, Waste Management	3%
Human Rights - Working Conditions	3%

### Status

Count of ID





## Grievance Log

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

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
292	ADM	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Report of deforestation related to soy supply chain in Maranhão and Bahia	Aid Environment	<a href="https://aidenvironment.org/publications/realtime-deforestation-monitoring-report-rdm-21-june-2024/">https://aidenvironment.org/publications/realtime-deforestation-monitoring-report-rdm-21-june-2024/</a>	14-Aug-2024: In July 2024, ADM received the 21 <sup>st</sup> Realtime Deforestation Monitoring report (RDM 21) including nine case studies linking deforestation and fire events to the soy supply chains in Brazil's Cerrado, Pantanal and Amazon biomes. An investigation was carried out into the producers and areas reported to verify whether they were part of the South American supply chain. It was found that of the nine cases listed, two farms were part of ADM's supply chain in Brazil for the 2023/2024 harvest. Environmental regularization guidance was provided to those involved.	4. Closed	11-Apr-25
272	ADM	Soybean - Brazil - Indirect	Environment - Deforestation & Conversion	Reports of fire events for soy and cattle	Aid Environment	Realtime Deforestation Monitoring- soy and cattle supply chains #8  <a href="https://aidenvironment.org/wp-content/uploads/2023/01/LIFE_RDM_Report_8_Dec_2022.pdf">https://aidenvironment.org/wp-content/uploads/2023/01/LIFE_RDM_Report_8_Dec_2022.pdf</a>	28-Feb-2023: In Realtime Deforestation Monitoring - soy and cattle supply chains #8, we received a case involving the Gameleira III farm in the municipality of Confresa/MT, which has more than 8,342 hectares of land embargoed by IBAMA (Brazilian Institute of Environment and Renewable Natural Resources), for initiating a process of deforestation of native vegetation. An investigation of the three producers involved in the case found that only one of them was part of ADM's supply chain in Brazil, specifically in the 2023 and 2024 harvests. Despite the environmental embargo on the area, an analysis of satellite images for the 2024/2025 harvest showed that there was no continuation of the illegal activity, and agricultural management was not carried out in the areas indicated in the report. All producers involved have formal blocks in our purchasing systems, for socio-environmental analysis before any commercial movement.	4. Closed	11-Apr-25
269	Group of SOY farmers/growers in Paraguay	Soybean - Paraguay - Indirect	Human Rights - Land Dispute	Reports of alleged social conflicts between indigenous communities/agrarian reform settlements and SOY farmers.	Global Witness		13-Oct-2022: On August 26th 2022, ADM received from Global Witness an e-mail contact requesting explanation on (7) alleged cases of social conflicts between indigenous communities/agrarian reform settlements and SOY farmers who could be link to ADM in diferent locations in Paraguay.ndigenous related conflicts: Huguá Po'i Loma Piro'y Campo Agua'e Ka'a Poty Colonia Yeruti Agrarian reform settlements conflicts. All suppliers were engaged and interviewed. Interviewees denied the accusations of illegal use of agrochemicals, illegal land grabbing, using violent forced evictions and/or the destruction of community housing and property. Besides the traceability verification, documents and other evidences were presented to ratify the statements. Some did admit that there is tension with local neighboring communities, something also reported by the local media. The lack of VAT contribution to the Paraguayan treasury in FYs 2020 and 2021, mentioned in sections 8(f) and 8(g) of the Global Witness report, is explained by the fact that such contributions are measured as a result of sales in the domestic market of Paraguay that are taxed by VAT. The main activity of ADM Paraguay is the export of commodities, which, like all other exports, is VAT exempt, so it is only natural, under Paraguayan tax system, that no taxpayer whose main sales are made to the international market through exports make any VAT contribution at all.	4. Closed	11-Apr-25
316	Jalan Abesin Group (PT SSS)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Allegations of land clearing	Mighty Earth	Rapid Response Report 48	11-Mar-2025 : ADM adopts a no-buy position on Jalan Abesin Group	3. Suspended	11-Mar-25
315	Pulo Padang Sawit Permai mill	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Allegation of deforestation and conflicts with activists	Upfield		04-Feb-2025: ADM reached out to its direct supplier. ADM direct supplier explained that Pulo Padang Sawit Permai mill successfully demonstrated its legality by providing the required docuements. The Supreme Court of Republic of Indonesia sentenced the nominated activist to 6-month of prison for violence against police officers during a demonstration. The outcome of the trial against the mentioned activist has been reached according to local justice procedures.	2. Monitoring	4-Feb-25
310	DINANT	PalmOil - Honduras - Indirect	Environment and/or Human Rights - Multiple	Allegations of violence and discrimination against local communities	Christliche Initiative Romero e.V.	Palm Oil Report 2024 – In the shadow of the oil palm	31-Jan-2025: ADM contacted its direct supplier who reaffirmed Dinant's commitment to sustainability and Human-Rights. Dinant published the following public statement: <a href="https://www.dinant.com/noticias/dinant-categorically-rejects-the-unfounded-allegations-made-in-the-cir-report-in-the-shade-of-the-oil-palm-oil-palm-report-2024/?lang=en">https://www.dinant.com/noticias/dinant-categorically-rejects-the-unfounded-allegations-made-in-the-cir-report-in-the-shade-of-the-oil-palm-oil-palm-report-2024/?lang=en</a> ADM's direct supplier claims that it is not connected to Dinant's supply chain since January 2024.	4. Closed	31-Jan-25
314	OLEOFLORES SAS	PalmOil - Columbia - Indirect	Environment and/or Human Rights - Multiple	Allegations of social conflict			27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring the investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.	1. Under Investigation	27-Jan-25
313	Compañía Palma Tica SA (subsidiaria de Compañía Industrial Aceitera Coto Cincuenta y Cuatro SA)	PalmOil - Costa Rica - Indirect	Environment - Deforestation & Conversion	Allegations of land clearing			27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.	1. Under Investigation	27-Jan-25
312	NaturAceites SA	PalmOil - Guatemala - Indirect	Environment and/or Human Rights - Multiple	Allegations of social conflict			27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.	1. Under Investigation	27-Jan-25
311	Poligrow Colombia SAS	PalmOil - Columbia - Indirect	Environment - Deforestation & Conversion	Allegations of land clearing			27-Jan-2025: RSPO investigation in progress. ADM will continue monitoring investigation and develop a resolution in line with ADM Non-compliance Supplier protocol.	1. Under Investigation	27-Jan-25

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150	KTS	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - Wawasan Sedar Sdn Bhd	Mighty Earth	Rapid Response Report 25	6-Jan-2025: ADM is currently monitoring the supplier. Via its direct suppliers, ADM obtained a commitment of KTS to comply with NDPE principles. 2023: Supplier was suspended as deforestation continued with 248 ha of forest/peat cleared. This activity was carried out by KTS PELITA (Simunjan) Sdn Bhd and Wawasan Sedar Sdn Bhd. 2016-2022: the total liability of Wawasan Sedar was 532 ha. This liability is for first Binary Plantation (Kuching) Sdn Bhd, KTS PELITA (Simunjan) Sdn Bhd, and Wawasan Sedar Sdn Bhd. ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	2. Monitoring	6-Jan-25
309	Grupo Oleoflores S.A.S.	PalmOil - Columbia - Indirect	Environment and/or Human Rights - Multiple	Allegations with respect to human rights	Forest Peoples Programme		28-Nov-2024: Involved stakeholders submitted a complaint to RSPO. Case in under investigation.	2. Monitoring	28-Nov-24
277	NaturAceites	PalmOil - Guatemala - Indirect	Human Rights - Working Conditions	Allegations with respect to human rights	Christliche Initiative Romero e.V.		14-Nov-2024: According to the NDP monitoring database, Naturaceites currently shows no liability. However, social issues, such as land disputes and worker-related conflicts, have intensified tensions with local communities. Recently, Control Union suspended both of its RSPO P&C certificates. Naturaceites has since appealed, submitting the case to the RSPO complaint panel, which is now under investigation. Based on the latest information, since the appeal is ongoing, we have updated the status to "Monitoring" until a final verdict is issued. 23-Dec-2023: ADM reached out to its supplier for investigation. Our direct supplier provided an official statement by NaturAceites on the allegations raised in February 27, 2023 towards violations to the land rights of the Maya. NaturAceites strongly ratifies its non-involvement or influence in this situation. ADM will continue to monitor the case.	2. Monitoring	14-Nov-24
165	Palm - 129 entries as listed in the report	PalmOil - N/A - Indirect	Environment and/or Human Rights - Multiple	Reports of land disputes, environmental infractions, human rights violations, corruption, and deforestation.	Global Witness		13-Nov-24: Most cases were closed following the investigation. Some remain under investigation. - PT Medco Papua Hijau Selaras : Capitol Group still has unresolved NDPE liabilities, notably from PT Medco Papua Hijau Selaras (MPHS). PT MPHS's HCV status is marked as withdrawn on the HCVRN site, and no updates on recovery plans or NDPE re-entry are available. - PT Erasakti Wiraforestama (Muaro Jambi) : Based on the information available from other grievance dashboard, the child labor issue involving PT Erasakti Wiraforestama (EWF) has reportedly been resolved, yet KTN remains without an NDPE commitment and still has unresolved liabilities. Without a company website, detailed progress on recovery and re-entry actions remains inaccessible. - PT Bumi Sawit Kencana : Capitol Group still has unresolved NDPE liabilities, notably from PT Medco Papua Hijau Selaras (MPHS). PT MPHS's HCV status is marked as withdrawn on the HCVRN site, and no updates on recovery plans or NDPE re-entry are available. - PT Anugerah Langkah Makmur: Based on our database, the liability for this group/company remains unresolved, and no specific updates are available regarding the progress of the given labor issue. - PT Delima Makmur- Based on our database, the liability for this group/company remains unresolved, and no specific updates are available regarding the progress of the given labor issue. 07-Jan-2021: ADM has launched an investigation into the 129 listed cases provided by Global Witness. ADM reached out to its direct supplier for investigation and is requesting information to clarify the situations. Each case will be investigated and published in this grievance register as per grievance protocol. Currently, 26 cases remain under investigation.	1. Under Investigation	13-Nov-24
102	Kwanta Corporation	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Miracle Harvest Sdn Bhd	Mighty Earth	Rapid Response Report 20, 21, 29	13-Nov-2024: Kwanta Corporation Group, through Miracle Harvest, has committed to NDPE since 2018. However, we cannot access their website for updates on corrective actions. Few buyers provide information on this case, and there is no available data regarding Kwanta Corporation's recovery or NDPE re-entry actions. 30-Nov-2019: ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	1. Under Investigation	13-Nov-24
93	Tripura Agro Persada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Berau Karetindo Lestari (area 2)	Mighty Earth	Rapid Response Report 2, 16, 19, 20, 21	13-Nov-2024: PT Berau Karetindo Lestari has no listed grievances on buyer trackers. While TAP committed to NDPE in July 2022, EQ/ID found an outstanding NDPE liability of 5,425 hectares from 2016-2023. TAP appears on the RACP tracker, but no information is available regarding corrective actions or re-entry and recovery programs. 30-Nov-2019: ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation.	1. Under Investigation	13-Nov-24
199	Tayan Bukit Sawit	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Tayan Bukit Sawit - Suspected licensing violations	Global Witness		13-Nov-2024: According to our liability data, PT Tayan Bukit Sawit has no recorded liability. However, the company lacks NDPE, RSPO, and ISPO commitments, and there is limited available information on social issues. Notably, unresolved partnership issues persist, with local cooperatives in Sanggau demanding a 20% revenue share as per regulations. ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they are currently engaging with TBS and awaiting a response. ADM will continue to monitor the case.	2. Monitoring	13-Nov-24
208	Gemilang Jaya Kencana Abadi/ Putra Keritang Sawit	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Putera Keritang Sawit - Waste dumping, purchasing FFB grown illegally	Global Witness		07-Nov-2025: ADM reached out to its direct supplier for investigation. Our direct supplier engaged with PKS and the immediate actions were required to prevent the purchase of illegally grown FFB in the future. Apical together with their consultants conducted a verification visit to PKS. They found that appropriate actions were taken to ensure no illegal FFB sourcing ( <a href="https://www.apicalgroup.com/sustainability/grievances/apical/">https://www.apicalgroup.com/sustainability/grievances/apical/</a> ). PT PKS also attended Apical's Shared Value Program workshop in 2016 and 2017 which aims to assist their suppliers to build their capacity to adopt more sustainable practices. PT PKS has provided traceability data to Apical who continues to monitor their supply chain closely. Jun-2023: AAK immediately reached out to our Tier 1 suppliers and Earthqualizer for investigation. Tier 1 supplier responded with 8 mills (1 identified mill) under Anam Koto Group , TTP 100% for all and no deforestation status is 84-100% and on progress Jun-2023: AAK responded to the article regarding palm sourcing in Tesso Nilo on AAK's website. <a href="https://www.aak.com/news-and-media/press-releases/2023/aaks-response-to-the-article-regarding-palm-sourcing-in-tessa-nilo/">https://www.aak.com/news-and-media/press-releases/2023/aaks-response-to-the-article-regarding-palm-sourcing-in-tessa-nilo/</a> Oct-2023: T1 suppliers confirmed 100% TTP and no sourcing from Tesso Nilo National Park.	2. Monitoring	7-Nov-24

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20	Tsani Hutani Abadi Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Harapan Rimba Jaya	Mighty Earth	Rapid Response Report 2, 5, 9	<p>07-Nov-2024: THA made significant progress on its sustainability program and has been publicly reporting updates though its first two progress reports. THA signed a letter of intent with Yayasan Konservasi Alam Nusantara (YKAN), which is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments.</p> <p>Golden Agri Resources (GAR) has acquired THA (PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya) and are now part of GAR's operations. GAR will follow the RSPO Remediation and Compensations Procedure to address and past deforested lands by the purchased entities in the West Kutai/ East Kalimantan area.</p> <p>THA published 1st progress report re its NDPE implementation. See here <a href="https://bit.ly/37ReGu4">https://bit.ly/37ReGu4</a></p> <p>THA published 2nd progress report <a href="https://bit.ly/2JMPJHZ">https://bit.ly/2JMPJHZ</a></p> <p>GAR announced the acquisition of PT Tsani Hutani Abadi ("THA"), PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya.</p> <p>THA entities have become part of GAR own operations. GAR will no longer continue the re-entry engagement with THA. Instead, as an RSPO-member, GAR will follow the RSPO Remediation and Compensation Procedure (RaCP) to address any past deforestation by the acquired companies and also to comply with the RSPO P&amp;C.</p>	2. Monitoring	7-Nov-24
19	Tsani Hutani Abadi Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Rayatama Jaya	Mighty Earth	Rapid Response Report 2, 5, 6, 9, 14	<p>07-Nov-2024: THA made significant progress on its sustainability program and has been publicly reporting updates though its first two progress reports. THA signed a letter of intent with Yayasan Konservasi Alam Nusantara (YKAN), which is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments.</p> <p>Golden Agri Resources (GAR) has acquired THA (PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya) and are now part of GAR's operations. GAR will follow the RSPO Remediation and Compensations Procedure to address and past deforested lands by the purchased entities in the West Kutai/ East Kalimantan area. THA published 1st progress report re its NDPE implementation. See here <a href="https://bit.ly/37ReGu4">https://bit.ly/37ReGu4</a></p> <p>THA published 2nd progress report <a href="https://bit.ly/2JMPJHZ">https://bit.ly/2JMPJHZ</a></p> <p>GAR announced the acquisition of PT Tsani Hutani Abadi ("THA"), PT Kruing Lestari Jaya, PT Rimba Rayatama Jaya and PT Harapan Rimba Raya.</p> <p>THA entities have become part of GAR own operations. GAR will no longer continue the re-entry engagement with THA. Instead, as an RSPO-member, GAR will follow the RSPO Remediation and Compensation Procedure (RaCP) to address any past deforestation by the acquired companies and also to comply with the RSPO P&amp;C.</p>	2. Monitoring	7-Nov-24
129	Triputra Agro Persada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the Triputra Agro Persada, company: Dwiwira Lestari Jaya.	Mighty Earth	Rapid Response 12	<p>07-Nov-2024: ADM reached out to direct supplier for investigation. ADM obtained clarification from its direct supplier. Those information are available on GAR Internal Monitoring website.</p> <p>30-Aug-2021: TAP updated GAR that PT BBB's revised map was already sent to the RSPO and it was received by the RSPO Membership Executive. TAP also provided GAR with a copy of the receipt dated 23/8/2021 as evidence. Given the evidence, GAR has decided to close this case.</p> <p>11-May-2021: Given the publication of TAP's NDPE commitment, the completion of PT DLJ peer review, the satisfactory clarification for the allegations, and no more deforestation indication detected, we have closed these cases.</p> <p>6-Jul-2021: PT BBB shared the results of the ground-truthing at the location. It was verified that the clearance mentioned in the Rapid Response Report 34 is outside the PT BBB concession boundary (using HGU as reference). Based on the ground-truthing, the cleared area is controlled by the local community and was previously a rubber plantation.</p> <p>14-Dec-2020: in addition to its RSPO commitment, Triputra Agro Persada publicly published NDPE policy at group level.</p>	4. Closed	7-Nov-24
117	Kwantas Corporation	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Kwantas Corporation	Mighty Earth	Rapid Response Report 17, 21	<p>07-Nov-2024: Based on EQ's analysis of the Might Earth report, the deforestation allegation is outside the Kwantas boundary. The case has been clarified with accurate information and resolved.</p>	4. Closed	7-Nov-24
61	Kwantas Corporation	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Kwantas Pelita Plantation	Mighty Earth	Rapid Response Report 14, 17, 20, 26	<p>07-Nov-2024: We were informed that the land in questions is within the parameters of Kwantas Pelita Plantation (Balingan) Sdn Bhd (KPPSB) concession. However, this land does not belong to KPPSB as it has not been surrendered to KPPSB through the Native Customary Right (NCR) Land Aquisition project. The land is in privately owned and KPPSB has not been involved in any clearing activities.</p>	4. Closed	7-Nov-24
3	Austindo Nusantara Jaya Agri (ANJ Group)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Putera Manunggal Perkasa	Mighty Earth	Rapid Response Report 10, 11	<p>07-Nov-2024: Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: <a href="https://bit.ly/2xvqx9N">https://bit.ly/2xvqx9N</a></p> <p>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: <a href="https://anj-group.com/en/sustainability-approach-and-policies">https://anj-group.com/en/sustainability-approach-and-policies</a></p> <p>ANJ has communicated with Mighty Earth and also shared the first progress report of its recovery plan programme: <a href="https://bit.ly/3koUwwH">https://bit.ly/3koUwwH</a></p> <p>The second progress report can be found under: <a href="https://bit.ly/3iqzNtu">https://bit.ly/3iqzNtu</a></p> <p>Based on detailed review of documentation and reports from ANJ, the Wilmar Suspension Committee have given due consideration of this progress and have lifted the suspension on ANJ in March 2021. MusimMas will continue to monitor their progress (April 2021). GAR has changed the engagement status with ANJ into "Monitoring" (closed for monitoring), where GAR will intensely track the progress of the Recovery Plan Implementation and regularly evaluate ANJ's commitment to comply with GARs Social and Environmental Policy (April 2020).</p>	4. Closed	7-Nov-24

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2	Austindo Nusantara Jaya Agri (ANJ Group)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions:	Mighty Earth	Rapid Response Report 3, 4, 6, 8, 10	07-Nov-2024: Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: <a href="https://bit.ly/2xvgx9N">https://bit.ly/2xvgx9N</a> 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: <a href="https://anj-group.com/en/sustainability-approach-and-policies">https://anj-group.com/en/sustainability-approach-and-policies</a> ANJ has communicated with Mighty Earth and also shared the first progress report of its recovery plan programme: <a href="https://bit.ly/3koUwwH">https://bit.ly/3koUwwH</a> The second progress report can be found under: <a href="https://bit.ly/3iqzNtu">https://bit.ly/3iqzNtu</a> Based on detailed review of documentation and reports from ANJ, the Wilmar Suspension Committee have given due consideration of this progress and have lifted the suspension on ANJ in March 2021. MusimMas will continue to monitor their progress (April 2021). GAR has changed the engagement status with ANJ into "Monitoring" (closed for monitoring), where GAR will intensely track the progress of the Recovery Plan Implementation and regularly evaluate ANJ's commitment to comply with GARs Social and Environmental Policy (April 2020).	4. Closed	7-Nov-24
308	Prima Bahagia Permai (Permai Estate), Koperasi Sawit Sejahtera Bersama (Plasma) via Ijm Plantations	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Indirect via third party suppliers/traders.	Grupo Bimbo		4-Nov-2024:The inherited liability from IJM Group (the previous concession owner) is still undergoing a final liability calculation and LUCA assessment under the RACP (RSPO) recovery scheme.	2. Monitoring	4-Nov-24
307	Gawi Bahandep Sawit Mekar via Triputra Agro Persada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Indirect via third party suppliers/traders.	Grupo Bimbo		4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.	4. Closed	4-Nov-24
306	Prima Bahagia Permai (Bahagia Estate) via Ijm Plantations	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Indirect via third party suppliers/traders.	Grupo Bimbo		4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.	4. Closed	4-Nov-24
305	Kalimantan Ria Sejahtera via Agrindo	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Indirect via third party suppliers/traders.	Grupo Bimbo		4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.	4. Closed	4-Nov-24
304	Karya Makmur Langgeng via Bumitama Agri	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Indirect via third party suppliers/traders.	Grupo Bimbo		4-Nov-2024: Our findings indicate that most alerts are false, as they fall outside the concession boundaries and were carried out by the community.	4. Closed	4-Nov-24
302	Rimbunan Hijau Group	PalmOil - Papua New Guinea - Indirect	Environment - Deforestation & Conversion	Land clearing	Mighty Earth	Rapid Response Report 46	22-Oct-2024: Our consultant in charge of investigating on deforestation identified that the area appears to be mixed plantations, with some patches of clearing originating from outside the concession. In order to have certainty on the type of area that was cleared, ADM will diligent an onfield verification with its verification consultant.	2. Monitoring	22-Oct-24
303	Tetangga Akrab	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Land clearing	Mighty Earth	Rapid Response Report 46	22-Oct-2024: ADM's consultancy service investigated on companies'ownership structure and concluded different ownerships than suggested by the grievance. The supply chain analysis found that the indirect supplier of ADM is not supplying to Tetangga Akrab Mill 1 or Mill 2. Finally, the imagery analysis concluded that no clearing was observed within Green DevelopmentMr. Tam Tian Ting's group is not supplying to Tetangga Akrab Mill 1 or Mill 2. In addition, from our high-resolution imagery analysis, we have not observed any clearing within Pure Green Development's concession block.	4. Closed	22-Oct-24
301	PT Mulia Inti Perkasa (Widya Corporation Group)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Land clearing	Upfield		11-Oct-2024: for PT Mulia Inti Perkasa (Widya Corporation Group), Widya Corp issued a Stop Work Order (SWO) on August 20, 2018, and committed to NDPE principles on May 8, 2019. PT MIP submitted its HCV assessment to the HCVRN website in April 2021, with the HCS assessment available on the HCSA website in July 2023. Widya Corp confirmed liability for 2,692.66 ha of forest loss in their concession from 2015 to 2022. They committed to a 5,640 ha village forestry recovery program in Desa Long Ayap, Berau, East Kalimantan.	2. Monitoring	11-Oct-24
299	PT Berau Karetindo Lestari	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Land clearing	Upfield		11-Oct-2024: Engagement with direct supplier in progress.	2. Monitoring	11-Oct-24
298	PT Internusa Jaya Sejahtera Under Indonusa Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Land clearing	Upfield		11-Oct-2024: The company has made a NDPE re-entry commitment by publishing a Stop Work Order (SWO), committing to NDPE principles, conducting HCV-HCS assessments, NDPE time-bound plan and confirming their liability. However, there is no publication yet regarding their recovery progress report.	2. Monitoring	11-Oct-24
297	PT Permata Putera Mandiri (Austindo Nusantara Jaya Group)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Land clearing	Upfield		11-Oct-2024: PT Permata Putera Mandiri (Austindo Nusantara Jaya Group) (Metamani Estate in Starling data) has consistently provided annual progress updates on their recovery efforts since 2020 until 2023.	2. Monitoring	11-Oct-24
300	PT Satria Hupasarana	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Land clearing	Upfield		11-Oct-2024: PT Satria Hupasarana has no liability recorded.	4. Closed	11-Oct-24

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
294	PT Prasetya Mitra Muda: NSS Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Land clearing	Mighty Earth	Rapid Response Report 45	<p>26-Aug-2024: PMM had carried out an HCS/HCV study followed by peer review since 2019 (see <a href="https://bit.ly/2CyAL4N">https://bit.ly/2CyAL4N</a>) and the land development had consistently been based on the "go area" as per the HCSA/HCVRN guidance and therefore GAR's regular monitoring of PMM is also based on the HGU boundary used in the HCS/HCV assessment. Fyi, to be clear, the recent "incident" (the clearance reported by Mighty) occurred in an area that was not included yet in the HCS/HCV study.</p> <p>In a commitment/statement letter to GAR, dated 12 July 2024, PMM admitted the land clearance indications reported by Mighty Earth. The clearance of the area occurred within the license owned by the Company and was part of the process of submission of boundaries and HGU. PMM reiterates that it remains committed to NDPE and the clearance occurred due to miscommunication within PMM's internal team.</p> <p>To mitigate this and demonstrate its commitment, PMM is committed to the following:</p> <ol style="list-style-type: none"> <li>1. The Company will immediately stop land clearing in the Company's concession area which has not yet been studied in HCS/HCV.</li> <li>2. The Company will immediately carry out an (additional) HCS/HCV study in the targeted areas for further development followed by an integrated peer review process by HCVRN.</li> <li>3. Land development will resume after the (additional) HCS/HCV study is completed for the area that is declared as the "go" area. The company will follow the guidance regarding all changes that might occur in the peer process review, if there is any.</li> <li>4. The Company acknowledges the calculation of the Company's responsibility for the aforementioned deforestation and will use it as a basis for a recovery plan program if needed according to the results of the HCS/HCV study.</li> </ol> <p>GAR will keep monitoring the progress</p>	2. Monitoring	26-Aug-24
293	Mutiara Pelita Genaan Plantation – Double Dynasty Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Land clearing	Mighty Earth	Rapid Response Report 45	<p>26-Aug-2024: Double Dynasty submitted an action plan and was approved for resuming business with ADM direct supplier. Double Dynasty is being added to ADM grievance log and its progress towards completion of action plan are monitored.</p>	2. Monitoring	26-Aug-24
295	Del Monte Kenya	Pineapple - Kenya - Direct	Human Rights - Working Conditions	Accusations of violence by supplier's security guards on the pineapple plantations in Kenya	Refresco Beverages UK	<p><a href="https://www.theguardian.com/world/2024/feb/08/del-monte-kenya-representatives-accused-of-seeking-to-cover-up-circumstances-of-mens-deaths">https://www.theguardian.com/world/2024/feb/08/del-monte-kenya-representatives-accused-of-seeking-to-cover-up-circumstances-of-mens-deaths</a>  <a href="https://www.theguardian.com/world/2024/mar/15/i-saw-many-people-suffer-former-del-monte-kenya-guards-speak-of-violence-on-pineapple-farm">https://www.theguardian.com/world/2024/mar/15/i-saw-many-people-suffer-former-del-monte-kenya-guards-speak-of-violence-on-pineapple-farm</a></p>	<p>21-Aug-2024: ADM engaged with Del Monte again and obtained the latest updates on completion of the action plan from July 2024. Significant progress have been declared achieved. For example, the progress report indicates that security services at the plantation have been outsourced.</p> <p>July-2024: Previously to the case being reported in the press, Del Monte has been assessed in context of the ADM Supply Chain Due Diligence program. Risk assessment resulted in High Risk exposure categorization. According to ADM supply chain due diligence process, ADM requested from Del Monte Kenyan a SEDEX SMETA 4-pilars audit. Del Monte Kenya shared their latest audit that was published in January 2023. The audit does not bring critical non-compliances. In the audit, there is non mentions related to accusations of violence by security guards of plantation.</p> <p>As one of our customer raised a grievance in February 2024, ADM engaged with Del Monte to investigate about the situation and collect additional information. Del Monte informed us that an action plan for Del Monte Kenya has been written and is being implemented in partnership with a local partner.</p>	2. Monitoring	21-Aug-24
36	Double Dynasty Holdings Sdn Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation, clearance prep/Stacking line in the following concessions:	Mighty Earth	Rapid Response Report 15, 16, 18, 19, 20, 25	ADM is monitoring the supplier.	2. Monitoring	20-Aug-24
31	Double Dynasty Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of clearance prep./stacking lines in the following concessions: – Radiant Lagoon Sdn Bhd	Mighty Earth	Rapid Response Report 1	ADM is monitoring the supplier.	2. Monitoring	20-Aug-24
152	Astra Agro Lestari	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Reports of land disputes and resistance by local citizens in the following concessions: - PT Mamuang (Passang Kayu)	Walhi		<p>10-Jul-24: Three companies - namely, PT Lestari Tani Teladan, PT Mamuang, and PT Agro Nusa Abadi - operate in South Sulawesi, West Sulawesi, and Central Sulawesi as subsidiaries of ADM's direct supplier. Several critical issues have been identified, including overlapping claims with local communities, allegations of land grabbing, criminalization, concerns regarding plasma partnerships, activities conducted beyond the boundaries of the Cultivation Right (HGU), and operations being conducted without the necessary HGU permits. Our direct supplier has engaged with Astra Agro Lestari on all listed cases and provided us with an update of occurrences. Please see the summary below.</p> <p>PT Mamuang - holds a positive relationship with the local community. They are the legal owners of the land which is shown by the operating permits they hold for the land. Nevertheless, they still engaged and negotiated with the complainants through a mediation process with local authorities. An agreement was not reached and a member of the complainant party engaged in activities that resulted in conviction of criminal charges. This decision was made by legal authorities and courts.</p> <p>PT LTT - additional information has been requested by PT LTT in order to investigate the unverified alleged land grab. It was clarified by PT LTT that there are no outsourcing activities for its operations. Pricing runs in accordance with the regulation set by the Minister of Agriculture of the Republic of Indonesia.</p> <p>PT ANA - all relevant permits are in place and laws complied with. Community rights are always respected, and land tenure is obtained through processes that include the community and agreement is reached.</p> <p>Our direct supplier has explained that they continue to invest resources to try and engage with WALHI/FEO in hope of being able to verify allegations and support efforts to identify, develop, and implement resolutions that are accepted by all parties, but so far without success. P&amp;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: <a href="https://bit.ly/3xtRXTk">https://bit.ly/3xtRXTk</a>.</p> <p>Summary provided by P&amp;G: <a href="https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/pg-executive-summary_assessment-by-econusantara-.final.pdf?sfvrsn=e9df1a0d_2">https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/grievance/pg-executive-summary_assessment-by-econusantara-.final.pdf?sfvrsn=e9df1a0d_2</a></p> <p>P&amp;G will continue to closely monitor developments and continue to report via P&amp;G Palm Grievance Tracker.</p> <p><a href="https://s1.q4cdn.com/695946674/files/doc_downloads/esg/PG_ESG_Palm_Oils_Grievance_Tracker.pdf">https://s1.q4cdn.com/695946674/files/doc_downloads/esg/PG_ESG_Palm_Oils_Grievance_Tracker.pdf</a>.</p>	2. Monitoring	10-Jul-24

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
123	QL Resources Sdn Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Pipit Mutiara Indah	Mighty Earth	Rapid Response 21, 27, 28	<p>10-Jul-2024: ADM reached out to direct supplier for investigation. Our direct supplier informed us that they conducted a field visit to PT PMI in early 2020 to check the compliance on the NDPE policy and the guidance they had provided to QL Resources Group. The group committed to the Development Recovery Plan for Non-Compliant Land Clearing and has displayed considerable progress on its commitments. ADM will continue to monitor the case. QL need to publish recovery area boundary in public domain.</p> <p>Due to non-compliance to the NDPE policy, ADM's direct supplier have ceased sourcing from QL Group of companies where the last purchase was in November 2019. Several meetings have taken place since then to guide QL Group of companies to the compliance of NDPE policy and meeting the re-entry criteria.</p> <p>A field visit to PT PMI was conducted in January 2020 to assess the situation on the ground and develop an action plan for PT PMI to close the gaps identified during the field visit. In April 2020, QL Group met all the criteria stipulated in the re-entry criteria, including their commitment to the Development of Recovery Plan for Non-Compliant Land Clearing to NDPE policy at group level incurred from January 2016 onwards.</p> <p>Based on detailed review of documentation, reports and letter of commitment from QL Group, ADM's direct supplier Suspension Committee have given due consideration of this progress and have lifted the suspension on QL Group in April 2020.</p>	2. Monitoring	10-Jul-24
284	Prison Labor in U.S Supply Chains	N/A - United States of America - Direct	Human Rights - Working Conditions	Reports of elevated risk for human rights violations	Associated Press	<a href="https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e">https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e</a>	<p>8-Jul-2024: ADM has contracted with a prison entity on a rehabilitation program that is designed to allow prisoners with upcoming release dates to begin working to build skills and knowledge that will enable a smooth transition to life after incarceration. These employees receive the same training and safety gear as all employees, and are paid the same rate. We are investigating implementation of the program with ILO guidance to ensure prison labor is voluntary.</p>	1. Under Investigation	8-Jul-24
289	Astra Agro Lestari	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Land grabbing environmental, human rights, and governance violations illegal palm oil cultivation ongoing intimidation criminalization of environmental human rights defenders operations without required permits.	Friends of the Earth	<a href="https://foe.org/wp-content/uploads/2024/06/AAL_Cultivating_Conflict_Eng_final.pdf">https://foe.org/wp-content/uploads/2024/06/AAL_Cultivating_Conflict_Eng_final.pdf</a>	<p>8-Jul-2024: Our direct suppliers are engaging with AAL to implement appropriate measure to improve practices at AAL concessions, and make sure the situation on site is not violating any of ADM policies. A well-directed and measurable plan, agreed upon by all parties, will help to resolve disputes and conflicts.</p> <p>1- Concession permits within forest areas and deforestation The presence of concessions in forest areas does not necessarily imply deforestation, as the status of forest areas does not always mean that the area is still forested. If verified that AAL's subsidiaries indeed have concessions overlapping with forest areas, the regulation on encroachment as stipulated in Law No. 6 of 2023 on Job Creation will be applied to these subsidiaries. The biggest challenge is the almost complete lack of public access to this information, as all details of the process and information are managed by the government and are exempt from public disclosure. The government only provides general information such as the number of companies and the area included in categories of articles 110A and 110B.</p> <p>2- Implementation of FPIC mechanisms as an initial remediation process The argument by AAL and EcoNusantara that the absence of an FPIC mechanism at the start of company operations renders FPIC irrelevant now is incorrect, as Indonesian civil law principles and Supreme Court jurisprudence allow for this to be addressed.</p> <p>3- Repeated intimidation of communities In its report, FoE reveals that two women from Rio Mukti Village have experienced repeated intimidation by AAL staff in the field, who questioned the reason for their opposition and pressured them to retract their statements and demands. This repeats various instances of intimidation and criminalization previously carried out by AAL's subsidiaries in the past.</p>	2. Monitoring	8-Jul-24
288	Abdi Budi Mulia	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Allegations of land clearing	Mighty Earth	Rapid Response Report 44	<p>We have been engaging with our direct supplier and it was determined that the land clearing was carried out by local communities, in areas not in control of ADM's supplier, for the purpose of mix agriculture farming, including paddy, corn as well as oil palm cultivation. PT KHS carried out plasma development since January 2024 following pressure received by both local communities and the local government.</p> <p>Nevertheless, PT KHS has ceased all land clearing activities since May 2024 to mitigate risk of potential deforestation and has committed to conduct relevant assessments, including integrated HCV-HCSA assessment, before resuming plasma development. This decision and action is prior to the release of Mighty Earth Report 44.</p>	4. Closed	8-Jul-24
286	ADM	Soybean - Brazil - Indirect	Environment - Deforestation & Conversion	Report of deforestation related to soy	Aid Environment		<p>In May 2024, ADM received the 20<sup>th</sup> Realtime Deforestation Monitoring (RDM 20) report including nine case studies linking deforestation and fire events to the soy and cattle supply chains in Brazil's Cerrado, Pantanal and Amazon biomes.</p>	4. Closed	8-Jul-24
285	SLC Agricola	Cotton - Brazil - Direct	Environment and/or Human Rights - Multiple	Reports of human rights and environmental violations	EarthSight		<p>ADM engaged with SLC Agricola who is an active supplier of ADM to have additional information regarding a report publicly available in the media by an NGO with alleged Human Rights and environmental issues linked to farms operated by SLC Agricola. In less than 24 hours, SLC responded with documents and evidence which were also publicly available and accessible to the general public in different medias. All areas in operation have been legally cleared under the Brazilian Forest Code legislation and have the proper licenses. Regarding the area in the Capão Modesto region in Bahia, which the Report claims to have a land dispute, SLC explained that they have a land lease of a farm where they plant cotton which has its legal reserve allocated in a different property/area located 40km away from where they operate (as the Forest code from the country legislation allows). The NGO Report claims that this area, where the legal reserve is allocated, is linked to human rights conflicts as there is a dispute on property rights. SLC presented the documents of the land titles and licenses of the land in dispute, demonstrating who is the rightful owner of the land. About the deforestation accusation of over 1000 hectares in Fazenda Palmares, the company presented evidence that this area of native vegetation, which was never - and still is not - in production, was affected by a natural fire in 2022, something common in the dry season in the Cerrado biome. They have presented documents showing that this unintentional fire, which was fought and controlled by them, was reported to the local environmental authorities. Furthermore, the company has shown that the area is recovering its original native vegetation and is not being used for agricultural purposes.</p>	4. Closed	8-Jul-24

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
283	Prison Labor in U.S Supply Chains	N/A - United States of America - Direct	Human Rights - Working Conditions	Reports of elevated risk for human rights violations	Associated Press	<a href="https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e">https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e</a>	8-Jul-2024: ADM received an inquiry from the Associated Press. The reporter noted elevated risks for human rights violations in various U.S supply chains linked to prison labor. ADM began looking into its supply chains for instances of violations to its Human Rights Policy. ADM has identified a direct supplier who has not been able to provide sufficient documentation to confirm all conditions specified by the ILO for voluntary prison labor have been satisfied. Until such evidence is provided, ADM has ceased doing business.	4. Closed	8-Jul-24
282	Prison Labor in Southeast U.S Peanut Supply Chain	Peanut - United States of America - Indirect	Human Rights - Working Conditions	Reports of elevated risk for human rights violations	Associated Press	<a href="https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e">https://apnews.com/article/prison-to-plate-inmate-labor-investigation-c6f0eb4747963283316e494eadf08c4e</a>	8-Jul-2024: ADM received an inquiry from the Associated Press. The reporter linked prison labor to ADM's subsidiary, Golden Peanut. ADM communicated to the AP and its customers that our policies explicitly prohibit forced labor of any kind in our operations and supply chains. The supplier in question is indirectly linked to Golden Peanut through a 3rd party commissioned agent. The supplier has not been able to provide sufficient documentation to confirm all conditions specified by the ILO for voluntary prison labor have been satisfied. ADM has communicated to our direct supplier that we are unable to accept grain from the prison until such evidence is provided.	4. Closed	8-Jul-24
290	ADM	Soybean - Brazil - Indirect	Human Rights - Land Dispute	Soy supply chain issue: Sourcing grains indirectly grown illegally on Indigenous territory in South of Brazil	Reuters		ADM engaged with suppliers mentioned and both confirmed there was no commercial relationship or soy sourced from the areas mentioned in the report we received. It is important to note that those two areas are on a process to "officially" become Indigenous Reservations under local legislation, so there are still private areas farming soy legally today within the boundaries of the area that eventually may become an Indigenous Reservation. The COOPs have an extensive network of country elevators spread throughout the state. 1 COOP has a country elevator close to these 2 areas.	4. Closed	12-Jun-24
210	Sime Darby	PalmOil - Malaysia - Direct	Human Rights - Working Conditions	Reports of human rights violations	U.S. Customs and Border Protection		ADM reached out to direct supplier for investigation. Sime Darby (SD) is in the process of clarifying with the U.S. Customs and Border Protection (CBP) what the exact allegations against them are in order to be able to rectify what has caused the implementation of the Withhold Release Order (WRO). SD has openly engaged with the CBP and Liberty Shared, the issuers of the petition to the CBP, and provided a list of their existing practices in relation to the areas of concern outlined in the petition: <a href="https://bit.ly/3ogrwxq">https://bit.ly/3ogrwxq</a> SD has been reporting on the progress of its Human Rights and Labor Program for a number of years: <a href="https://bit.ly/3Mmh5jO">https://bit.ly/3Mmh5jO</a> PwC was appointed to strengthen SD's human rights compliance. In order to maintain its RSPO certification, SD must also undergo annual third party audits, which include stringent requirements on labor practices. The latest audit findings of the RSPO did not generate any red flags against SD. However, the RSPO will also conduct an investigation: <a href="https://bit.ly/39wX1wB">https://bit.ly/39wX1wB</a> SD appointed Impact Ltd. to conduct a third party labor assessment of their Malaysian plantations. The outcome of this assessment and the resulting corrective action plan to address issues found shall be a key step towards lifting the CBP's WRO.	4. Closed	17-Apr-24
189	Sumber Jaya Indahnusa	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Kota Tergah - Land dispute, indigenous persons affected	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that land compensation for the community has been carried out. The HGU permit expires in 2021, our direct supplier recommends that 500 ha of land claimed by the Malay community be used as plasma as a conflict resolution effort, even though the company had previously provided plasma with an area of approximately 5000 ha. The company wants to maintain the 500 ha because the land is in the HGU which will be extended. Therefore our direct supplier also suggests that SJI identify the history of land ownership of 500 ha when it was first obtained and identification of Malay tribes about their relationship with the original owner of the land (from which tribe, is it recognized by the district / provincial customary institutions) and conduct participatory CSR (social) programme analysis with communities affected by company activities.	4. Closed	17-Apr-24
185	Garuda Food/ Garuda Bumi Perkasa	N/A - Indonesia - Indirect	Human Rights - Land Dispute	Garuda Bumi Perkasa - Land dispute, waste dumping	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2017. Based on the assessment, an action plan and a number of development programs were developed. The main problem that has emerged in publicly reported information (which has been confirmed) is complaints from residents regarding environmental issues. Tracing results with stakeholders indicated that the main problem was poor social relations with the village head, who played a role in the Mesuji area. The mill has fixed the problem and currently relations with the community are quite good.	4. Closed	17-Apr-24
179	Bengkulu Sawit Lestari	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Bengkulu Sawit Lestari - Land dispute, waste dumping	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. The land dispute is being verified in the field. The location permit has indeed expired, but it has no impact on operations because they already have an IUPB. A location permit is only a preliminary permit from the regional government to initiate the compensation process. Currently in the verification process with the village head and local community leaders. The audit team is still on the plantation. So the results of the investigation are not final. Our direct supplier also informed us that the news on waste was incorrect. Based on the Decree of the Minister of Environment and Forestry no SK.696 / Menlhk / Setjen / Kum.1 / 12/2017 dated 15 December 2017, the results of the performance improvement assessment (Proper) program have been issued and PT. BSL gets the blue proper. PT BSL mill is a is used as a pilot in South Bengkulu regarding waste management. After the news appeared in the newspaper, the BSL team contacted the local environmental agency. The results of the examination found that the upstream and downstream river water in the waste storage outlet was in line with the standard.	4. Closed	17-Apr-24
115	PT.Socfindo	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		ADM conducted a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool. Socfindo (Aek Loba) and Socfindo (Pks Tanah Gambus) both have a low overall threat index value. ADM will continue to monitor the development of these values.	4. Closed	17-Apr-24



ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
228	PT Inti Nusa Sejahtera/ PT Capitol	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - PT Mitra Austral Sejahtera	Forest Peoples Programme	Demanding accountability	The case is currently under review by the RSPO Complaints Panel. ADM recognizes and heeds the RSPO's Complaints System and is monitoring the outcome through the RSPO case tracker: <a href="https://rspo.my.site.com/Complaint/s/case/50090000028ErzsAAC/detail">https://rspo.my.site.com/Complaint/s/case/50090000028ErzsAAC/detail</a> . CP's decision letter has been furnished: <a href="https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000zdol/6KzFMyMgMQbXU_ru1JUXMGS7V1pdXeTQQCbU.QgkGIY">https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000zdol/6KzFMyMgMQbXU_ru1JUXMGS7V1pdXeTQQCbU.QgkGIY</a> The Appeals Panel's decision letter is delivered: <a href="https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/GB00000109qs/AgKNKsTq1F.0g6hyYhLIVDJ59b3BfCPsH7vaiQyA8s">https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/GB00000109qs/AgKNKsTq1F.0g6hyYhLIVDJ59b3BfCPsH7vaiQyA8s</a>	2. Monitoring	31-Jan-24
39	Ta Ann Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Ladang Selezu Sdn Bhd	Mighty Earth	Rapid Response Report 15	Our supplier is investigating the allegation and a field verification on the deforestation allegation in the week of 23rd July. Moratorium of land clearing has been put in place while investigation is ongoing. A field assessment was done by the supplier's team and it was verified that clearing activities were done outside the concession boundaries of Ladang Selezu. Ta Ann Group is suspended due to unresolved case.	3. Suspended	31-Jan-24
281	First Resources	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation claiming connection Fangiono Agro Plantation (FAP) Agri, New Borneo and Clandry Anky Abadi (CAA)	The Gecko Project		Based on an investigation carried out, it was confirmed that First resources, CAA, FAP and New Borneo are separate entities. First Resources mentioned that FAP Agri is a separated entity but one of First Resources suppliers. FAP Agri has been demonstrating good commitment to sustainability with HCV Assessment and compliance with First-Resources' NDPE policy. First Resources claimed that it operates respectfully of its NDPE policy and RSPO is an additional proof of non-deforestation.	4. Closed	31-Jan-24
279	Mentari Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: -PT Alamsari Lestari	Mighty Earth	Rapid Response 42	ADM reached out to its supplier for investigation. ADM identified that PT Risman Scham Palm Indonesia is potentially linked through a indirect supplier. On April 5, 2022, according Permata Hijau Group grievance website received information that PT. Alamsari Lestari, owned by Mentari Group, was allegedly involved in clearing 6 hectares of peat forest and developing 45 hectares of peatland in January and February 2022. PHG engaged with Mentari Group on April 6, 2022, seeking clarification. On June 15, 2022, Mentari Group confirmed that PT. Alamsari Lestari's concession included peatland and was acquired in 2019. Mentari Group explained that the land clearing was a recovery/replanting of unproductive areas previously cleared and planted by the previous owner but poorly managed. PT ASL gave several statements on the progress that has been made regarding to the case, such as conducted a moratorium, commitment to NDPE, HCV/HCSA and soli survey. ADM has reached out to direct supplier to request evidence on the implementation of such claims, to keep monitoring for evidence of solved land conflicts with local communities and to suspend sourcing from PT Risman Scham Palm.	3. Suspended	29-Dec-23
241	Sumber Tani Agung Tbk	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	The company is sourcing from PT Sawit Sukses Sejati, who allegedly violates NDPE policies.	Mighty Earth	Rapid Response Report 39	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT Sawit Sukses Sejati (SSS) used to supply FFB to their supplier, PT Sumber Tani Agung (STA) but they are no longer a consistent supplier to PT STA after they built their own mill in 2022. There were some ad hoc FFB delivery to STA in 2022 when PT SSS's mill running into operational issues. When the allegation of deforestation on PT SSS was brought to PT STA's attention, PT STA has immediately shared the Rapid Response report 39 with PT SSS for investigation. In the meantime, PT STA has ceased sourcing from PT SSS. PT Teguhkarsa Wanalestari, PT Asia Sawit Lestari and PT Prima Mas lestari have denied to be associated or buying from PT SSS. It was found that ADM is linked to Sikarakara mill. Sikarakara mill, PT Rimba Mujur Mahkota/Pasifik Agro Sentosa was allegedly sourcing from PT SSS. Sikarakara mill/PT Rimba Mujur Mahkota/Pasifik Agro Sentosa group have confirmed that PT SSS is no longer in their supply chain (last purchase was in January 2022).	4. Closed	29-Dec-23
240	Jernih Kemboja	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concession: - PTD 1815	Mighty Earth	Rapid Response Report 38, 40	ADM reached out to its direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation. Effective March 31, 2022, our direct supplier suspend Jernih Kemboja Sdn. Bhd from its supply chain following evidence of deforestation in Malaysia obtained via satellite imagery. Our direct suppliers began an engagement process with Jernih Kemboja Sdn. Bhd to support their efforts that meet our policies standards. Sep-22:Concluded investigations have confirmed that there is non-compliance to the No Deforestation commitment in the NDPE Policy. Therefore, our direct suppliers have stop purchasing from Jernih Kemboja from September-22 onwards and will continue engaging with them to meet the requirements in their re-entry criteria. Our direct supplier has also updated and registered this case on their public grievance log. Kindly refer here for more information: <a href="https://www.wilmar-international.com/sustainability/grievance-procedure">https://www.wilmar-international.com/sustainability/grievance-procedure</a>	4. Closed	29-Dec-23
220	Wings Agro	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Gawi Makmur Kalimantan	Mighty Earth	Rapid Response Report 34	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the Wings Group has reiterated ist commitment to land development guided by and in adherence with HCV and HCS assessments. Direct supplier is no longer sourcing from PT GWK or sourcing from Wings Agro. Dec-21: No purchase data as of H2 2021 traceability data. Based on an analysis carried out, Wings Agro issued an NPDE commitment and did not carry out deforestation in 2023.	4. Closed	29-Dec-23
217	First Resources	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Aid Environment		The case is currently under review by the RSPO Complaints Panel. ADM recognizes and heeds the RSPO's Complaints System and is monitoring the outcome through the RSPO case tracker: <a href="https://sforce.co/3wlmxhf">https://sforce.co/3wlmxhf</a> The Secretariat is preparing the Briefing Note along with the full chronology of the recent developments. The CP has deliberated the Complaint and the Decision Letter has been furnished to the parties.	4. Closed	29-Dec-23
216	Bumi Gading Prima (BGP)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Bumi Agro	Mighty Earth	Rapid Response Report 33	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that they have reached out PT Bumi Agro Prima (BAP). PT BAP agreed to a land clearing moratorium and have signed a commitment stating so: <a href="https://bit.ly/2PVdW2f">https://bit.ly/2PVdW2f</a> . Given the moratorium commitment, PT BAP commitment letter on the moratorium here <a href="https://bit.ly/2PVdW2f">https://bit.ly/2PVdW2f</a> . Given the moratorium commitment, our direct supplier has decided to close this case for monitoring. In 2023, Mulia Gading Mas Group did not carry out deforestation, Group has been considered for removal from the suspended list.	4. Closed	29-Dec-23

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
153	Group Olmeca	PalmOil - Guatemala - Indirect	Environment and/or Human Rights - Multiple	Reports of human rights violations - Reforestadora de Palma de Peten SA (REPSA)	RAN - Rainforest Action Network		The social issues that occurred at REPSA have been resolved, REPSA has been considered for removal from the suspended list in May 2022. Previously, ADM was adopting a no buy position on the company.	4. Closed	29-Dec-23
116	NaturAceites	PalmOil - Guatemala - Indirect	Human Rights - Working Conditions	Allegations with respect to human rights	Reuters		ADM reached out to direct supplier for investigation. Our direct supplier informed us that he immediately engaged Naturaceites following the allegations. To date, evaluations conducted by neutral third parties have shown that Naturaceites has been in compliance with the sustainable palm oil policy from our supplier.	4. Closed	29-Dec-23
107	PT. Bumi Daya Agrotamas	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		From 2016-2023, ADM conducted an investigation led by an independant consultat which concluded that PT BDA did not carry out deforestation.	4. Closed	29-Dec-23
70	Pinehill Pacific Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Makmur Jaya Malindo	Mighty Earth	Rapid Response Report 18, 19, 27, 28	ADM reached out to direct supplier for investigation. We were informed that Pinehill Pacific Bhd has divested their Malaysian operations and they are no longer associated with PT MJM. Jun-22: No purchase reflected as of H2 2021 data. Based on an analysis of the Might Earth report, PT Makmur Jaya Malindo is a subsidiary of Pinehill Pacific Bhd. PT Makmur Jaya Malindo has no liability because it did not carry out deforestation in 2016-2023.	4. Closed	29-Dec-23
26	Unknown Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation, clearance prep.Stracking lines in the following concessions: -PT Krida Dharma Kahuripan	Mighty Earth	Rapid Response Report 5, 6, 11, 12	PT Krida Dharma Kahuripan did not carry out deforestation in 2016-2023. PT Krida Dharma Kahuripan has been considered for removal from the suspended list. Previously, ADM was adopting a no buy position on the company.	4. Closed	29-Dec-23
24	Unknown Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Condong Garut	Mighty Earth	Rapid Response Report 4	PT Condong Garut is owned by Mr. Hutomo Mandala Putra. No deforestation was carried out from 2016-2023. Company has been considered for removal from the suspended list. Previously, ADM was adopting a no by position on the company.	4. Closed	29-Dec-23
280	Wings Agro	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and peat development in the following concession: - PT GAWI Makmur Kalimantan	Mighty Earth	Rapid Response 34	ADM's direct supplier confirmed is no longer from PT Gawi Makmur Kalimantan and Wings Agro group. There is no linkage to ADM since 2021 Q4. Based on an analysis carried out, Wings Agro issued an NPDE commitment and did not carry out deforestation in 2023.	4. Closed	28-Dec-23
276	Runding Putra Persada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Mahmudin plantation	RAN - Rainforest Action Network		ADM reached out to its direct supplier for investigation. Our direct supplier informed that PT RPP has achieved 100% TTP and they are able to check the sourcing information. Our indirect supplier was linked to Mahmudin plantation through their FFB supplier. A series of meetings and engagement with PT RPP was carried out thereafter. A field verification has been carried from 7 to 15 November 2022 to verify the allegation and support the development of action plan to address the issues identified. The field visit concluded Mahmudin plantation has a certificate of ownership (SHM) covering an area of 29 hectares. There was no clear data provided in the report linking the non-compliant smallholder land parcels to the palm oil dealer that supplies PT RPP. The outcome of the investigation has been shared, discussing the action plan with RAN on 1 December 2022. The final field verification report has also been shared with RAN on 21 December 2022. In May 2023, a follow up field visit was carried out. PT RPP has achieved 94% Traceability to Plantation (TtP) and its staff have been trained on the traceability system. After a delayed start on the traceability mapping process due to unforeseen circumstances, the traceability work on CV BI's and Mr Mahmudin's suppliers began in March and May 2023 respectively. Thus, a timeline for 100% TtP to September 2023 has been recieved. During this visit, the field team also discussed with Mr. Mahmudin on the progress of the land release of the 4 hectares. In June 2023, a meeting with Balai Konservasi & Sumber Daya Alam, BKSDA (Agency of Conservation and Natural Resources) took place as the authority for management and monitoring of RSWR, and Balai Pemantapan Kawasan Hutan, BPKH (Agency of Forest Area Consolidation Center) as the authority for boundary marking of RSWR, with the aim to understand the management and monitoring of RSWR, and process of releasing land occupied by community within the RSWR. Additionally, another follow up field visit was carried out. Mr. Mahmudin was not available to meet with field team during this field visit. The field team was later informed that Mr. Mahmudin was not willing to sign the commitment letter to release the 4 hectares. Consequently, PT RPP and CV BI have issued a statement on 13 July 2023 to exclude Mr. Mahmudin from their supply chain. With this latest development, Our direct supplier included Mr. Mahmudin on its list of "high risk" FFB supplier, where indirect suppliers operating within the 50km radius of the Leuser Ecosystem will be notified on the development of this case. Mr. Mahmudin's FFB will only be allowed to enter their supply chain when the case is resolved to our satisfaction.	2. Monitoring	30-Aug-23
278	AAK/AarhusKarlshamn AB	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: -Tesso Nilo Mills	Upfield / Sveriges Natur		ADM reached out to its supplier for investigation. Our direct supplier provided information on the allegations first raised in 2018. Sveriges Natur's reported a list of 20 mills that extract oil from illegally-grown palm fruit inside Tesso Nilo, which is then shipped to customers worldwide. According to the report each mill supplies palm oil to a slew of international businesses, including AAK. Our direct supplier has confirmed that they don't source directly from Tesso Nilo landscape. In 2018, all mills committed to either blacklisting or strengthening monitoring against trucks and dealers in the report. In line with our expectations of engaging in high priority landscapes, we advocate for our direct suppliers to collect traceability to plantation data in these areas.They have commitments and SOPs against sourcing from illegal concessions in the landscape and will socialize them again with suppliers. In line with our expectations of engaging in high priority landscapes, we advocate for our direct suppliers to collect traceability to plantation data in these areas. (July 2018) Our trading partners confirmed they do not source from the Tesso Nilo park and the surrounding National parks. Supplying mills to our trading partners (mills mentioned in the EOF report) have been visited by our trading partners and are undergoing the ART transformation program as well as a traceability to plantation program. Our direct supplier initiated dialogues with suppliers after receiving the report, clarifying that they do not directly purchase Fresh Fruit Bunches (FFB) from the mentioned area. They expect their crude palm oil suppliers to comply with their Sustainability Policy. Field audits will be conducted, and a corrective action plan will be developed based on the findings. Our direct supplier attended multi-stakeholder meetings to discuss the establishment of a task force to address illegal farming in the park.	1. Under Investigation	3-Jul-23

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
164	FGV Holdings Berhad and its subsidiaries and joint ventures	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and human rights violations	U.S. Customs and Border Protection		<p>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):</p> <p><a href="https://www.fgvholdings.com/wp-content/uploads/2020/03/Background-and-Summary-of-FGV-Action-Plan-2020.pdf">https://www.fgvholdings.com/wp-content/uploads/2020/03/Background-and-Summary-of-FGV-Action-Plan-2020.pdf</a></p> <p><a href="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">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</a></p> <p>The U.S. Customs and Border Protection (CBP) placed a Withhold Release Order (WRO) on palm oil products produced by FGV at all U.S. ports of entry. In order to revoke WRO measure, FGV has revised its Group Sustainability Policy to be more encompassing and further align with the FLA's Workplace Code of Conduct and the company has also been involved in further verification processes and audits. Please the link for updates: <a href="https://www.fgvholdings.com/wp-content/uploads/2021/01/FGV-Sustainability-Updates-January-2021.pdf">https://www.fgvholdings.com/wp-content/uploads/2021/01/FGV-Sustainability-Updates-January-2021.pdf</a></p> <p>On 1 July 2021, FGV published an update on its sustainability efforts.<a href="https://www.fgvholdings.com/wp-content/uploads/2021/07/FGV-Sustainability-Updates-1-July-2021.pdf">https://www.fgvholdings.com/wp-content/uploads/2021/07/FGV-Sustainability-Updates-1-July-2021.pdf</a>. A further statement on FGV's progress in addressing the WRO was published on 18 June 2021. FGV reiterated its sustainability commitments and highlighted several initiatives that are being implemented, focused on improving its migrant worker recruitment process, developing human rights capacity building and training programmes, as well as strengthening its grievance mechanisms and enhancing labour monitoring systems. <a href="https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1">https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1</a>. On 16 November 2021, FGV announced that following a review of proposals from several organisations, the company had finalised the appointment of ELEVATE <a href="https://www.fgvholdings.com/press_release/fgvs-update-on-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1">https://www.fgvholdings.com/press_release/fgvs-update-on-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1</a></p> <p>On 28 February, 2023, FGV issued a press release stating that they have concluded its on-site assessments and FGV is implementing recommendations from their supply chain service provider and anticipated to submit the final report to CBP in the near future. Our direct supplier is regularly communicating with FGV to monitor their progress.</p>	2. Monitoring	31-May-23
234	Padasa Enam Utama	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - Koto Kampar	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara		<p>ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on both allegations.</p> <p>1) Suspected development of plantations in the convertible production forest (HPK) and protected forest (HL) in Koto Kampar - our direct supplier informed us that this is a legacy issue. PT PEU (Koto Kampar) had obtained legal permits for its land and operations long before the area was categorized/designated as forest zone. PT PEU is a holder of an HGU title No. 14/HGU/BPN/92 issued by the National Land Agency in 1992. HGU is the highest "rank/strata" of land title a palm oil company can possibly obtain. The government (National Land Agency) wouldn't have granted the HGU title for PT PEU if there had been a forest one overlapping issue. PT PEU is also a holder of ISPO certificate. Legality is the most important aspect in ISPO's principles and Criteria. See Principle No.1 in the table here: <a href="https://peraturan.go.id/common/dokumen/bn/2020/bn1377-2020.pdf">https://peraturan.go.id/common/dokumen/bn/2020/bn1377-2020.pdf</a></p> <p>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.</p> <p>As the pandemic worsened in Q1 2022, PEU are still trying to agree on a schedule for a verification visit. Sep-22: A site visit has been carried to PT PEU and are currently reviewing the result of the site visit and preparing the report.</p> <p>With the spirit of sincerity and presumption of innocence, the evidence provided in the report will be studied, discuss the issue with PT PEU management, do the necessary verification/assessment process and come up with a time-bound action plan. The result of the whole process will become the basis for T1 supplier's decision / position on further commercial relationship with PT PEU.</p>	2. Monitoring	8-May-23
195	Julong	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Rezeki Kencana - Land dispute, waste dumping	Global Witness		<p>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.</p> <p>Overall, based on the visit, our direct supplier said that waste is fairly well managed. However, some follow up actions were agreed upon:</p> <p>Appoint and assign a person in charge to carry out environmental management and monitoring at the unit level;</p> <p>File records in LB3 warehouse;</p> <p>Strengthen efforts to manage empty bunches and solid citation;</p> <p>Our direct supplier continues to engage PT RK and monitor the progress. Our direct supplier has stop purchasing from PT Rezeki Kencana and there is currently no links to Rezeki Kencana. Julong group/Rezeki has re-entered our supply chain. Our direct supplier engaged our T1 supplier &amp; are pending their response from further investigations.</p> <p>Our indirect supplier adopted.</p>	2. Monitoring	8-May-23
236	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment and/or Human Rights - Multiple	Reports of various NDPE violations including environmental degradation, deforestation, and human rights and health and safety	Global Witness	The True Price of Palm Oil	Based on a statement from one of NDPE traders, it has been verified that the land clearing is not related to oil palm development.	2. Monitoring	29-Mar-23

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
231	PT Tasma Puja	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - Batang Cenaku	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara		<p>ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on the allegations:</p> <p>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.</p> <p>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%.</p> <p>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. A verification visit was carried out to Tasma Puja's Batang Cenaku mill as planned. Summary of the verification visit is available: <a href="https://bit.ly/3nGm7x6">https://bit.ly/3nGm7x6</a>.</p> <p>For more info: <a href="https://www.fgvholdings.com/wp-content/uploads/2020/10/Updates-on-the-CBP-WRO.pdf">https://www.fgvholdings.com/wp-content/uploads/2020/10/Updates-on-the-CBP-WRO.pdf</a></p>	2. Monitoring	29-Mar-23
209	Astra Agro Lestari	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Sari Aditya Loka 1 - Land dispute, evictions, violent confrontation, indigenous persons affected	Global Witness		<p>ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Covid-19 protocol was to ensure only personell of PT SAL entered the premises. A confrontation resulted in unrest, upon which local police was called to avoid any further conflict. Mediation efforts are ongoing, and PT SAL has been providing assistance to the community and the Orang Rimba peoples in the surrounding area. AAL's public response can be found under: <a href="https://bit.ly/2Ub1GfU">https://bit.ly/2Ub1GfU</a></p> <p>In AAL Response letter, it stated that AAL has provided assistance in form of education, healthcare, and economic opportunities to the orang Rimba dating back to 2001 so as to improve their quality of life. AAL is also committed to a NDPE policy and publishes its sustainability report both annually and quarterly which is publicly available.</p>	2. Monitoring	29-Mar-23
223	Chora Agro Resources	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Reports of NDPE violations in terms of land rights, labor rights, and environmental concerns in the following concession: - PT Mitra Abadimas Sejahtera	Local community stakeholders, cooperatives, and oil palm farmers.		<p>Following ADM's investigation, it appears PT MAS is operating legally as they have already obtained all legal permits, including location permit, plantation business permit (IUP) and land use permit (Hak Guna Usaha, HGU). They have also fulfilled their plasma obligations as well as provided compensation for land acquisition to the previous landowner. It is important to note that there are no community settlements, buildings, graves and community houses within the boundaries of PT MAS's IUP and HGU. On the matter of labour conditions, majority of workers are from local communities of Subah sub-district and they appeared to have good relationship with PT MAS. PT MAS has also provided documentation proof that their workers welfare is protected, including insurance coverage.</p>	4. Closed	29-Mar-23
273	Sarawak Oil Palm/Shin Yang	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and peat development in the following concession: - LPF/0018	Mighty Earth	Rapid Response 15,18,19,20,21	ADM adopts a no-buy position for this supplier.	3. Suspended	27-Feb-23
88	Tunas Baru Lampung / Sungai Budi Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Samora Usaha Jaya (B)	Mighty Earth	Rapid Response 19 & Chain Reaction Research	ADM adopts a no-buy position for this supplier.	3. Suspended	27-Feb-23
113	PT. Bangun Sampurna Lestari	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		<p>ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT BSL has conducted a verification based on the coordinates provided by RAN and found the indirect supplier is not in line with the NDPE policy. Therefore, PT BSL has decided to stop sourcing FFB from their supplier since 18 October 2022.</p> <p>Our direct supplier will monitor the implementation of PT BSL's commitment, based on the above information.</p> <p>On 1 July 2021, FGV published an update on its sustainability efforts.<a href="https://www.fgvholdings.com/wp-content/uploads/2021/07/FGV-Sustainability-Updates-1-July-2021.pdf">https://www.fgvholdings.com/wp-content/uploads/2021/07/FGV-Sustainability-Updates-1-July-2021.pdf</a>. A further statement on FGV's progress in addressing the WRO was published on 18 June 2021. FGV reiterated its sustainability commitments and highlighted several initiatives that are being implemented, focused on improving its migrant worker recruitment process, developing human rights capacity building and training programmes, as well as strengthening its grievance mechanisms and enhancing labour monitoring systems. <a href="https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1">https://www.fgvholdings.com/press_release/fgv-updates-its-steps-to-address-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1</a>. On 16 November 2021, FGV announced that following a review of proposals from several organisations, the company had finalised the appointment of ELEVATE <a href="https://www.fgvholdings.com/press_release/fgvs-update-on-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1">https://www.fgvholdings.com/press_release/fgvs-update-on-the-u-s-customs-and-border-protection-cbps-withhold-release-order-wro-2/?pagen=1</a></p>	4. Closed	27-Feb-23

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
10	Incasi Raya	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation, peat development and peat forest development in the following concessions:	Mighty Earth	Rapid Response Report 10	On 28 February, 2023, FGV issued a press release: <a href="https://www.fgvholdings.com/press_release/fgvs-fy2022-financial-performance-charts-new-record-since-listing/">https://www.fgvholdings.com/press_release/fgvs-fy2022-financial-performance-charts-new-record-since-listing/</a> , stating that they have concluded its on-site assessments and FGV is implementing recommendations from their supply chain service provider and anticipated to submit the final report to CBP in the near future. Our direct supplier is maintaining regular communication with FGV to monitor their progress.	4. Closed	27-Feb-23
87	Nuridin Tampubolon Corporation (NT Corp)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Bintang Sakti Lengana	Mighty Earth	Rapid Response Report 19	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. Direct supplier is monitoring any further land clearance and there are no clearings in 2021 so far. Jun-22: No purchase data reflected as of H2 2021 traceability report.	2. Monitoring	29-Nov-22
243	Ta Ann Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - LPF 0010	Mighty Earth	Rapid Response Report 35	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that they were investigating the case prior to the publication of EIA . However, direct suppliers confirmed that it has suspended PT PSM since Aug 2022 due to the deforestation case. PT PSM has found to sell FFB to one of our indirect suppliers. Our direct suppliers has engaged them and they have stopped purchasing from PT PSM. Direct supplier is no longer linked to PT PSM.	3. Suspended	29-Nov-22
154	Permata Hijau	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Omitting mills from mill list that are tied to deforestation	RAN - Rainforest Action Network		ADM reached out to direct supplier for investigation. Our direct supplier informed us that Permata Hijau acknowledges and regrets this lapse in their mill list. They also commit to cease all sourcing from the mill in question, investigate their standard operating procedures, update their mill list, share no purchase list with our direct supplier, and issue a public statement. Our direct supplier is engaging with PH on discussion to verify their traceability report and mill list, as well as mediating dialogue between RAN and PH. Our direct supplier sent alerts to those supplier mills that KA has been deemed non-compliant with the direct supplier Social and Environmental Policy. We asked them to check and confirm that KA is not in their supply chain. All the supplier mills have confirmed that KA is not in their supply chain. In addition, according to information/sources from the field, KA owns and operates its own palm oil mill, and all FFB from KA's estate are supplied to KA mill. No purchase, our direct suppliers has taken necessary actions to prevent Kallista Alam mill to be in their supply chain.	4. Closed	29-Nov-22
112	PT. Delima Makmur	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		ADM conducted a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool. PT Delima Makmur has a low overall threat index value. ADM will continue to monitor the development of these values. Direct supplier, TTP is 100%, monitoring will be conducted. The disputed land identified is not in PT Delima Makmur. <a href="https://putusan3.mahkamahagung.go.id/direktori/putusan/19fc350dd7755964ab0e081cd05f0707.html">https://putusan3.mahkamahagung.go.id/direktori/putusan/19fc350dd7755964ab0e081cd05f0707.html</a> . Based on the investigation by the Aceh High Prosecutor's Office (Kejaksaan Tinggi Aceh) has dropped the case. Hence, the case against PT DM and the directors has been resolved legally.	4. Closed	29-Nov-22
109	PT. Perkebunan Lembah Bakti I	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. Sep-21: Perkebunan Lembah Bakti I & II have reached 100% TTP <a href="https://www.astra-agro.co.id/en/traceability-4/">https://www.astra-agro.co.id/en/traceability-4/</a> . Our direct supplier has stated that they are no longer buying from PT Laot Bangko and PT Indo Sawit Perkasa which are deforesting inside the Leuser Ecosystem.	4. Closed	29-Nov-22
268	ADM	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Aid Environment	Realtime Deforestation Monitoring- soy and cattle supply chains #5	In September, ADM received from Aid Environment the report Realtime Deforestation Monitoring- soy and cattle supply chains #5 by e-mail contact requesting explanation on (7) alleged cases of land clearing for soy and cattle who could be link to ADM in different locations in Bahia - Brazil. Among the 7 farms, ADM made recent negotiations with two of them. The areas were opened after planting soybeans in the 2021/2022 crop, so ADM do not received soybeans from the newly opened area. We have gathered all the necessary documentation to prove the legality of the land conversion of Fazenda Santa Maria. We are waiting for the documentation of Fazenda Indiana, future negotiations were suspended until the presentation of the necessary documentation to validate the legality of the land conversion.	4. Closed	20-Nov-22
221	Triputra Agro Persada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Brahma Binabakti	Mighty Earth	Rapid Response Report 34	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the area in question is outside of PT BB's concession area. Based on ground-truthing, the field belongs to the local community and used to be a rubber plantation. According to our direct supplier, they do not source directly from PT brahma Binabakti. Please see the verification report: <a href="https://bit.ly/3qONoOi">https://bit.ly/3qONoOi</a> TAP's internal policy is to not share HGU boundaries, but since they are RSPO members, they sent a revised map to the RSPO Membership Executive, and also provided our direct supplier with a copy of the receipt date on August 23, 2021. The map on the geoRSPO website will corrected. Given the evidence, GAR has decided to close this case.	4. Closed	2-Aug-22
232	First Resources	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - Cilandra Perkasa	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara		ADM reached out to its direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation. a. Suspected of developing plantation in forest production area (HP) and convertible production forest (HPK) in Kampar Regency, Riau b. Suspected of planting, harvesting, processing, selling, and marketing oil palm products illegally developed within a forest area. Regarding the allegation of developing on land that is within HPT and HPK area / forest area: Our direct supplier has engaged PT CP regarding the overlap of PT CP concession with a designated forest area. This overlap land matters in Indonesia involves the wider palm oil industry in Indonesia. In conducting its operations, PT. Cilandra Perkasa has obtained relevant and appropriate obligations from the government such as Izin Lokasi, Izin Usaha Perkebunan (IUP) and/or Hak Guna Usaha (HGU). To address these legacy issues, the government has updated the Omnibus Law to include Article 110A paragraph (1) "Everyone carrying out a business that has been established and having a Business Permit in a forest estate before Job Creation Law is in effect who has not fulfilled the requirements in accordance with the regulations of law in the forestry sector, must fulfil such requirements no later than three (3) years upon the effectiveness of the Job Creation Law.". Fuji is closely monitoring the case and engaging our direct suppliers for updates. We will keep our stakeholders informed on this case.	1. Under Investigation	1-Aug-22

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
242	Eagle High Plantations Tbk	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Khatulistiwa Agro Abadi / First Borneo Group	Mighty Earth	Rapid Response 40	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT AUS is still listed in the EHP's latest Consolidated Financial Statements as receivables and payables due to the absence of an 'offset' agreement. However, EHP confirmed that their CPO purchase contract with PT AUS ended in Sep 2018 and EHP have not sold FFB to PT AUS since 9 Dec 2019 and PT AUS is on their no purchase list. Since then, EHP have not entered into transactions with PT AUS. The reason why PT AUS appears on PT EHP's annual report/ financial statement is because they still have a debt to PT EHP for their previous business transaction before 2019 and that debt is not fully paid. PT AUS and PT EHP have yet reached an agreement on the debt payment; hence, we will still foresee PT AUS being mentioned in the financial report until this issue is resolved.	4. Closed	1-Aug-22
105	PT. Global Sawit Semesta	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife	RAN - Rainforest Action Network		ADM reached out to direct supplier for investigation. Our direct supplier informed us that he is engaging with the PT GSS and a field verification visit has occurred. PT GSS has 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: <a href="http://bit.ly/2E4moTr">http://bit.ly/2E4moTr</a> . An action plan was developed between direct supplier and GSS. It includes mapping of high-risk areas, which is to be shared with all FFB suppliers, request all FFB suppliers to commit to sourcing only from non-protected areas, stop FFB purchase from suppliers without a signed commitment letter, suppliers should commit to sourcing from no exploitation, respecting land rights and document traceability of FFB suppliers shed. Action plan will be monitor by direct supplier. An NDPE policy has been signed and TTP at 100%.	4. Closed	1-Aug-22
218	First Resources	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	The company allegedly has ownership over Fangiono Agro Plantation (FAP) Agri and Clandry Anky Abadi (CAA) neither of which were disclosed as being part of the	Aid Environment		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 heads the RSPO's Complaints System and is monitoring the outcome through the RSPO case tracker: <a href="https://askrspo.force.com/Complaint/s/case/5000o0003CLXepAAH/detail">https://askrspo.force.com/Complaint/s/case/5000o0003CLXepAAH/detail</a> The case is currently pending consideration by the CP on the method of investigation.	2. Monitoring	26-May-22
213	Yayasan Pelajaran Johor (Johor State Government)	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - YPJ Plantations Sdn Bhd (Ladang	Mighty Earth	Rapid Response Report 32	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. YPJ Plantation is committed to adhere to the NDPE criteria as described in their Sustainability Policy (2021). Our direct supplier confirmed that their satellite monitoring partner has verified that there was no forest loss/ peat land conversion in 2021. ADM considers this case closed.	4. Closed	26-May-22
212	Bunga	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 32	ADM reached out to direct supplier for investigation. ADM is requesting information to our direct supplier to clarify the situation. Our direct supplier informed us that Bunga has been engaged with and have adopted a group NDPE policy as well as a moratorium for any future oil palm plantation development. Bunga mentioned that the purchasing agreement stated that the land was suitable for planting and contained only shrubs. Bunga group has confirmed that there was no clearing of any primary of secondary forest in the concession in question. ADM will continue to monitor this case. Bunga Group has a commitment to the development of a recovery plan for non-compliant land clearing to the NDPE policy at group level. ADM considers this case closed.	4. Closed	26-May-22
182	Campang Tiga	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Campang Tiga - Land dispute	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. PT Campang Tiga (CT) explained to our direct supplier that the incident was related to a land dispute with another company. The incident was reported to the police. A mediation process was also initiated by the South Sumatera Provincial Government. Our direct supplier requested further information and documents from CT, as well as checking other sources to verify the information. In 2016, our direct supplier met with CT and was told that it is pursuing mediation with the local community. It had also started legal proceedings against the company which is alleged to be involved in the incident. CT will make a public announcement when the verdict is issued by court. ADM continues to monitor the case.	4. Closed	26-May-22
114	PT. Nafasindo	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. Nafasindo provided clarification regarding the RAN allegations. It was explained that there was an error due to wrong data issued by the provincial authority (BPN Kanwil Prop Aceh). Nafasindo explained that in 2016, the company acting on the provincial and district governments' letter released 347 hectares of land that had been under its control control as part of the dispute resolution between the communities in 22 villages and the company. ADM considers this case closed.	4. Closed	26-May-22
106	PT. Samudera Sawit Nabati	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Palm oil grown illegally at the expense of the protected peat forests of Rawa Singkil Wildlife Reserve in the Singkil-Bengkung	RAN - Rainforest Action Network		ADM reached out to direct supplier for investigation. Our direct supplier engaged with PT GSS to seek responses to the allegations contained in the RAN report. Furthermore, PT SSN declared that they did not source from CV Buana Indah as mentioned in the RAN report. An on-site field verification of the allegations was conducted. It was found that there are no SOPs in the mill and that TTP was relatively low. An action plans has been laid out by PT SSN in this regard. Based on the results of the verification visit, PT SSN will implement action plans to verify their processes to ensure raw material is procured from compliant sources. A third-party will be commissioned to conduct another visit. The report can be found here: <a href="http://bit.ly/2E4moTr">http://bit.ly/2E4moTr</a> PT SSN has verified its achievement of 100% TTP. Our direct supplier has also engaged PT SNN in its supplier program, which has been completed: <a href="https://bit.ly/2A0UOYD">https://bit.ly/2A0UOYD</a> . ADM considers this case closed.	4. Closed	26-May-22

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
245	Brazil - Eighteen properties listed in the tracker report	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Tracker Report	ADM reached out and engaged with its direct suppliers for investigation. The investigation concluded that there was no volume sourced from areas of deforestation, few suppliers had conversion. Those suppliers with conversion have sent legal land conversion authorizations/licenses, which are in accordance with the local legislation and our No Deforestation Policy. We have decided to discontinue doing business with 1 supplier until he resolves a pending issue.	4. Closed	4-Apr-22
239	Dewa Rencana Perangin Angin	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - Dewa Rencana Perangin Angin	Mongabay		ADM adopts a no buy position on the company.	3. Suspended	4-Mar-22
233	Incasi Raya	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - Sumbar Andalas Kencana	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara		ADM reached out to its direct supplier for investigation. ADM is requesting information to direct supplier to clarify the situation. Our direct supplier informed us that conducted an investigation, identifying that PT SAK only source FFB from their own plantation and their ex-plasma smallholder. The Plasma was developed by PT SAK and they are still supporting the core activities including maintenance, harvesting, and delivering to the PT SAK mill. ADM therefore considers this case closed.	4. Closed	4-Mar-22
141	Bumitama Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 23	ADM reached out to direct supplier for investigation. Our direct supplier informed us that these land changes were 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: <a href="http://bit.ly/ws/obwh">http://bit.ly/ws/obwh</a> Bumitama's further clarification on the land verification: <a href="http://bit.ly/BumitamaClarificationToGAR">http://bit.ly/BumitamaClarificationToGAR</a>	4. Closed	28-Jan-22
139	Sampoerna Agro	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Usaha Agro Indonesia	Mighty Earth	Rapid Response Report 22	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT UAI was not involved in any deforestation activity. The land in question belongs to the community, and the landowners do not intend to turn over their land to the company. Sampoerna Agro has an NDPE commitment in place.	4. Closed	28-Jan-22
132	Eagle High Plantations Tbk	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Arrtu Energie Resources	Mighty Earth	Rapid Response Report 22	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT AER was affected by fires that came from outside of their concession due to extreme dry weather conditions in Indonesia. PT AER has no 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: <a href="https://bit.ly/2L4NYqi">https://bit.ly/2L4NYqi</a> An update on the PT AER Action Plan can be found here:	4. Closed	28-Jan-22
131	Bumitama Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Damai Agro Sejahtera	Mighty Earth	Rapid Response Report 22, 23, 26, 27	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: <a href="http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7d9e985a">http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7d9e985a</a> PT DAS has conducted a land-use change analysis after allegations, but no land clearing was discovered. Our supplier also verified that there has been no recent deforestation in PT DAS: <a href="https://bit.ly/3cVs01U">https://bit.ly/3cVs01U</a>	4. Closed	28-Jan-22
125	TSH Resources Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Bulungan Citra Agro Persada	Mighty Earth	Rapid Response Report 21	ADM reached out to direct supplier for investigation. Our direct supplier informed us that TSH Resources Bhd adheres to their no burning policy as an RSPO member. TSH Resources commissioned Malaysian Environmental Consultants (MEC) which found that the clearing overlaps with recent massive local community land burning in Kalimantan Utara.	4. Closed	28-Jan-22
122	Makin	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Cipta Karsa Kahuripan	Mighty Earth	Rapid Response Report 21, 22	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT CKK ceased operations in 2016, and the land in question has been returned to the government. PT CKK had not performed any activity on the land. A notarized letter showing the company had ceased operations in 2016 was provided.	4. Closed	28-Jan-22
40	Genting Plantations Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Permata Sawit Mandiri	Mighty Earth	Rapid Response Report 15, 17, 19, 20, 23	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the concession PT Permata Sawit Mandiri doesn't belong to Genting Plantation Bhd since 2017 after it was divested to a non-related party. Genting Plantation's official statement can be found here: <a href="http://bit.ly/2wMjOaH">http://bit.ly/2wMjOaH</a>	4. Closed	28-Jan-22
37	TH Plantations Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Ladang Tabung Haji	Mighty Earth	Rapid Response Report 15, 18, 20	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.	4. Closed	28-Jan-22
34	Perkebunan Nusantara	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Perkebunan Nusantara II Prafi	Mighty Earth	Rapid Response Report 15	Our direct supplier informed us that PT Perkebunan Nusantara has divested the concession in question since 2014.	4. Closed	28-Jan-22
33	Genting Plantations Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Citra Sawit Cemerlang	Mighty Earth	Rapid Response Report 14, 15, 16, 17, 19, 23, 24, 27	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the concession PT Permata Sawit Mandiri doesn't belong to Genting Plantation Bhd since 2017 after it was divested to a non-related party. Genting Plantation's official statement can be found here: <a href="http://bit.ly/2wMjOaH">http://bit.ly/2wMjOaH</a>	4. Closed	28-Jan-22

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
246	Group of SOY farmers/growers in Correntina, Bahia (BRAZIL)	Soybean - Brazil - Direct	Human Rights - Land Dispute	Reports of alleged land tenure issues/social conflicts between traditional local communities and SOY farmers in Correntina, Bahia (Brazil)	Global Witness		<p>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.</p> <p>So far the investigation found that: 1) The lands on dispute are more than 150km from the farms from where ADM sources soy - all soy farms are in compliance with the Brazilian Forest Code and the Company's policies. Some of these farms are even certified under sustainable standard schemes. 2)The lands on disputes are owned by the farmers (legal land deeds and environmental permits/licences were provided to ADM). These lands have no farm production, only native vegetation, and serve as offsets of native vegetation (Legal Reserves) to areas under production (150km away) 3) These private areas were being constantly trespassed by 8 local community members who were using these areas irregularly and in disagreement with the Forest Code. 4) The Farmers/owners went to court to avoid people from trespassing. The case was tried and farmers won on 3 instances. 5) All suppliers interviewed deny having used violence or harassment against the traditional communities. 6) The investigation concluded that farmers are the legal owners of these lands. That these lands are in compliance with the Brazilian legislation and that the suppliers are in compliance with the Company's policies. No evidences of violent acts/harassment were found, and all suppliers deny this ever happened.</p>	4. Closed	12-Jan-22
238	Dharma Satya Nusantara Tbk (DSN)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concession:	Mighty Earth	Rapid Response Report 37	<p>ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT Kencana Alam Permai (KAP) parent's group, Dharma Satya Nusantara Tbk (DSN) is a member of RSPO since 2008, and all of their land development for palm is bound by RSPO Principles and Criteria. DSN has also made public commitment to NDPE policy (<a href="https://bit.ly/32k8M5E">https://bit.ly/32k8M5E</a>) where their last land clearing activities was in 2015.</p> <p>Specifically on the case on PT KAP, our direct supplier has initiated engagement with DSN since October 2021 to seek clarification on deforestation alert detected through their internal monitoring programme. PT KAP has carried out field investigation and confirmed that the clearance was carried out by five local communities for farming, including paddy planting. The area in question has not been surrendered to the company as the local communities are not keen to be involved in oil palm development. Therefore, PT KAP does not have full control over the said area. The outcome of the investigation has also been shared with the head village and endorsed (<a href="https://bit.ly/3yMo5k2">https://bit.ly/3yMo5k2</a>) by the head village accordingly. PT KAP's official response to the case is available here:</p>	4. Closed	20-Dec-21
237	Musim Mas	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concession: - PT Multipersada Gatramegah	Mighty Earth	Rapid Response Report 37	<p>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:</p> <p>a) HCV Report of PT Harisa Agro Lestari (<a href="https://bit.ly/3EcXZMP">https://bit.ly/3EcXZMP</a>) that has obtained satisfactory status (note: the area was part of PT Harisa Agro Lestari, which PT MPG officially acquired on 1st April 2018);</p> <p>b) HCS Report of PT Multipersada Gatramegah in 2018 that has covered the area in question (<a href="https://bit.ly/3qa10Uk">https://bit.ly/3qa10Uk</a>) which has completed HCSA review process (<a href="https://bit.ly/3pe7PVS">https://bit.ly/3pe7PVS</a>);</p> <p>c) This area has also undergone the RSPO NPP process (<a href="https://bit.ly/3spPEyf">https://bit.ly/3spPEyf</a>).</p> <p>All reports are published and available on HCVRN, HCSA, and RSPO websites, respectively.</p>	4. Closed	20-Dec-21
7	Felda Global Ventures	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: - PT Temila Agro Abadi	Mighty Earth	Rapid Response Report 9	<p>Our direct suppliers connected with Felda Global Ventures Holding are closely following up their actions. FGV continues to publicly reporting their progress and effort in addressing the grievances via their website: <a href="https://www.fgvholdings.com/sustainability/reports-updates/">https://www.fgvholdings.com/sustainability/reports-updates/</a></p> <p>Our direct supplier informed us that FGV has a stop work order for TAA since 2017. Please find FGV's press release here: <a href="https://www.fgvholdings.com/wpcontent/uploads/2020/03/FGVs-reply-to-Mighty-Earth-Rapid-Response-Report-20-Final.pdf">https://www.fgvholdings.com/wpcontent/uploads/2020/03/FGVs-reply-to-Mighty-Earth-Rapid-Response-Report-20-Final.pdf</a></p>	4. Closed	20-Dec-21
35	Samling	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	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	ADM adopts a no buy position on the company.	3. Suspended	28-Oct-21
30	Samling	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - LPF/008 Marudi & Batu Belah	Mighty Earth	Rapid Response Report 13, 17, 19, 20, 21, 24, 26,28, 30, 36	ADM adopts a no buy position on the company.	3. Suspended	28-Oct-21
235	Yayasan Sabah	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - Innoprise Plantations Bhd	Mighty Earth	Rapid Response Report 36	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.	4. Closed	28-Oct-21
193	Persada Alam Jaya	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Persada Alam Jaya - Purchasing FFB grown illegally	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. Their development programs for PT PAJ included Collaboration For Transformation (CFT), traceability training, and a special traceability program called Ksatria Sawit (collaboration with our partner Koltiva) PT PAJ reported to our direct supplier that it has achieved 89% TTP for the period of Jan-Jun 2020 and is on track to achieve 100% traceability by end 2020. In April, Persada reported that it has achieved 100% TTP. Considering the progress PT PAJ has made, ADM considers this case closed.	4. Closed	28-Oct-21



ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
148	Capitol Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the	Mighty Earth	Rapid Response Report 25, 26, 27, 28, 29	ADM reached out to direct supplier for investigation. Our direct supplier informed us that HCV/HCS has already been conducted by a qualified assessor, and the company has clarified that their land clearing was guided by the outcome of the assessments. However, some land clearance appears to have occurred inside of HCV/HCS areas due to community pressure to develop a plasma smallholders program. PT MPHs has agreed to rehabilitate the identified areas of land clearing in the recent HCV/HCS reports. PT MPHs is working closely with the Indonesian Watershed Monitoring Agency (BPDAS) and has committed to plant 30,000 trees as part of its rehabilitation program. The HCV/HCS report shall be submitted for peer review and a moratorium on any further land clearing has been in place since Q4 2020. An integrated report submitted to HCV Resource Network: <a href="https://bit.ly/3bj6163">https://bit.ly/3bj6163</a> Management plans for HCV/HCS areas were submitted in the meantime, protecting the areas while preventing similar reoccurrences. Our direct supplier is continuing engagement with and guiding PT MPHs through the peer review process as well as developing a rehabilitation plan.	4. Closed	28-Oct-21
1	Anglo-Eastern Plantations	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Kahayan Agro Plantation	Mighty Earth	Rapid Response Report 1, 14, 15, 18, 19, 20, 24,25,27	ADM reached out to direct supplier for investigation. Our direct supplier informed us that their internal monitoring detected indications of land clearance in KAP concession (4 ha) from May to June 2019. Subsequently, Mighty Earth Rapid Response Report No.18 also mentioned 6 ha land clearing from June 15-July 15 2019 using GLAD Alert coverage. Our direct supplier informed AEP and they answered that they had stopped land clearing activities since the moratorium announcement at the end of May 2019. Our direct supplier checked the exact date of the indication of the land clearing and found AEP's statement was verified. HCSA assessment and peer review has been completed and verified. The HCSA Secretariat and AEP are in the process of discussing further actions. ADM will continue to monitor this process. A moratorium for the disputed area is in place as of May 5, 2020: <a href="https://bit.ly/35OQ9Q">https://bit.ly/35OQ9Q</a> PT KAP has sent written confirmation to HCSA about conserving the remaining 150 Ha "disputed HCSA forest" which led HCSA to close the case. The statement can be found here: <a href="https://bit.ly/3kt8sbp">https://bit.ly/3kt8sbp</a>	4. Closed	28-Oct-21
227	Salim Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - PT Mitra Intisejati Plantation	Forest Peoples Programme	Demanding accountability	ADM adopts a no buy position on the company.	3. Suspended	15-Sep-21
230	PT Cipta Cakra Murdaya Case 10 in Report	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - PT Hardaya Inti Plantation	Forest Peoples Programme	Demanding accountability	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the case from 2012 was fully settled in 2014 through mediation by regional and provincial governments. PT HIP has clarified that they operate in accordance with all relevant legal permits. The land acquisition process was guided by national legal requirements, where they have provided due compensation for the land. The company has also carried out environmental management and monitoring in accordance with the AMDAL and RPL RKL documents to guide their operational practices. The plantation has also achieved ISPO certification since 2017, reaffirming their sustainability commitments and compliance to the relevant legal framework.	4. Closed	15-Sep-21
229	PT Kurnia Luwuk Sejati	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - PT Kurnia Luwuk Sejati	Forest Peoples Programme	Demanding accountability	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that in 2010 the community held a demonstration regarding PT KLS' business activities on allegedly illegally owned land. During the demonstration there was destruction of property and machinery by the local community. Therefore, law enforcement and authorities were involved to settle the dispute.	4. Closed	15-Sep-21
226	PT SMART tbk (GAR)	PalmOil - Indonesia - Direct	Environment - Deforestation & Conversion	Reports of NDPE violations in the following concessions: - PT Kresna Duta Agrindo	Forest Peoples Programme	Demanding accountability	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that there are no outstanding disputes with the community and KDA. Other issues listed in the report have been addressed and closed. KDA obtains all operational permits necessary, and monitors and audits its environmental impact assessment (AMDAL) requirements every six months. Monthly audits to ensure that requirements set by authorities are complied with are also conducted. Pricing of FFB is conducted using the price of the Indonesian Plantation Department as a reference and open market pricing. Final prices are openly communicated to farmer coops, farmers groups, and agents.	4. Closed	15-Sep-21
224	Bukit Asam	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 35	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that TP BSP clarified that there was no deforestation taking place as the area was planted with other crops prior converting to palm. Supporting documentation including field verification report and photos have been submitted to prove their claim, where it was found that the vegetation on the ground consists of mixture of other crops, which is mostly rubber and coffee. To ensure that their activities are aligned with the NDPE requirement, the supplier has also agreed to commit to moratorium. Relevant assessments will have to be carried out prior resuming their land clearing to ensure their compliance to NDPE.	4. Closed	15-Sep-21
211	SIPEF	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 32	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have already been in contact with SIPEF who provided input on the case: <a href="https://bit.ly/3o3gQ06">https://bit.ly/3o3gQ06</a> It outlines that SIPEF is within its rights and has undertaken all necessary assessments and precautions. A stand-alone HCS assessment was shared with the HCSA and used as a basis to conduct the land clearing occurred prior to formal HCSA peer review. The HCS assessment can now be seen to have been submitted on the HCSA website. The peer review has been completed, and results are publicly available: <a href="https://bit.ly/3IGid1A">https://bit.ly/3IGid1A</a>	4. Closed	15-Sep-21
222	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - Rimbunan Hiiiau LPE 0026	Mighty Earth	Rapid Response Report 34	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the land clearing is not related to oil palm development.	4. Closed	31-Jul-21
219	Rajawali Group/ Eagle High Plantations	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Tandani Sawit Papua	Mighty Earth	Rapid Response Report 34	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the land clearing was initiated by leaders of the Yaumumi village. It was intended for expansion of the village, and it was not communicated PT TSP because the village leaders were not aware that the land belongs to PT TSP. Discussion were held with the village leaders and the district government. As a result, the village leadership has agreed to stop clearing activities. PT TSP will put up signs to mark their land area. The verification report can be found here: <a href="https://bit.ly/3vjq24W">https://bit.ly/3vjq24W</a>	4. Closed	31-Jul-21

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
214	Bukit Barisan Indah Prima	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Reports of land conflicts involving the subsidiary: - PT Artha Prigel	Friends of the Earth	Milieudefense	ADM's direct supplier began engaging with Bukit Barisan Indah Prima (BBIP) in Q1 2020. Although PT Artha Prigel holds the legal land rights, conflicts with community members continued. A mediation process was started and included various key stakeholders: Lahat District Government, South Sumatra Provincial Government, the Police Department, the National Land Agency and some relevant government authorities. Due to violent conflicts ensuing, PT AP filed a police report regarding the attack. Discussion are currently ongoing with those involved. As a result of verification assessments, PT AP was able to show evidence of legal rights and mediation process.	4. Closed	31-Jul-21
163	PT Teupin Lada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	The company was found to be sourcing from PT Indo Alam, who violates NDPE policies.	RAN - Rainforest Action Network		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they have met and engaged with PT Teupin Lada on this issues. They agreed to cease sourcing from PT Indo Alam effective immediately. ADM will continue to monitor the supplier. PT TL informed our supplier that they have achieved 100% TTP.	4. Closed	31-Jul-21
128	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Rimbunan Sawit Sdn Bhd (Simunjan Estate)	Mighty Earth	Rapid Response Report 21	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the encroachment on the land was by local communities. ADM will continue to monitor the case. Our direct supplier informed us that the encroachment on the land was by local communities RH submitted their NDPE policy to our supplier.	4. Closed	31-Jul-21
111	PT. Runding Putra Persada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. A third-party trader conducted a field visit and confirmed that the FFB was not supplied to PT Runding Putra Persada during the 2018 deforestation period.	4. Closed	31-Jul-21
108	PT. Ensem Sawita Lestari	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. Our direct supplier conducted several field visits, and thorough collaboration with other stakeholders, action plans have been laid out. PT ESL started working on TTP. PT ES informed our direct supplier that they have achieved 100% TTP as of September 2020.	4. Closed	31-Jul-21
49	Incasi Raya	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Averna Sepakat	Mighty Earth	Rapid Response Report 17	ADM reached out to direct supplier for investigation. Our direct supplier informed us that it was not PT Arvena Sepakat, but the local communities of Kelompok Sinaga who illegally encroached the area. A police report was filed. An investigation was launched, and according to Musimmas, the local community has agreed to stop all activities in the PT Averna Sepakat concession.	4. Closed	31-Jul-21
215	Astra International Tbk	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Agincourt Resources Tbk	Mighty Earth	Rapid Response Report 33	ADM reached out to its direct suppliers for investigation. Investigations have shown that the allegations against PT Agincourt are related to the mining industry, not the palm oil industry. PT Agincourt is a different company to Astra Agro Lestari. ADM does not source any commodities from the mining industry and therefore has no connection to PT Agincourt.	4. Closed	30-Jun-21
119	First Resources	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Ketapang Agro Lestari	Mighty Earth	Rapid Response Report 21	ADM reached out to direct supplier for investigation. Our direct supplier informed us that a HCS/HCV assessment had been conducted by PT KAL, and the land development was carried out based on the results. After ground verification, it was identified that ~0.6 hectare of land, recommended for conservation, was cleared. This land was rehabilitated once it was identified.	4. Closed	30-Jun-21
23	Tuan Junus Sutiono and Tuan Watson Dharma	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	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	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: <a href="https://bit.ly/3px4Wal">https://bit.ly/3px4Wal</a>	4. Closed	30-Jun-21
82	Pactra Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 2)	Mighty Earth	Rapid Response Report 14, 18	ADM adopts a no buy position on the company.	3. Suspended	26-Feb-21
81	Pactra Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 1)	Mighty Earth	Rapid Response Report 14, 18	ADM adopts a no buy position on the company.	3. Suspended	26-Feb-21
169	Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd)	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 31	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PKNP is not a supplier to them based on the group ownership definition of the RSPO: <a href="https://bit.ly/3dRRWim">https://bit.ly/3dRRWim</a> <a href="https://bit.ly/3knZKtD">https://bit.ly/3knZKtD</a>	4. Closed	26-Feb-21
72	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of peat development and clearance prep/stacking lines in the following concessions: - Erajaya Synergy Sdn Bhd (Lassa division, part of LPF/0029)	Mighty Earth	Rapid Response Report 18	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing was mainly conducted by local communities and a small portion for non-palm related operations.	4. Closed	26-Feb-21
51	Dharma Satya Nusantara Tbk (DSN)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Prima Sawit Andalan	Mighty Earth	Rapid Response Report 17	ADM reached out to direct supplier for investigation. The land clearing was not conducted by DSN as they have a moratorium in place since 2015. The land was illegally encroached and cleared by communities from Dusun Tembaga and Desa Sungai Buluh, for the planting of paddy field. DSN has already reported the case to the local authorities and copies of the reports had also been shared with our direct supplier. ADM is monitoring the progress through direct suppliers and public communications. The RSPO has published revised boundaries of PT PSA.	4. Closed	26-Feb-21
170	Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd)	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PKPP Plantation Sdn Bhd	Mighty Earth	Rapid Response Report 31	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have engaged with PKPP who has committed to cease all clearing. Additionally, two lots of their land will be reserved for potential recovery sites. PKPP is also collaborating with a local university (UITM) on a conservation project in the area covering approximately 40 acres. PKPP as well as LKPP have publicly available NDPE policies and commitments in place.	4. Closed	29-Jan-21

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
162	Yayasan Pahang	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - YP Plantation Sdn Bhd	Mighty Earth	Rapid Response Report 30	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that that YPP conducted and an environmental impact assessment prior to land development, as well as having received approval from local authorities, the department of environment, and abiding by state regulations before developing the area in question. YPP has also adopted an NDPE policy and imposed a moratorium on land clearing. <a href="https://ypph.com.my/v4/polisi-mspo/#1599635710116-a294b1da-05dd">https://ypph.com.my/v4/polisi-mspo/#1599635710116-a294b1da-05dd</a>	4. Closed	29-Jan-21
161	Amanah Saham Pahang	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 30	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.	4. Closed	29-Jan-21
160	Amanah Saham Pahang	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 30	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.	4. Closed	29-Jan-21
159	Amanah Saham Pahang	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 30	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.	4. Closed	29-Jan-21
158	Instant Star Holdings Sdn Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area)	Mighty Earth	Rapid Response Report 30	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that IJM is already engaging with Aspirasi Kristal (AK), who have stopped their land clearing activities in July 2020. We have been informed the land clearing occurred in 2019 and recent activities were related to construction of infrastructure. IJM has in the meantime suspended supply from the FFB supplier AK while investigations are ongoing. Satria Eramaju (SE) has reassured its commitment to NDPE and relevant assessment prior to any land clearing. No land clearing was detected. IJM has also logged this case and will provide updates: <a href="https://www.ijmplantations.com/grievances-compliance-matters.php">https://www.ijmplantations.com/grievances-compliance-matters.php</a>	4. Closed	29-Jan-21
157	Instant Star Holdings Sdn Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 30	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that IJM is already engaging with Aspirasi Kristal (AK), who have stopped their land clearing activities in July 2020. We have been informed the land clearing occurred in 2019 and recent activities were related to construction of infrastructure. IJM has in the meantime suspended supply from the FFB supplier AK while investigations are ongoing. Satria Eramaju (SE) has reassured its commitment to NDPE and relevant assessment prior to any land clearing. No land clearing was detected. IJM has also logged this case and will provide updates: <a href="https://www.ijmplantations.com/grievances-compliance-matters.php">https://www.ijmplantations.com/grievances-compliance-matters.php</a>	4. Closed	29-Jan-21
156	Perbadanan Kemajuan Pertanian Negari Pahang (owner of LKPP Corporation Sdn Bhd)	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PKPP Plantation Sdn Bhd	Mighty Earth	Rapid Response Report 30	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they have engaged with PKPP, who has agreed to stop all land clearing at the Sungai Charu concession. Additionally, PKPP management has set aside two land banks located at Lipis, Pahang (426 ha) and Pekan, Pahang (130 ha) for its recovery plan. PKPP as well as LKPP have publicly available NDPE policies and commitments in place.	4. Closed	29-Jan-21
207	Wilmar International Ltd	PalmOil - Indonesia - Direct	Human Rights - Land Dispute	Mustika Sembuluh 2 - Land dispute, waste dumping, indigenous persons affected	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 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. <a href="https://beritakalteng.com/2018/05/14/jalani-sidang-adat-pt-mustika-sembuluh-wajib-bayar-2-311-kati-ramu/">https://beritakalteng.com/2018/05/14/jalani-sidang-adat-pt-mustika-sembuluh-wajib-bayar-2-311-kati-ramu/</a>	4. Closed	7-Jan-21
206	Wilmar International Ltd	PalmOil - Indonesia - Direct	Human Rights - Land Dispute	Mustika Sembuluh 1 - Land dispute, waste dumping, indigenous persons affected	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 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).	4. Closed	7-Jan-21
205	Kharisma Agro Sejahtera	PalmOil - Indonesia - Indirect	Environment - Air, Water, Waste Management	Kharisma Agro Sejahtera - Waste dumping, indigenous persons affected	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 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.	4. Closed	7-Jan-21
204	Kencana Utama Sejati	PalmOil - Indonesia - Indirect	Environment - Air, Water, Waste Management	Kencana Utama Sejati - Air pollution	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that this case dates back to 2015 and has been resolved since then. PT Kencana Utama Sejati conducts regular air quality monitoring every six month, which cover: 1. Ambient Air Quality 2. Quality of smell	4. Closed	7-Jan-21

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
203	Kuala Lumpur Kepong Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Jabontara Eka Karsa - Deforestation	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The previous owner started an oil palm plantation on the eastern section of the estate in 1997. It was later abandoned. 2. When KLK took over in 2006, this area was replanted. Subsequently, after a HCV assessment was conducted in 2010 KLK continued to develop the remaining areas of Jabontara estate until 2014. 3. The HCV assessment has resulted a total area of about 5,000 ha being demarcated and set aside for conservation, which is approximately 35% of the HGU area.	4. Closed	7-Jan-21
202	Wilmar International Ltd	PalmOil - Indonesia - Direct	Human Rights - Land Dispute	Bumi Sawit Kencana - Land dispute, intimidations, violent confrontation	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that all allegations and disputes have undergone the appropriate legal processes and/or land compensation payments. Intimidations and violent confrontations were not initiated but resolved by PT BSK security officers and a special operations unit of the Indonesian National Police (BRIMOB). Our direct supplier also provided a detailed account of all occurrences and outcomes to Global Witness.	4. Closed	7-Jan-21
201	GOLDEN AGRI/ Ivo Mas Tunggal	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Ujung Tanjung - Land grab, indigenous persons affected	Global Witness		ADM reached out to its direct supplier for investigation. ADM was informed by its direct supplier that: - 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.	4. Closed	7-Dec-20
200	SIPEF	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Tolan Tiga Indonesia - Land dispute, evictions, criminalisation	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the articles mention a recent demonstration at the premises of PT Tolan Tiga Indonesia. This was a follow up action by Kelompok Tani Bersatu (KTB) over an old claim which has gone through many years of communications and has long settled in court over 10 years ago. To date there have been at least 3 demonstrations, all coinciding with local political elections. Although the issue has been settled legally, a group of farmers under KTB have brought up this issue and utilized demonstrations as a means to communicate to PT Tolan Tiga Indonesia. It was during the most recent demonstration on 13th – 18th July 2020 that two of the KTB members were reported to the police for causing property damage. Based on the witness, video and photographic evidence provided the police have arrested the suspects.	4. Closed	7-Dec-20
198	Syaukath Agro	PalmOil - Indonesia - Indirect	Environment - Air, Water, Waste Management	Syaukath Agro - Waste dumping	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the waste-related issue has been resolved. A Liquid Waste Disposal Permit (IPLC) was issued in December 2019.	4. Closed	7-Dec-20
197	Surya Utama Nabati	PalmOil - Indonesia - Indirect	Environment - Air, Water, Waste Management	Surya Utama Nabati - Waste dumping	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that BLHD (Environmental agency in the area) has conducted an audit, and the BOD and COD levels still meet the quality standard. The distance between the waste pond and the well is more than 500 meters and is also separated by a river.	4. Closed	7-Dec-20
196	Sumber Sawit Nusantara	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Sumber Sawit Nusantara - Land dispute	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that according to SSN, the case is only a public accusation and is not based on valid evidence.The DPRD member (house of representative in the area) has made a visit to the company and was invited to see the conditions directly in the field and it turns out that the allegations are not substantiated.	4. Closed	7-Dec-20
194	Raja Marga	PalmOil - Indonesia - Indirect	Environment - Air, Water, Waste Management	Raja Marga - Waste dumping	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed that a site visit was conducted and a report and an action plan for RM was developed: <a href="https://bit.ly/3nKQ6Bs">https://bit.ly/3nKQ6Bs</a> Our direct supplier has monitoring developments. The waste dumping issue was also verified by our direct supplier. In November 2019, the wastewater did not comply with quality standards, but measures were put in place in order to comply with quality standards again. All documentation and permits are in place.	4. Closed	7-Dec-20
192	Parasawita	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Parasawita - Land dispute, evictions, criminalization	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the news are related to PT Rapala (not Parawasita). The area used to be part of PT Parasawita but has been sold to PT Rapala.	4. Closed	7-Dec-20
191	Multiguna Lestari Abadi	PalmOil - Indonesia - Indirect	Environment - Air, Water, Waste Management	Multiguna Lestari Abadi - Waste dumping	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that based on the Scofindo Lab test, all quality standards are still in accordance with the standards. However, MLA also realizes that the Reteh River is widely used by people who bathe and are used for drinking water as well, therefore MLA makes land applications to plantations around the factory for liquid waste disposal. MLA has also been checked by the Dinas Lingkungan Provinsi (the Environmental Agency) and the results are clear.	4. Closed	7-Dec-20
190	Minanga Ogan	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Minanga Ogan - Land dispute	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that employee payroll is usually carried out between the 20th to the end of the following month (for payment of the previous month's period). For example, May 2019 wages are paid from June 20 to the end of June with a separate payment according to Employee status in order to facilitate the implementation. 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.	4. Closed	7-Dec-20
188	Ja Wattie/ Kintap Jaya Wattindo	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Kintap Jaya Wattindo - Land dispute, criminalisation, deforestation	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the the company has withdrawn from the area and there are local rules and institution set up to protect community rights.	4. Closed	7-Dec-20
187	Indomas Mitra Teknik	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Indomas Mitra Teknik - Deforestation	Global Witness		A site visit was conducted in 2018, which verified that PT IMT did not source from PT Laot Bangko: <a href="https://bit.ly/3ecjffi">https://bit.ly/3ecjffi</a>	4. Closed	7-Dec-20

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186	Hutan Alam Lestari	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Hutan Alam Lestari - Land dispute	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that based on the recommendation from the Forestry Service, it was stated that the PT. HAL is located in the APL area covering 4,690 hectares and in the Production Forest Area covering an area of 1,310 hectares. The part of the land that is included in the Production Forest area is not cultivated.	4. Closed	7-Dec-20
184	Citra Sawit Harum	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Citra Sawit Harum - Land dispute, indigenous persons affected	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that CSH has committed to its NDPE policy: 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.	4. Closed	7-Dec-20
183	Ciptamas Bumi Selaras	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Ciptamas Bumi Selaras - Land dispute, waste dumping	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the Bengkulu Province Horticultural and Plantation Food Crops Office conducted mediation during a meeting on April 4, 2019 which was attended by community representatives from Kulik Sialang Hamlet, PT CBS, Kaur Regency Land Office, POLDA Bengkulu, and the Agriculture Office of Kaur Regency. The results of the meeting are as follows: 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.	4. Closed	7-Dec-20
181	Beurata Subur Persada	PalmOil - Indonesia - Direct	Environment - Air, Water, Waste Management	Beurata Subur Persada - Waste dumping	Global Witness		Our direct supplier states that BSP has been engaged with since 2016/2017. A verification visit was conducted in 2017 to follow up on a proposed action plan: <a href="http://bit.ly/2Kpq2tj">http://bit.ly/2Kpq2tj</a> A moratorium and NDPE commitment has been in place since early 2020: <a href="https://bit.ly/2Hlr1du">https://bit.ly/2Hlr1du</a> The overflow occurred due to heavy rain which the embankment (tanggul) could not withstand. The embankment has been raised and built with better materials.	4. Closed	7-Dec-20
180	Berkat Sawit Sejahtera	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Berkat Sawit Sejahtera (Inhil) - Land dispute	Global Witness		Research on this case has shown that the main issue raised is that BSS does not know whom to compensate. BSS paid for the land they operate on and are willing to compensate those who should be compensated.	4. Closed	7-Dec-20
178	Paramitra Internusa Pratama	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Belian Mill - Land dispute, deforestation	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they notified the Forest Peoples Programme (FPP) and the RSPO of its intention to submit New Planting Procedure (NPP) documents for plasma development in PT Paramitra Internusa Pratama (PT PIP) following public consultations. The RSPO informed our direct supplier that plasma development in PT PIP can proceed. Our direct supplier continues active dialogue with the FPP.	4. Closed	7-Dec-20
177	Kencana Persada Nusantara	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Arya Rama Prakarsa - Land dispute, deforestation	Global Witness		This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.	4. Closed	7-Dec-20
176	Archipelago Timur Abadi	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Archipelago Timur Abadi - Land dispute	Global Witness		This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.	4. Closed	7-Dec-20
175	Angso Duo Sawit/Mewah	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Angso Duo Sawit - Land dispute	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. The report provided further recommendations to enable PT ADS and its supply chains to implement remedial practices. The corrective actions are intended as an opportunity to work together with ADM's direct supplier to make transformations throughout their supply chain to meet its sustainability policy.	4. Closed	7-Dec-20
174	Agro Wijaya Industri	PalmOil - Indonesia - Indirect	Environment - Air, Water, Waste Management	Agro Wijaya Industri - Waste dumping, operating without a permit	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the DPRD (a member of the house of people representative in the region) has made an inspection visit to PT AWI together with the Environment Agency in Merangin. From the results of the PT AWI waste sample test, it is within the acceptable limits.	4. Closed	7-Dec-20
173	Adimulia	PalmOil - Indonesia - Indirect	Human Rights - Land Dispute	Adimulia Agrolestari - Land dispute, watershed violations	Global Witness		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they reached out to AA, who confirmed that the watershed is no longer a problem. It has been managed according to applicable protocol. AA is ISPO certified and regularly audited by the ISPO. Therefore, all protocols, especially those related to waste management have been addressed through supervision of the ISPO auditors.	4. Closed	7-Dec-20

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172	Abdi Budi Mulia	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Abdi Budi Mulia 2 - Land dispute, waste dumping, other environmental infractions	Global Witness		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.	4. Closed	7-Dec-20
171	Abdi Budi Mulia	PalmOil - Indonesia - Indirect	Environment and/or Human Rights - Multiple	Abdi Budi Mulia 1 - Land dispute, waste dumping, other environmental infractions	Global Witness		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.	4. Closed	7-Dec-20
168	Sime Darby	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	The mill Lavang (SOU 31) seems to be linked to deforestation in the Layang estate concession	Actiam		ADM reached out to its direct supplier for investigation. Our direct supplier informed that their team has checked and confirmed that the clearings detected happened outside of Sime Darby Plantation's Lavang estate boundary. The boundary marked by GFW in blue is not accurate as it overlapped with the boundary of a neighbour (external party) by the name of Warisan Sedar. The clearings detected are in Warisan Sedar's concession. For the estate boundary, you may look up Sime Darby's Layang estate on their Crosscheck 2.0, which is their open source online traceability tool at the below link. In the search box, type in "E.Layang": <a href="https://sd-platinum.maps.arcgis.com/apps/webappviewer/index.html?id=e29b476ae8c64e5e875cdfa8fc0ab731">https://sd-platinum.maps.arcgis.com/apps/webappviewer/index.html?id=e29b476ae8c64e5e875cdfa8fc0ab731</a>	4. Closed	7-Dec-20
167	Tradewinds	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	The mill Binu Plantations seems to be linked to deforestation in the Binu Plantations Bhd. Sdn.	Actiam		ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they engaged with Tradewinds who clarified that their team conducted ground verification of the area and confirmed that there is no clearing within Binu Plantation. The reported clearing happened outside Binu Plantation's concession which was carried out by external parties/local community.	4. Closed	7-Dec-20
138	Mulia Sawit Agro Lestari (MSAL)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation, clearance prep/Stacking line in the following concessions:	Mighty Earth	Rapid Response Report 22	ADM adopts a no buy position on the company.	3. Suspended	31-Aug-20
12	Mulia Sawit Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat development, peat forest development, clearance prep/Stacking lines in the following concessions:	Mighty Earth	Rapid Response Report 9, 10, 11, 12, 15, 17, 18, 20,22, 23, 24, 25, 27, 28,29	ADM adopts a no buy position on the company.	3. Suspended	31-Aug-20
155	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 29	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land is still owned by local smallholders, not by PJP Pelita Lundu Plantation Sdn Bhd. The land clearing was conducted by the local smallholders.	4. Closed	31-Aug-20
27	Wings Group Indonesia	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Sentosa Suksesutama	Mighty Earth	Rapid Response Report 12	ADM, its direct supplier, and the Wings Group discussed previous allegations and the progress made by the Wings Group since its suspension by ADM through a video call. ADM was satisfied that its re-entry criteria was met. HCSA assessments and concession/HGU maps were shared.	4. Closed	31-Aug-20
110	PT. Perkebunan Lembah Bakti II	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Risk of sourcing from the Singkil-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network		PT Perkebunan Lembah Bakti II does not appear in ADM's mill list. However, ADM will continue to monitor high risk mills through a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool.	4. Closed	31-Jul-20
99	Surya Dumai	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of clearance prep/stacking lines in the following concessions: - PT Kalimantan Agro Kencana	Mighty Earth	Rapid Response Report 20	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT KAK is not part of Surya Dumai.	4. Closed	31-Jul-20
140	Borneo Pacific Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 23	ADM adopts a no buy position on the company.	3. Suspended	29-Jun-20
151	Teladan Prima	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 26	ADM reached out to direct supplier for investigation. Our direct supplier informed us that a third-party carried out an assessment to verify that the deforestation was not committed by PT TBP: <a href="https://bit.ly/2RhlfyR">https://bit.ly/2RhlfyR</a> The official concession boundary was shared with our direct supplier, who then verified the via overlay map that the alleged deforestation is outside of PT TBP's concession: <a href="https://bit.ly/2V5sqmF">https://bit.ly/2V5sqmF</a>	4. Closed	29-Jun-20
149	Medco	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Energi Mitra Merauke	Mighty Earth	Rapid Response Report 25	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT EMM is not part of the PT Medco Group and therefore not under their management.	4. Closed	29-Jun-20
147	Gama	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Agro Lintas Nusantara	Mighty Earth	Rapid Response Report 17, 18, 24	PT Agro Lintas Nusantara previously had no identifiable connection to a Group. Upon researching this case, ADM was able to verify that PT ALN does not belong to Gama. Please see the below link: <a href="https://www.wilmar-international.com/wp-content/uploads/2018/09/100818-aide-announcement.pdf">https://www.wilmar-international.com/wp-content/uploads/2018/09/100818-aide-announcement.pdf</a>	4. Closed	29-Jun-20
145	TH Plantations Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 14, 23, 27	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.	4. Closed	29-Jun-20
144	PT Union Sampoerna Triputra Persada	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 23	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by the company, and that the concession is outside of their boundary.	4. Closed	29-Jun-20

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143	NPC Resource Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Sumber Alam Selaras	Mighty Earth	Rapid Response Report 23, 25, 26, 27, 29	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT SAS was affected by fires due to the extreme dry weather conditions in Indonesia. Parts of their current plantations were affected, as well as some conservation areas. Aidenvironment confirms that fires caused this land change, not deforestation. NPC Resources and PT SAS both have no open burning policies and will work on fire prevention methods. They also commit to carry out HCV/HCS assessment, no peat development and FPIC: <a href="https://www.npc.com.my/PublicStatement13Sep2018.pdf">https://www.npc.com.my/PublicStatement13Sep2018.pdf</a> HCV and HCSA reports have been completed and peer reviewed. NPC is drafting an action plan based on findings and recommendations of the assessments.	4. Closed	29-Jun-20
142	Incasi Raya	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth	Rapid Response Report 23	ADM reached out to direct supplier. Our direct supplier informed us that the concession does not belong to Incasi Raya. PT MAL is located in Kalimantan Barat while the location of the report is in central Kalimantan.	4. Closed	29-Jun-20
137	Kalimantan Sawit Kusama	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Fajar Saudara Lestari	Mighty Earth	Rapid Response Report 22	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT FSL was affected by the long dry season that caused a number of fire spots surrounding the concession. PT FSL has committed to a land clearing moratorium since July 2019. Please see the below links: No Development on HCS/HCV/Peat at group level since July 1, 2019: <a href="http://bit.ly/2EmiwNJ">http://bit.ly/2EmiwNJ</a> Kalimantan Sawit Kusama's official statement can be found here: <a href="http://bit.ly/2rHDAu">http://bit.ly/2rHDAu</a> Spatial analysis for hotspots and wildfires here: <a href="http://bit.ly/36wRpeM">http://bit.ly/36wRpeM</a>	4. Closed	29-Jun-20
134	Goodhope	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Rim Capital	Mighty Earth	Rapid Response Report 22	ADM reached out to direct supplier for investigation. Our direct supplier informed us they have been in contact with PT Rim Capital, who takes the allegations very serious. PT Rim Capital confirms that one land clearing is outside of their concession and the other occurred during landfires on community-owned areas. This was found out after a team of village heads and community representatives investigated. Local authorities acknowledged the verification and report stating the company did not commit the fires. PT Rim Capital has a NDPE policy in place since May 2017. Please see the below links: Goodhope's official statement can be found here: <a href="http://bit.ly/2EhArF2">http://bit.ly/2EhArF2</a> The field verification report can be found here: <a href="http://bit.ly/2LQfXYm">http://bit.ly/2LQfXYm</a> <a href="http://bit.ly/2PA25TW">http://bit.ly/2PA25TW</a>	4. Closed	29-Jun-20
133	Fangiono Agro Plantation	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Tirta Madu Sawit Jaya	Mighty Earth	Rapid Response Report 22, 24, 25, 27	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.	4. Closed	29-Jun-20
130	Agro Sarimas Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Agro Sarimas Indonesia	Mighty Earth	Rapid Response Report 22	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, it was a fire incident, and it happened outside of their concession. Please see the below links: PT ASI's response: <a href="http://bit.ly/2PFatK7">http://bit.ly/2PFatK7</a> Overlay map: <a href="http://bit.ly/2Yck8FE">http://bit.ly/2Yck8FE</a>	4. Closed	29-Jun-20
127	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Timrest Sdn Bhd	Mighty Earth	Rapid Response Report 21, 27, 28	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question was not cleared by the company and is outside of Timrest Sdn Bhd's concession boundary.	4. Closed	29-Jun-20
124	Teladan	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Teladan Palma Perkasa	Mighty Earth	Rapid Response Report 21	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to the Teladan Group as their concession permit expired 2 years ago and no activities were ever undertaken.	4. Closed	29-Jun-20
121	Golden Plantation Tbk	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation, peat forest development and clearance prep/stacking lines in the following concessions: - PT Mitra Java Agro Palm	Mighty Earth	Rapid Response Report 21	ADM reached out to direct supplier for investigation. We were informed that the land clearing spots were located outside PT MJAP concession.	4. Closed	29-Jun-20
120	Global Enterprise Sdn Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Bulunga Surya Pratama	Mighty Earth	Rapid Response Report 21, 27	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Bulunga Surya Pratama's concession boundary.	4. Closed	29-Jun-20
118	Dhanistha Surya Nusantara	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Sabhantara Rawi Sentosa	Mighty Earth	Rapid Response Report 21, 23, 26, 27	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Sabhantara Rawi Sentosa's concession boundary.	4. Closed	29-Jun-20
98	Felda Global Ventures	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Citra Niaga Perkasa	Mighty Earth	Rapid Response Report 20	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the alleged deforestation area belongs to the local community who did not give consent to FGV for land development even though the land is within FGV's "izin Lokasi" boundary. It is understood that the land clearing activities started since Jun'19 for paddy planting purpose. Both PT CNP and PT TAA operation in FGV Kalimantan involve only maintenance of road, drains and boundary trenches and water table.	4. Closed	29-Jun-20
97	STH Group (Sin Tek Huat)	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Makmur Bersama Asia	Mighty Earth	Rapid Response Report 20	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Makmur Bersama Asia's concession boundary.	4. Closed	29-Jun-20
96	IJM Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Prima Bahagia Permai	Mighty Earth	Rapid Response Report 20	ADM reached out to direct supplier for investigation. Our direct supplier informed us that IJM has confirmed that the land clearing areas are NOT located within the PBP's concession boundary.	4. Closed	29-Jun-20
95	Dharma Satya Nusantara Tbk (DSN)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 2)	Mighty Earth	Rapid Response Report 20, 23, 27	ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadastral map. RSPO has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.	4. Closed	29-Jun-20

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94	Dharma Satya Nusantara Tbk (DSN)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 1)	Mighty Earth	Rapid Response Report 20, 23, 27	ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadastral map. RSP0 has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.	4. Closed	29-Jun-20
92	Sime Darby	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Sime Darby Plantation Sdn Bhd	Mighty Earth	Rapid Response Report 19	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the location of land clearing mentioned by Mighty Earth 19 was just outside Derawan SOU 33 concession.	4. Closed	29-Jun-20
91	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of clearance prep/stacking lines in the following concessions: - RH Plantation (Selangor Estate)	Mighty Earth	Rapid Response Report 19	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing is non-palm related. ADM therefore considers this case closed.	4. Closed	29-Jun-20
90	AlamBumi Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - AlamBumi Sdn Bhd	Mighty Earth	Rapid Response Report 19	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to AlamBumi Sdn Bhd.	4. Closed	29-Jun-20
86	Samuel International Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of clearance prep/stacking lines in the following concessions: - PT Bina Sarana Sawit Utama	Mighty Earth	Rapid Response Report 19, 20, 24, 26, 27	ADM reached out to direct supplier for investigation. Our direct supplier informed us that based on their overlay map, the location of land clearing mentioned by Mighty Earth 19 was located more than 70 km away outside BSSU concession. Please see the below link: <a href="http://bit.ly/2kqcc1m">http://bit.ly/2kqcc1m</a>	4. Closed	29-Jun-20
85	Goodhope	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Sumber Hasil Prima	Mighty Earth	Rapid Response Report 19	ADM reached out to direct supplier for investigation. Our direct supplier informed us that both the satellite imagery interpretation and field verification (ground truthing) demonstrate that the land clearing of the particular spots reported in the Mighty Earth Rapid Response 19 were taking place in areas owned by local community located outside the concessions of PT SHP.	4. Closed	29-Jun-20
84	Lyman Agro Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Bonti Permai Jayaraya	Mighty Earth	Rapid Response Report 19	ADM reached out to direct supplier for investigation. Our direct supplier informed us that BPJ was not involved in any land clearing and the land clearing mentioned by Mighty Earth 19 was located outside their concession.	4. Closed	29-Jun-20
77	Woodman Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and peat development in the following concessions: - Baram Estate (Part of LPF/0004)	Mighty Earth	Rapid Response Report 18, 21, 27	We were informed that the concession is not related to palm oil production and the area is not within Woodman's concession.	4. Closed	29-Jun-20
76	Tradewinds	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat forest development in the following concessions: - Trans Kenyaland Sdn Bhd	Mighty Earth	Rapid Response Report 18, 19, 26	ADM reached out to direct supplier for investigation. Our supplier informed us that the location of land clearing mentioned by Mighty Earth 18 was located outside their concession.	4. Closed	29-Jun-20
75	TH Plantations Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: - TH Pelata Meludam Sdn Bhd	Mighty Earth	Rapid Response Report 18	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.	4. Closed	29-Jun-20
73	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: - Woodjaya Sdn Bhd (Lot 197)	Mighty Earth	Rapid Response Report 18, 26, 27	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing was conducted by communities for planting of pineapple.	4. Closed	29-Jun-20
69	KLK Bhd (Kuala Lumpur Kepong Bhd)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: - PT Menteng Jaya Sawit Perdana	Mighty Earth	Rapid Response Report 18, 19, 21	KLK Grievance List no.G06 shows that the alleged area is located within PT MJSP's permit area (Izin lokasi). It is however no longer within the management control of PT MJSP, as in Y2016 the area has been gazetted by Kementerian Lingkungan Hidup & Kehutanan ["KLHH"] as Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area.	4. Closed	29-Jun-20
68	Golden Plantation Tbk	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Airlangga Sawit Java	Mighty Earth	Rapid Response Report 18	We were informed from one supplier that the land clearing location mentioned by Mighty Earth was outside PT ASJ ILOK.	4. Closed	29-Jun-20
67	KPN (formerly GAMA)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Sumatera Unggul Makmur	Mighty Earth	Rapid Response Report 18,28	GAMA Group has changed its name to KPN Plantation. This change came along with a restructured single legal entity for several plantations that are now all group member companies. KPN Plantation has a NDPE Policy in place which now also incorporates PT SUM: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf</a>  For a list of KPN Plantation Group member companies please see below: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/2019_Oct_KPN_-_2nd_Progress_Report_-_01112019.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/2019_Oct_KPN_-_2nd_Progress_Report_-_01112019.pdf</a>  Furthermore, the company has provided a time-bound action plan that puts into operation its NDPE commitments: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf</a>  ADM considers this case closed, but continues to monitor the progress through direct suppliers and public communications.	4. Closed	29-Jun-20
64	Asian Agri (RGE)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat forest development, clearance prep/stacking line in the following	Mighty Earth	Rapid Response Report 17, 18, 20, 24, 26, 27	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession. Please see link for details: <a href="https://www.apicalgroup.com/sustainability/grievances/asian-agri-2/">https://www.apicalgroup.com/sustainability/grievances/asian-agri-2/</a>	4. Closed	29-Jun-20
62	CB Industrial Product Holding/ Jholin Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Kurun Sumber Rezeki	Mighty Earth	Rapid Response Report 17	Our supplier began the engagement process with the company that has a joint venture with CBIP. There is no relationship between the company and PT Kurun Sumer Rezeki. CBIP has no management control over the joint venture companies.	4. Closed	29-Jun-20
60	Woodman Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: - Liku estate, part of LPF 004	Mighty Earth	Rapid Response Report 17,18	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.	4. Closed	29-Jun-20



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59	Woodman Group	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: -Adong estate, part of LPF 004	Mighty Earth	Rapid Response Report 17, 18, 21, 27	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.	4. Closed	29-Jun-20
58	WTK	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Southwind Plantation Sdn Bhd	Mighty Earth	Rapid Response Report 17, 19	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that WTK was not involved in the land clearing. The clearance happened either outside their concession boundary or within "Native Dispute Land" inside their boundary. For clearance within "Native Dispute Land", we are engaging with WTK for more details on the nature of the dispute and the detail boundary of the disputed land.	4. Closed	29-Jun-20
57	Rimbunan Hijau	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	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	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.	4. Closed	29-Jun-20
56	Yuwang/ Empresa (M) Sdn Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Empresa (M) sdn Bhd (OT/0351)	Mighty Earth	Rapid Response Report 17, 18	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	4. Closed	29-Jun-20
54	Boustead Plantation Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of clearance prep/stacking line in the following concessions: -Boustead Pelita Kanowit Snd Bhd	Mighty Earth	Rapid Response Report 17	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	4. Closed	29-Jun-20
53	Sumber Tani Agung	PalmOil - Indonesia - Direct	Environment - Deforestation & Conversion	Reports of deforestation, clearance prep/stacking lines in the following concessions: - PT Tantikan Panduhuo Asi	Mighty Earth	Rapid Response Report 17	Land clearing identified was proved to happen outside the concession	4. Closed	29-Jun-20
52	Kirana Megatara	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of clearance prep/stacking lines in the following concessions: - PT Putra Katingan Pratama	Mighty Earth	Rapid Response Report 17	Kirana Megatara is not in ADM's supply chain since they are not palm related. Our direct supplier informed us that they reached out to Triputra Agro Persada, who confirmed that Kirana Megatara is not a supplier to them.	4. Closed	29-Jun-20
48	Kencana Agri Ltd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Agro Sawit Mas Lestari	Mighty Earth	Rapid Response Report 17	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	4. Closed	29-Jun-20
46	Genting Plantations Bhd	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Sepanjang Intisurya Mulia (649.47 ha)	Mongabay		The area identified in the Maphubs report showing deforestation is not in the Sepanjang Intisurya Mulia concession.	4. Closed	29-Jun-20
45	Saban Sawit Subur	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Saban Sawit Subur (516.82 ha)	Mongabay		According to the investigation of our direct supplier, land clearing is located outside of PT Saban Sawit Subur (SSS)'s areas. The detected land clearing took place inside Saraswanti Agro Estate, and PT SSS has no link to this company, and they are not suppliers to PT SSS. PT SSS is covered under our suppliers's existing monitoring programme and there is no known deforestation alert for PT SSS in 2019.	4. Closed	29-Jun-20
43	KL-Kepong Plantation Holdings Sdn Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Jabontara Eka Karsa (442.06 ha)	Mongabay		After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.	4. Closed	29-Jun-20
42	Ketapang Agro Lestari	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Ketapang Hijau Lestari (990.7 ha)	Mongabay		The company confirmed that they are not sourcing from concessions indicated to be carrying out forest clearing	4. Closed	29-Jun-20
41	Ahmad Zaki Resources Berhad (AZRB Group) Malaysia	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Ichtiar Gusti Pudi (425.97 ha)	Mongabay		After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.	4. Closed	29-Jun-20
32	Global Palm Resources	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Prakarsa Tani Sejati	Mighty Earth	Rapid Response Report 14	Our direct suppliers confirmed and concluded that the location of land clearing in the Mighty Earth report was not in the concession of PT Prakarsa Tani Sejati ( <a href="http://bit.ly/2v4XRca">http://bit.ly/2v4XRca</a> ). The parent company implemented a NDPE Policy ( <a href="http://www.gprholdings.com/environmental_policy.html">http://www.gprholdings.com/environmental_policy.html</a> ). ADM is monitoring the progress through direct suppliers and public communications.	4. Closed	29-Jun-20
28	Jaya Tiasa Holding Berhad (Rimbunan Hijau Group)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -LPF/0024	Mighty Earth	Rapid Response Report 12	Rimbunan Hijau is in our supply chain indirectly and our trading partners have similar NDPE policies as ours. Please note the reported case in Report #12 on Haya Tiasa Holding Berhad (Rimbunan Hijau group) LPF /0024 concerns Licensed Planted Forests which are designated for timber plantation such as acacia and not related to palm oil. ADM therefore considers this case closed.	4. Closed	29-Jun-20
18	Tabung Haji Plantations (TH Plantations)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Persada Kencana Prima	Mighty Earth	Rapid Response Report 5	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.	4. Closed	29-Jun-20
17	Samuel International Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Prasetya Mitra Muda Blok II	Mighty Earth	Rapid Response Report 6	Our supplier began an engagement process with parent company. According to this, Samuel Group has signed a letter of commitment in complying with the NDPE policy and currently exploring options for various assessment. In the meantime, our supplier continue to monitor PT Prasetya Mitra Muda Blok II's activities on monthly basis.	4. Closed	29-Jun-20

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9	Gama	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Agriprima Cipta Persada	Mighty Earth	Rapid Response Report 3, 4	Gama has changed its name to KPN Plantation. Therefore, the below mentioned information was retrieved from their new website. KPN Plantation has a NDPE Policy in place: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_Plantation_Sustainability_Policy.pdf</a>  Furthermore, the company has provided a time-bound action plan that puts into operation its NDPE commitments: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/KPN_-_NDPE_Policy_Time_Bound_Action_Plan.pdf</a>  Gama has worked with Aidenvironment and set up a Time Bound Plan. ADM considers this case close but continues to monitor the progress through direct suppliers and public communications.	4. Closed	29-Jun-20
8	KPN (formerly GAMA)	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Agrinusa Persada Mulia	Mighty Earth	Rapid Response Report 3, 20	Gama has changed its name to KPN Plantation. The area in question are outside PT Agrinusa Persada Mulia's HGU concession area. The land clearing was carried out by communities for farming, and by PT. BPUP (Bangun Bina Utama Papua) for road construction. Please find documentation below: <a href="http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf">http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf</a>	4. Closed	29-Jun-20
6	Fangiono Agro Plantation	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Ketapang Hijau Lestari	Mighty Earth	Rapid Response Report 9	HCS/HCV assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organization with the HCSA. Based on our supplier's monitoring system, there was no land clearing at the HCV/HCS area identified at the integrated HCV/HCS map. FAP adopted a NDPE policy as well as other environmental certifications: <a href="http://fap-agri.com/kebijakan/">http://fap-agri.com/kebijakan/</a> <a href="http://fap-agri.com/tentang-kami/">http://fap-agri.com/tentang-kami/</a> ADM considers this case close but continues to monitor the progress through direct suppliers and public communications.	4. Closed	29-Jun-20
4	BLD Plantation	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat forest in the following concessions: -BLD Plantation	Mighty Earth	Rapid Response Report 4, 5, 6, 7, 11	BLDP has been working with Earthworm Foundation (EF) and has published their Sustainable Palm Oil Policy with NDPE commitments in May 2019 ( <a href="http://www.blpdb.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf">http://www.blpdb.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf</a> ) EF is the advisory consultant and is supporting BLD in the crafting of a road map for the delivery and implementation of this policy and a grievance mechanism/procedure to address issues from both internal and external stakeholders. BLD has announced a moratorium on all future new development until the finalization of their policy implementation plan. And there will be no development of peatlands regardless of depth and HCS and HCV assessment will be conducted for all future developments. ADM considers this case closed but continues to monitor the progress through direct suppliers and public communications.	4. Closed	29-Jun-20
11	Indonusa	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Internusa Java Sejahtera	Mighty Earth	Rapid Response Report 7, 10, 11, 12, 15, 17, 20, 22,23, 25, 27, 28	ADM adopts a no buy position on the company.	3. Suspended	18-Jun-20
126	BBC Holdings Sdn Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Alambumi Plantation Sdn Bhd	Mighty Earth	Rapid Response Report 21, 26, 27	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
104	Shin Yang	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Linau Sinar Sdn Bhd	Mighty Earth	Rapid Response Report 13, 20, 21, 27	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
103	CB Industrial Product Holding	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Java Jadi Utama	Mighty Earth	Rapid Response Report 15, 20, 23, 26, 27	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
79	Samling	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - LPF/0007 Samling Jelalong (OP)	Mighty Earth	Rapid Response Report 14, 15, 16, 19, 20, 21, 23,24, 25, 26, 27	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
78	Samling	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - LPF/0006 Samling Lana	Mighty Earth	Rapid Response Report 15, 16, 18, 19, 20, 23, 25, 27	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
74	Shin Yang/Sarawak Oil Palms Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Shin Yang OP Planting Area	Mighty Earth	Rapid Response Report 18, 19, 20, 21, 25, 27	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
71	Samling	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Tunas Borneo Plantations	Mighty Earth	Rapid Response Report 18, 27, 28, 29	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
55	Shin Yang	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - Dataran Linau OP (SY) (Lot 1 Block	Mighty Earth	Rapid Response Report 17, 18, 19, 20, 21, 23, 25, 27	ADM adopts a no buy position on the company.	3. Suspended	3-Jun-20
66	Unknown Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions:	Mighty Earth	Rapid Response Report 16, 17, 20, 22, 27, 29	ADM reached out to direct supplier for investigation. Our direct supplier informed us that Bakrie management confirmed that MML is no longer part of Bakrie Group since Nov 9 2017. MML is no longer mentioned in the list of subsidiaries in Bakrie Sumatera Plantation's 2018 Annual Report. After reviewing our internal control system, we found that there is no connection with the mill/concession identified in the report. Therefore, this case is not related to ADM and considered closed.	4. Closed	3-Jun-20
50	Makin	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat forest development in the following concessions: -PT Mekar Karya Kahuripan	Mighty Earth	Rapid Response Report 17, 18, 19, 20, 21, 23, 25, 27	ADM reached out to direct supplier for investigation. Our direct suppliers informed that Makin stated that PT Mekar Karya Kahuripan's business activity has been ceased/frozen since 15th September 2016. Through our direct supplier's ongoing engagement with PT MKK, proof was provided to ME in the form of Notary Acts. Therefore, this case is classified as closed.	4. Closed	3-Jun-20

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
25	Shin Yang	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -LPF/0039 Zedtee SB	Mighty Earth	Rapid Response Report 4	ADM adopts a no buy position on the company.	3. Suspended	20-May-20
80	Salim/IndoGunta	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Rimbun Sawit Papua	Mighty Earth	Rapid Response Report 3, 10, 13, 14, 16, 17, 18, 20,23, 25, 26, 28, 29	ADM adopts a no buy position on the company.	3. Suspended	20-Mar-20
22	Tuan Junus Sutiono and Tuan Watson Dharma	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and clearance prep./stacking lines in the following concessions: - PT Subur Karunia Rava	Mighty Earth	Rapid Response Report 6, 9, 16, 25	ADM adopts a no buy position on the company.	3. Suspended	20-Mar-20
101	Shin Yang/Sarawak Oil Palms Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Dataran Seping Sdn Bhd (Adam Oil Palm Estate)	Mighty Earth	Rapid Response Report 20, 21	ADM adopts a no buy position on the company.	3. Suspended	21-Jan-20
38	Shin Yang Group / Sarawak Oil Palms Bhd	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of clearance prep/Stacking line in the following concessions: - Shin Yang LPF 0018	Mighty Earth	Rapid Response Report 15, 29	ADM adopts a no buy position on the company.	3. Suspended	21-Jan-20
146	Bukit Berlian Plantation Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation and/or peatland development in the following concessions: - PT Ginang Fohu Plantation	Mighty Earth	Rapid Response Report 17, 23, 28, 29	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by PT GFP but by the communities. Bukit Berlian Plantation Group have adopted an NDPE policy as can be seen on their website: <a href="http://www.bukitberlian.com/Sustainability-Policy.html">www.bukitberlian.com/Sustainability-Policy.html</a>	4. Closed	21-Jan-20
136	Indonusa	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Internusa Jaya Sejahtera (Merauke) - area 2	Mighty Earth	Rapid Response Report 2	ADM adopts a no buy position on the company.	3. Suspended	19-Dec-19
135	Indonusa	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Internusa Java Sejahtera	Mighty Earth	Rapid Response Report 2	ADM adopts a no buy position on the company.	3. Suspended	19-Dec-19
29	Palma Serasih	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Global Primatama Mandiri	Mighty Earth	Rapid Response Report 13, 21	ADM adopts a no buy position on the company.	3. Suspended	19-Dec-19
100	Salim Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Agro Subur Permai	Mighty Earth	Rapid Response Report 20, 21	ADM adopts a no buy position on the company.	3. Suspended	30-Nov-19
65	Samling	PalmOil - Malaysia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: -PT Syarikat Samling Timber Sdn	Mighty Earth	Rapid Response Report 17, 19, 20	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation/planting are not related to palm oil production.	3. Suspended	30-Nov-19
16	Salim Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Bintuni Agro Prima Perkasa	Mighty Earth	Rapid Response Report 1	ADM adopts a no buy position on the company.	3. Suspended	30-Nov-19
15	Salim Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: -PT Duta Rendra Mulva	Mighty Earth	Rapid Response Report 2	ADM adopts a no buy position on the company.	3. Suspended	30-Nov-19
5	Kencana Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation, peat development, peat forest development, clearance prep/ Stracking lines in the following concessions: - PT Kanuasindo Palm Industr	Mighty Earth	Rapid Response Report 5, 6, 12, 17, 20	ADM adopts a no buy position on the company.	3. Suspended	30-Nov-19
89	Evershine Asset Corporation & Everbright Resources Corporation	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Sentrakarya Manunggal	Mighty Earth	Rapid Response Report 19	ADM adopts a no buy position on the company.	3. Suspended	23-Sep-19
83	Tunas Baru Lampung	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Alleged clearance of forested peatlands.	Greenpeace	Chain Reaction Research	ADM adopts a no buy position on the company.	3. Suspended	26-Aug-19
63	Evershine Asset Corporation & Everbright Resources Corporation	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - PT Anugerah Makmur Sejati	Mighty Earth	Rapid Response Report 17	ADM adopts a no buy position on the company.	3. Suspended	15-Aug-19
14	Pundi	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat forest development, clearance prep/stacking lines in the following concessions:	Mighty Earth	Rapid Response Report 10, 11, 12, 18	ADM adopts a no buy position on the company.	3. Suspended	13-Jul-19
13	Asam Jawa Group	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of peat development in the following concessions: -PT Sumur Pandanwangi	Mighty Earth	Rapid Response Report 6, 10, 11	ADM adopts a no buy position on the company.	3. Suspended	13-Jul-19
44	Pundi	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Reports of deforestation in the following concessions: - Pundi Lahan Khatulistiwa (480.49 ha)	Mongabay		ADM adopts a no buy position on the company.	3. Suspended	10-Jul-19

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
47	Industria Chiquibul	PalmOil - Guatemala - Indirect	Human Rights - Working Conditions	Allegations of labor rights violations by palm oil producer Chiquibul in Guatemala.	Reuters		ADM adopts a no buy position on the company.	3. Suspended	20-Jun-19



## Appendix

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

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
NR 4	ADM	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Allegation of deforestation for PT Borneo International Anugerah, PT Arjuna Utama Sawit, PT Equator Sumber Rezeki	Mighty Earth	Rapid Response report 49	07-Apr-2025: Mighty Earth suspected ADM to be linked to First Borneo Group. ADM already adopts a no-buy position of First Borneo Group and companies owned by Mr. Alexander Thalsim. ADM is not connected to those mills.	4. Closed	7-Apr-25
NR 3	ADM	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Report of deforestation in Riau and Central Kalimantan	Flora		10-Jan-2025: ADM's in-depth investigations, supported by accurate satellite monitoring, indicated that land clearing activities where conducted outside of the concessions linked to ADM supply chain.	4. Closed	10-Jan-25
NR 2	ADM	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Report of deforestation in PT SSN and PT RPP	Grupo Bimbo	Rainforest Action Network - Ourangutan Capital	10-Jan-2025: PT SSN and PT RPP are not mentioned by latest published version of Rainforest Action Network - Orangutan Capital. PT RPP is on track, following the resolution plan that was defined 2 years ago as RAN published its first version of the Orangunta Capital report.	4. Closed	10-Jan-25
NR 1	ADM	PalmOil - Indonesia - Indirect	Environment - Deforestation & Conversion	Report of deforestation in PT Multi Sarana Agro Mandiri (PT MSAM) concession on the island of Laut, East Kalimantan	Mighty Earth	Rapid Response report 47	10-Jan-2025: ADM company does not have any links to the Jhonlin Group	4. Closed	10-Jan-25
271	ADM	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of fire events for soy and cattle	Aid Environment	Realtime Deforestation Monitoring- soy and cattle supply chains #7	21-Nov-24: We conducted an analysis and concluded there was no soy planted in the area. Recent images show the are is being naturally restored. Nov-2022: ADM received the Realtime Deforestation Monitoring- soy and cattle supply chains #7.	4. Closed	21-Nov-24
267	Brazil - Twelve properties as listed in the report in municipalities of Bahia and Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 1	07-Nov-24: After years of close monitoring the reported properties, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 13-Jul-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
266	Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 3	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 12-Aug-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
265	Brazil - Fourteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Roraima	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 2	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 12-Aug-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
264	Brazil - Twelve properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Pará	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 4	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 18-Sep-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
263	Brazil - Sixteen properties as listed in the report in the municipalities of Piauí, Bahia, Goiás, Maranhão, Tocantins, Pará, and Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 5	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 23-Sep-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
262	Brazil - Twelve properties as listed in the report in the municipalities of Acre, Bahia, Mato Grosso, and Pará	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 6	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 30-Nov-19: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
261	Brazil - Twelve properties as listed in the report in the municipalities of Bahia, Mato Grosso, Goiás, and Pará	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 7	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 21-Jan-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
260	Brazil - Ten properties as listed in the report in the municipality of Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 10	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 27-Apr-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
259	Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Tocantins	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 9	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 27-Apr-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
258	Brazil - Fourteen properties as listed in the report in the municipalities of Amazonas and Bahia	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 8	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 27-Apr-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
257	Paraguay - Twelve properties as listed in the report in the municipalities of Boquerón, Alto Parana	Soybean - Paraguay - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 15	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
256	Brazil - Thirteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão and Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 11	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
254	Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão and Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 12	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
253	Brazil - Eleven properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 13	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 31-Aug-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
252	Brazil - Ten properties as listed in the report in the state of Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 16	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 06-Nov-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
251	Brazil - Eleven properties as listed in the report in the municipalities of Bahia, Pará, Maranhão, and Mato Grosso	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 14	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 06-Nov-20: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
250	Brazil - Seven properties as listed in the report in the states of Mato Grosso, Pará, and Tocantins	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 17	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 07-Jan-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24

ID	Reported Group	Supply Chain (Commodity-Country-Relationship)	Grievance Category	Description of the Grievance	Reported By	Reporting Source	Investigation Updates & Actions Taken by ADM	Status	Last Update
249	Brazil - Ten properties as listed in the report in the municipalities of Piauí, Maranhão, Mato Grosso and Pará	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 19	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 26-Feb-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
248	Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 21	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 31-Mar-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
247	Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Mighty Earth	Rapid Response Soy and Cattle Report 20	07-Nov-24: After years of close monitoring the reported areas, ADM has closed the grievance. Nonetheless, we continue to conduct supply chain due diligence to guarantee compliance with legislation and our policies. 31-Mar-21: The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	4. Closed	7-Nov-24
296	ADM	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Report of deforestation related to soy supply chain in Maranhao and Bahia	Mighty Earth	Rapid Response	In August 2024, ADM received the Rapid Response Soy Report including two case studies linking deforestation and natural ecosystem conversion in the Brazilian Amazon and Cerrado biomes. The investigation concluded that none of the deforestation cases presented in the report is linked to soy ADM has sourced, or in breach of ADM' policies.	4. Closed	10-Sep-24
287	Wilmar International Ltd	N/A - China - Other	Human Rights - Working Conditions	Allegation pertaining to ADM's ownership interest in Wilmar	Hunterbrook Media		Hunterbrook Media published a report on May 29, within two hours after their first inquiry from Hunterbrook Selected Research, alleging that Wilmar facilities in Xingjiang may be non-compliant with its policies due to "extensive state-sponsored forced labor policies". No information or evidence was provided other than location of facilities in Xingjiang. No sourcing from these facilities was attributed to ADM. Both companies are committed to compliance with local laws and regulations protecting workers' rights. In addition, each company has its own human rights policy that explicitly states forced labor is not allowed in their operations or supply chains, with the policies applying both to the companies and their business affiliates. ADM has reached out to Wilmar for additional information regarding due diligence related to the facilities.	4. Closed	8-Jul-24
291	ADM	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of land clearing related to soy	Mighty Earth	Rapid Repose - Soy Report	ADM received a notice from Mighty Earth in February 2024, as a part of their Rapid Repose - Soy Report, that a farm located in Mato Grosso State and within 50km of an ADM grain silo had allegedly cleared land and native vegetation in 2023. After investigating, it was determined that this farm does not supply to ADM and the owner was not found to have been a supplier to ADM from any other farms.	4. Closed	26-Feb-24
274	ADM	Soybean - Brazil - Direct	Environment - Deforestation & Conversion	Reports of fire events for and land clearing soy and cattle	Aid Environment	Realtime Deforestation Monitoring- soy and cattle supply chains #12	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report. <a href="https://www.fgvholdings.com/wp-content/uploads/2020/03/Background-and-Summary-of-FGV-Action-Plan-2020.pdf">https://www.fgvholdings.com/wp-content/uploads/2020/03/Background-and-Summary-of-FGV-Action-Plan-2020.pdf</a>	4. Closed	18-May-23
270	ADM	Soybean - Brazil - Indirect	Environment - Deforestation & Conversion	Reports of land clearing for soy and cattle	Aid Environment	Realtime Deforestation Monitoring- soy and cattle supply chains #3	In June, 2022, ADM received the Realtime Deforestation Monitoring- soy and cattle supply chains #3. ADM did not source soy from any of the farms listed on the report RDM #3 in the crop 2021/2022. The analyses were made by remote sensing and consultation of our grain purchase systems.	4. Closed	24-Jun-22
244	ADM	Soybean - Brazil - Indirect	Environment - Deforestation & Conversion	Realtime Deforestation Monitoring- soy and cattle supply chains #3	Aid Environment		ADM did not source soy from any of the farms listed on the report RDM #3 in the crop year 2021/2022. The analyses were made by remote sensing and consultation of our grain purchase systems.	4. Closed	24-Jun-22
166	Not Applicable	N/A - China - Indirect	Human Rights - Working Conditions	Reports of Human Rights Violations in the Xinjiang Uygur Autonomous Region	Bell		ADM investigated any possible links to sourcing from the region in question. There are no direct links, and no identifiable indirect links. The vast majority of ADM's indirect purchasing process in the APAC region contains a compliance clause/human right clauses. ADM is currently in process of publishing standard indirect purchasing terms and conditions for the APAC region containing a human rights clause.	2. Monitoring	7-Dec-20