

No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
283	Prison Labor in U.S Supply Chains	Reports of elevated risk for human rights violations	Associated Press	Linkage still under review	ADM received an inquiry from a report 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 supply chains for instances of violations to its Human Rights Policy but will continue to publish results of those reviews.	Under Investigation	31-Jan-24
282	Prison Labor in Southeast U.S Peanut Supply Chain	Reports of elevated risk for human rights violations	Associated Press	Indirect via third party commissioned agent	ADM received an inquiry from a reporter from the Associated Press. The reporter linked prison labor to ADM's subsidiary, Golden Peanut. ADM communicated to the AP and its customers that its 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. ADM and Golden Peanut began an investigation on the linkage of prison labor to its parent supply chain. Golden Peanut reached out to its suppliers for clarification on the labor practices.	Under Investigation	30-Jan-24
278	AAK/AarhusKarlshamn AB	Reports of deforestation and/or peatland development in the following concessions: -Tesus Nisa Mills	Upfield / Sveriges Natur	Indirect via third party suppliers/traders.	ADM reached out to its supplier for investigation. Our direct supplier provided information on the allegations first raised in 2018. Sveriges Natur reported a list of 20 mills that extract oil from illegally grown palm fruit inside Tesus Nisa, 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 Tesus Nisa linkages. In 2023 all mills committed to either landscaping or revegetation monitoring audits 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 applied 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 2023) Our trading partners confirmed they do not source from the Tesus Nisa link and the surrounding National Parks. Supplying mills to our trading partners (mills mentioned in the RDO 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 dialogue with suppliers after receiving the report, clarifying that they do not directly purchase Fresh Fruit Bunches (FFB) from the mentioned area. They report that crude palm oil suppliers to comply with their Sustainability Policy. Full audits will be conducted, and a corrective action plan will be developed based on the findings. Our direct supplier attempted to establish a no-tolerance threshold of a lack from its sources. (Recent reviews on the work on-site/monitoring measures in progress)	Under Investigation	03-Jul-23
271	ADM Brazil - BA/MA/MT	Reports of fire events for soy and cattle	Aid Environment - Realtime Deforestation Monitoring- soy and cattle supply chains #7	Direct connection between ADM and the farms or farmers.	On November, 2022, ADM received the Realtime Deforestation Monitoring- soy and cattle supply chains #7. ADM reached out to its direct supplier for investigation. A request for information from direct supplier to clarify the situation. A suspected of developing plantation in forest protection area (FP) and convertible protection forest (CPF) in Campo Alegre, Alagoas. A suspected of planting, harvesting, processing, selling, and marketing of palm products. (Ripley) developed within a forest area. Regarding the allegation of developing on land that is within FP and HFE area / forest area. Our direct supplier has engaged PT CF concession with a designated forest area. This overlap land matters in Indonesia include the wider palm oil industry in Indonesia. In conducting its operations, PT Chloraria Perkasa has obtained relevant and appropriate obligations from the government such as Izin Lokasi, Izin Lokasi Perkebunan (IJP) and/or Izin Gula Usaha (IGU). To address their illegal issue, the government has updated the Omnibus Law (CPL) in Article 225B paragraph (1). "Companies carrying out a business that has been established and having a Business Permit in a forest estate before the Omnibus Law is an effect who has not fulfilled the requirements in accordance with the regulations in law in the forestry sector, must fulfil such requirements no later than three (3) years upon the effectiveness of the said Omnibus Law". Fujii is strongly monitoring the case and engaging our direct suppliers for updates. We will keep our stakeholders informed on this case.	Under Investigation	09-Dec-22
232	First Resources	Reports of NDPE violations in the following concessions: -Clanraia Perkasa	Tempo, Mongabay Indonesia, BetaInfo, and Auriga Nusantara	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation. A suspected of developing plantation in forest protection area (FP) and convertible protection forest (CPF) in Campo Alegre, Alagoas. A suspected of planting, harvesting, processing, selling, and marketing of palm products. (Ripley) developed within a forest area. Regarding the allegation of developing on land that is within FP and HFE area / forest area. Our direct supplier has engaged PT CF concession with a designated forest area. This overlap land matters in Indonesia include the wider palm oil industry in Indonesia. In conducting its operations, PT Chloraria Perkasa has obtained relevant and appropriate obligations from the government such as Izin Lokasi, Izin Lokasi Perkebunan (IJP) and/or Izin Gula Usaha (IGU). To address their illegal issue, the government has updated the Omnibus Law (CPL) in Article 225B paragraph (1). "Companies carrying out a business that has been established and having a Business Permit in a forest estate before the Omnibus Law is an effect who has not fulfilled the requirements in accordance with the regulations in law in the forestry sector, must fulfil such requirements no later than three (3) years upon the effectiveness of the said Omnibus Law". Fujii is strongly monitoring the case and engaging our direct suppliers for updates. We will keep our stakeholders informed on this case.	Under Investigation	01-Aug-22
245	Brazil - Eighteen properties listed in the tracker report in the Group of SOY Farmers/growers in Correntina, Bahia (BRAZIL)	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Tracker Report	No direct connection between soy sourced by ADM and areas	ADM reached out to its direct supplier for investigation. The investigation concluded that there was no volume sourced from areas of deforestation, but suppliers had conversion. Those suppliers with conversion have sent legal land conversion authorization/consents, which are in accordance with the local legislation and our No Deforestation Policy. We have decided to discontinue doing business with 1 supplier until he resolves a pending issue on October 18th, 2023. ADM received from Global Witness an e-mail contact regarding an alleged case of land conflict between a local traditional community called Capoeira Molinda and soy growers who could be linked to ADM in Correntina, Bahia (BRAZIL). Due to COVID-19 restrictions and the short timeframe (30 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 former land 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 formal investigation was initiated with the goal of ensuring that the land conversion was done in compliance with the Company's policies. No evidence of violent acts/harassment were found, and all suppliers deny this ever happened.	Under Investigation	04-Apr-22
246	Reports of alleged land tenure issues/local conflicts between traditional local communities and SOY farmers in Correntina, Bahia (Brazil)	Global Witness (London, UK)	Direct SOY growers/suppliers	Indirect via third party suppliers/traders.	On October 18th, 2023, ADM received from Global Witness an e-mail contact regarding an alleged case of land conflict between a local traditional community called Capoeira Molinda and soy growers who could be linked to ADM in Correntina, Bahia (BRAZIL). Due to COVID-19 restrictions and the short timeframe (30 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 former land 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 formal investigation was initiated with the goal of ensuring that the land conversion was done in compliance with the Company's policies. No evidence of violent acts/harassment were found, and all suppliers deny this ever happened.	Under Investigation	12-Jan-22
152	Astra Agro Lestari	Reports of land disputes and resistance by local citizens in the following concessions: - PT Mannaung (Pasang Kayu)	Wahli	Indirect with parent company via third party suppliers/traders.	Our direct supplier has engaged with Astra Agro Lestari on all listed cases and provided us with an update of each case. Please see the summary below. PT Mannaung: Initial positive dialogue 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. PT 11: Additional information has been requested by PPT 11 to order to investigate the unresolved alleged land grab. It was clarified by PTT that there are no outstanding activities for its operations. Pricing rates in accordance with the regulation set by the Minister of Agriculture of the Republic of Indonesia. PT A&A: All relevant permits are in place and laws complete with. Community rights are always respected, and land tenure is obtained through proper channels including the community and agreement is reached.	Monitoring	31-Jan-24
228	PT Insi Nuna Sejahtera/ PT Capitol	Reports of NDPE violations in the following concessions: -PT Mitra Austral Sejahtera	Forest Peoples Programme: Demanding accountability	Indirect with parent company via third party suppliers/traders.	The case is currently under review by the RSPO Complaints Panel. ADM recognizes and heads the RSPO's Complaints System and is monitoring the outcome through the RSPO case tracker: <a href="https://rsपो.my.site.com/Complaints/case/S00000000286tAAe/Detail">https://rsपो.my.site.com/Complaints/case/S00000000286tAAe/Detail</a> . CP's decision letter has been furnished: <a href="https://rsपो.my.site.com/rsपो/RSPO0000010/0/0c00000000/KaFMyAgMcXUj_u1LUXMKS7VjIpdteTCQCb_Oq8g?The Appraisal Panel's decision letter is delivered: https://rsपो.my.site.com/rsपो/RSPO0000010/0/0c00000000/KaFMyAgMcXUj_u1LUXMKS7VjIpdteTCQCb_Oq8g">https://rsपो.my.site.com/rsपो/RSPO0000010/0/0c00000000/KaFMyAgMcXUj_u1LUXMKS7VjIpdteTCQCb_Oq8g</a>	Monitoring	31-Jan-24
276	Runding Putra Persada	Reports of deforestation in the following concessions: -Makmun plantation	RAN - Rainforest Action Network	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on the allegations. Our direct supplier informed that RPP has achieved ISO27:TR and they are able to check the covering information. PT RPP is checking records and will take action accordingly. Our indirect supplier was linked to Makmun plantation through their supplier FFB supplier. A series of meetings and engagement with PT RPP was carried out thereafter. A field verification was 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 Makmun plantation has a certificate of ownership (CHM) covering an area of 29 hectares. There is no clear evidence in the report to indicate that the non-forest smallholder land parcels to the claim date that correlate PT RPP.	Monitoring	30-Aug-23
164	FGV Holdings Berhad and its subsidiaries and joint ventures	Reports of deforestation and human rights violations	US Border Customs	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier 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 labour 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) <a href="https://www.fairlabor.org/wp-content/uploads/2020/03/Background-and-Summary-of-FLOA-Action-Plan-2020.pdf">https://www.fairlabor.org/wp-content/uploads/2020/03/Background-and-Summary-of-FLOA-Action-Plan-2020.pdf</a>	Monitoring	31-May-23
234	Padaas Enam Utama	Reports of NDPE violations in the following concessions: -Koto Kampar	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on both allegations. 1) Suspected development of plantation in the convertible protection forest (CPF) and protected forest (PS) in Kota Kampar - our direct supplier informed us that this is a legacy issue. PT PEU is a holder of an HGU (No. 14/HGU/UP/90) issued by the National Land Agency in 2010. HGU is the highest "rank" tier of land in a plan of company can possibly obtain. The government (National Land Agency) reviewer has granted the HGU title for PT PEU if these have been a forest owner and logging case. PT PEU is also a holder of GDO certificate. Legality is the most important aspect in GDO's principle and Criteria, see Principle No 1 in the table here: <a href="https://forum.usaid.com/document/download/2022/0c1317-2020.pdf">https://forum.usaid.com/document/download/2022/0c1317-2020.pdf</a>	Monitoring	5/8/2023	
209	Astra Agro Lestari	Sari Aditya Loka 1 - Land dispute, evictions, violent confrontation, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed that Covid-19 protocol was to ensure only personnel of PT SAC entered the premises. A confrontation resulted in arrest, upon which local police was called to avoid any further conflict. Mediation efforts are ongoing, and PT SAC has been providing assistance to the community and the Orang Rimba people in the surrounding area. A&A public response can be found under: <a href="https://bit.ly/2U8t0G3">https://bit.ly/2U8t0G3</a>	Monitoring	29-Mar-23
210	Sime Darby Plantation Berhad and its subsidiaries, joint ventures, and affiliated entities in Malaysia	Reports of human rights violations	U.S. Customs and Border Protection	Direct with parent company.	ADM reached out to its 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 verify what has caused the implementation of the Withhold Release Order (WRO). SD has openly engaged with the CBP and Liberty Shred, the issuers of the petition to the CBP, and provided a list of its existing practices in relation to the areas of concern outlined in the petition: <a href="https://bit.ly/39wagwq">https://bit.ly/39wagwq</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/38t6025">https://bit.ly/38t6025</a> . P&A 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/3ShvEa8">https://bit.ly/3ShvEa8</a> . SD appointed Impact Ltd. to conduct a third party laboratory 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 fixing the CBP's WRO.	Monitoring	29-Mar-23
231	PT Tasma Paja	Reports of NDPE violations in the following concessions: -Batang Cenaku	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier provided detailed information on the allegations: 1) Our direct supplier has verified that PT TP had obtained all mandatory permits (LOK in 2006, IUP in 2007) long before the alleged area was designated as a forest area by the Government of Indonesia in 2018 and 2018. 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 a year for the companies with such legacy issues to settle the requirements in accordance with the regulations of law in the forestry sector. To address the current overlap issue, PT TP submitted a proposal for a forest release permit to the Ministry of the Environment and Forestry of Indonesia and also to the provincial government of Riau. 2) Suspected of accumulating, purchasing, processing, selling, and marketing of palm products developed from illegally grown plantations in Bukit Buntar 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 track following CPOC to refinery, not FFB's from the farm inside Bukit Buntar National Park to the mill. Further supporting evidence is being sought as the task for continued investigation and engagement with PT TP. Our direct supplier has registered PT Tasma Paja's Batang Cenaku mill in one of their programs to help them attain 100% traceability by the end of 2022 as the currently have TP of ready FFB.	Monitoring	29-Mar-23	
236	Rimbunan Hijau	Reports of various NDPE violations including environmental degradation, deforestation, and human rights and health and safety	Global Witness - The True Price of Palm Oil	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed that they have been engaged with RH. An array of documents were provided including the allegations. The documents included written statements and consent from landowners in association with PFC, communication with Rimbunan Hijau (RH) Consultancy, agreement with landowner company issued by the Provincial Government, and a field visit report by an independent consultant. The documents shared the status of a lack of Respected Protective Equipment (RPE) provided for workers. This will be further investigated. On the matter of allegations of violence and harassment, RH clarified that police presence was approved by the Royal PNG Constabulary, and no restriction was identified upon investigations of authorities including the Ombudsman Commission. On the point of deforestation and environmental degradation issues, RH clarified that all legal operations are met. Compliance is monitored by the PNG Forest Authority Project supervisor onsite. Additionally, our direct supplier has been engaged with RH since 2018 on 100% compliance. A commitment to conduct HCS assessment prior to any new land clearing was made. Our direct supplier is also engaging with RH on the matter of PPE provisions and health and safety practices. Report can be found <a href="https://www.globalwitness.org/en/campaigns/forests/the-true-price-of-palm-oil/#resource-library">https://www.globalwitness.org/en/campaigns/forests/the-true-price-of-palm-oil/#resource-library</a> updated in June 14th, 2022	Monitoring	29-Mar-23
87	Nurdin Tambulphon Corporation (NT Corp)	Reports of deforestation in the following concessions: -PT Bintang Sakti Lengana	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that HCS/RECV assessment will be used using HCS/RECV registered assessment and will take action. Furthermore, a commitment to do development on HCS/RECV is in place on a group-level. Direct supplier is monitoring any further land clearance and there are no clearings in 2022 so far. Jan-23, has purchase status as of 29-2231 harvest.	Monitoring	29-Nov-22
218	First Resources	The company allegedly has ownership over Fangsomo Agro Plantation (FAP) Agri and Clandyri Anky Abadi (CAA) neither of which were disclosed as being part of the concessions.	AidEnvironment	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier 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://rsपो.my.site.com/Complaints/case/S00000000333AgAp4/Detail">https://rsपो.my.site.com/Complaints/case/S00000000333AgAp4/Detail</a> . The case is currently pending consideration by the CP on the method of investigation.	Monitoring	26-May-22
2	Austindo Nusantara Jaya Agri (ANJ Group)	Reports of deforestation in the following concessions: - PT Putera Mannaung Perkasa	Mighty Earth Rapid Response Report 3, 4, 6, 8, 10	Indirectly with parent company via third party suppliers/traders.	Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: <a href="https://bit.ly/2z9q6th">https://bit.ly/2z9q6th</a>	Monitoring	28-Oct-21
3	Austindo Nusantara Jaya Agri (ANJ Group)	Reports of deforestation in the following concessions: -PT Putera Mannaung Perkasa	Mighty Earth Rapid Response Report 10, 11	Indirectly with parent company via third party suppliers/traders.	Austindo Nusantara Jaya Agri (ANJ Group) has implemented a group-wide moratorium on new land clearing not in line with NDPE: <a href="https://bit.ly/2z9q6th">https://bit.ly/2z9q6th</a> ANJ has met many milestones on its sustainability efforts including: expanding its group-wide sustainability policy, sharing conservation boundaries, INHS clearance liability, the target recovery area, a framework for rehabilitation project, and a grievance mechanism. These details can be found under: <a href="https://www.group.com/sustainability-approach-and-policies">https://www.group.com/sustainability-approach-and-policies</a> ANJ has communicated with Mafab Park and also obtained the four remaining areas of its remaining clearances.	Monitoring	28-Oct-21

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19	Tsani Hutani Abadi Group	Reports of deforestation in the following concessions: - PT Rayatama Jaya	Mighty Earth Rapid Response Report 2, 5, 6, 9, 14	No direct or indirect connection between ADM and the parent company or mill.	THA made significant progress on its sustainability program and has been publicly reporting updates through its first two progress reports. THA signed a letter of intent with Yayasan Konservasi Alam Nusantara (YKAN), which is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments. Golden Agra Resources (GAR) has acquired THA (PT Krating 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 Compensation Procedure to address and past deforested lands by the purchased entities in the West Kutai/ East Kalimantan area.	Monitoring	30-Jun-21
20	Tsani Hutani Abadi Group	Reports of deforestation in the report in the municipalities of: - PT Harapan Rimba Jaya	Mighty Earth Rapid Response Report 2, 5, 9	No direct or indirect connection between ADM and the parent company or mill.	THA made significant progress on its sustainability program and has been publicly reporting updates through its first two progress reports. THA signed a letter of intent with Yayasan Konservasi Alam Nusantara (YKAN), which is an affiliate of The Nature Conservancy. This collaboration has enabled field assessments and development of recovery plans to support THA's sustainability commitments. Golden Agra Resources (GAR) has acquired THA (PT Krating 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 Compensation Procedure to address and past deforested lands by the purchased entities in the West Kutai/ East Kalimantan area.	Monitoring	30-Jun-21
247	Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 20	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	31-Mar-21
248	Brazil - Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 21	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	31-Mar-21
249	Brazil - Ten properties as listed in the report in the municipalities of Piauí, Maranhão, Mato Grosso and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 19	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	26-Feb-21
208	Gemilang Jaya Kencana Abadi/ Putra Keritang Sawit	Putera Keritang Sawit - Waste dumping, purchasing FFB grown illegally	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PPS was engaged with and the immediate actions were required to be put in place to ensure the purchase of illegally grown FFB is prevented in the future. Apsial together with their consultants conducted a verification visit to PPS on the report by EAF. They found that appropriate actions were taken to ensure no illegal FFB sourcing ( <a href="https://www.apsia.com/sustainability/governance/apsia/">https://www.apsia.com/sustainability/governance/apsia/</a> ). PT PPS also attended Apsial'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 PPS has provided traceability data to Apsial who continues to monitor their supply chain closely.	Monitoring	07-Jan-21
250	Brazil - Seven properties as listed in the report in the states of Mato Grosso, Pará, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 17	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	07-Jan-21
166	Not Applicable	Reports of Human Rights Violations in the Xinjiang Uyghur Autonomous Region	Bell	No identifiable direct or indirect connection between ADM and the region.	ADM investigated any possible links to sourcing from the region in question. There are no direct links, and no identifiable indirect links. The vast majority of ADM's indirect purchasing process in the APAC region contains a compliance clause/human rights clause. ADM is currently in process of publishing standard indirect purchasing terms and conditions for the APAC region containing a human rights clause.	Monitoring	07-Dec-20
179	Bengkulu Sawit Lestari	Bengkulu Sawit Lestari - Land dispute, waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. The land dispute is being settled in the field. The location permit has indeed expired, but it has no impact on operations because they already have an LPS. 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 review on waste was incorrect. Based on the Decree of the Minister of Environment and Forestry no 54.696 / Menk / Setjen / Kum. / J / 12/2017 dated 15 December 2017, the results of the performance improvement assessment (Propag) program have been issued and PT BLS gets the blue paper. PT BLS mill is a closed area in South Bengkulu regarding waste management. After the news appeared in the newspaper, the BLS team contacted the local environmental agency. The results of the examination found that the upstream and downstream river water in the waste storage outlet was in line with the standard.	Monitoring	07-Dec-20
185	Garuda Food/ Garuda Bumi Perkasa	Garuda Bumi Perkasa - Land dispute, waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2017. Based on the assessment, an action plan and a number of development programs were developed. The main problem that has emerged in publicly reported information (which has been confirmed) is complaints from residents regarding environmental issues. Tracing results with stakeholders indicated that the main problem was poor social relations with the village head, who played a role in the Maseul area. The mill has fixed the problem and currently relations with the community are quite good.	Monitoring	07-Dec-20
189	Sumber Jaya Indahnusa	Kota Tengah - Land dispute, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that land compensation for the community has been carried out. The HGU permit expires in 2022, 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 SI identify the history of land ownership of 500 ha when it was first obtained and identification of Malay tribes about their relationship with the original owner of the land (from which tribe, is it recognized by the district / provincial customary institutions) and conduct participatory CSR (social) programme analysis with communities affected by company activities.	Monitoring	07-Dec-20
199	Tayan Bukit Sawit	Tayan Bukit Sawit - Suspected licensing violations	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they are currently engaging with TBS and awaiting a response. ADM will continue to monitor the case.	Monitoring	07-Dec-20
251	Brazil - Eleven properties as listed in the report in the municipalities of Bahia, Pará, Maranhão, and	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 14	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	06-Nov-20
252	Brazil - Ten properties as listed in the report in the state of Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 16	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	06-Nov-20
253	Brazil - Eleven properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 13	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	31-Aug-20
254	Brazil - Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 12	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	31-Aug-20
256	Brazil - Thirteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 11	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	31-Aug-20

No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
257	Paraguay – Twelve properties as listed in the report in the municipalities of Boquerón, Alto PT_Socifindo	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 15	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	31-Aug-20
115		• Risk of sourcing from the Singki-Bengkang region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM conducted a risk analysis of its mill for using the Global Forest Watch Pro Palm Risk Analysis Tool. Socfinho (Ara Loba) and Socfinho (Pis Tanih Gumbang) both have a low overall threat index value. ADM will continue to monitor the development of these values.	Monitoring	31-Jul-20
61	Kwantas Corporation	Reports of deforestation in the following concessions: - Kwantas Pelita Plantation	Mighty Earth Rapid Response Report 14, 17, 20, 26	Indirect with parent company via third party suppliers/traders.	We were informed that the land in question is within the parameters of Kawanta Pelita Plantation (Beligan) Sdn Bhd (KPPSB) concession. However, this land does not belong to KPPSB as it has not been surrendered to KPPSB through the Native Customary Right (NCR) Land Acquisition project. The land is in private owned and KPPSB has not been involved in any clearing activities.	Monitoring	27-Apr-20
258	Brazil – Fourteen properties as listed in the report in the municipalities of Amazonas, Bahia, Mato Grosso, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 8	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	27-Apr-20
259	Brazil – Nine properties as listed in the report in the municipalities of Bahia, Mato Grosso, and Tocantins	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 9	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	27-Apr-20
260	Brazil – Ten properties as listed in the report in the municipality of Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 10	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	27-Apr-20
261	Brazil – Twelve properties as listed in the report in the municipalities of Bahia, Mato Grosso, Goiás, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 7	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	21-Jan-20
262	Brazil – Twelve properties as listed in the report in the municipalities of Acre, Bahia, Mato Grosso, and Pará.	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 6	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	30-Nov-19
263	Brazil – Sixteen properties as listed in the report in the municipalities of Piauí, Bahia, Goiás, Maranhão, Tocantins, Pará, and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 5	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	23-Sep-19
264	Brazil – Twelve properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Pará	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 4	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	18-Sep-19
265	Brazil – Fourteen properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, Mato Grosso, and Roraima	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 2	No direct connection between soy sourced by ADM and the areas of deforestation identified in this report.	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	12-Aug-19
266	Brazil – Ten properties as listed in the report in the municipalities of Piauí, Bahia, Maranhão, and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 3	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	12-Aug-19
267	Brazil – Twelve properties as listed in the report in municipalities of Bahia and Mato Grosso	Reports of land clearing for soy and cattle	Mighty Earth Rapid Response Soy and Cattle Report 1	No direct connection between soy sourced by ADM and the areas of deforestation	The investigation concluded that there was no sourcing from the reported deforestation areas. We will closely monitor land use change in the properties listed to make sure they are in compliance with the local legislation and our No Deforestation Policy.	Monitoring	13-Jul-19
39	Ta Ann Group	Reports of deforestation in the following concessions: - Ladang Selezu Sdn Bhd	Mighty Earth Rapid Response Report 15	Indirectly with parent company via third party suppliers/traders.	Our supplier is investigating the allegation and a field verification on the deforestation allegation in the week of 23rd July. Moratorium of land clearing has been put in place while investigation is ongoing. A field assessment was done by the supplier's team and it was verified that clearing activities were done outside the concession boundaries of Ladang Selezu. Ta Ann Group is suspended due to unresolved case.	Suspended	31-Jan-24
279	Mentari Group	Reports of deforestation and/or peatland development in the following concessions: - PT Alamansi Lestari	Rapid Response 42	Indirect via third party suppliers/traders.	ADM reached out to its supplier for investigation. ADM identified that PT Riman Salam Palm Indonesia is potentially linked through a indirect supplier. On April 5, 2022, according Permata Hijau Group grievance website received information that PT. Alamansi 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. Alamansi 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 ASI 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 soil 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 Riman Salam Palm.	Suspended	12/29/2023
88	Tunas Baru Lampung / Sungai Budi Group	Reports of deforestation in the following concessions: - PT Samora Usaha Jaya (B)	Rapid Response 39 & Chain Reaction Research	Indirectly with parent company via third party suppliers/traders.	ADM reached out to its supplier for investigation. ADM identified that PT Riman Salam Palm Indonesia is potentially linked through a indirect supplier. On April 5, 2022, according Permata Hijau Group grievance website received information that PT. Alamansi 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. Alamansi 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 ASI 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 soil 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 Riman Salam Palm.	Suspended	27-Feb-23
273	Sarawak Oil Palm/Shin Yang	Reports of deforestation and peat development in the following concession: - LPI/0018	Rapid Response 15,18,19,20,21	Indirect via third party suppliers/traders.	ADM's direct supplier last purchase from SOP was in Nov'18. Clearings were found to be in a non-palm entity. However, SOP/Shin Yang is no longer in our indirect supplier's supply chain since Jan – Jun'20. ADM may resume trade with SOP/Shin Yang if its entry requirements are followed.	Suspended	2/27/2023
243	Ta Ann Group	Reports of deforestation and/or peatland development in the following concessions: - LPE 0010	Mighty Earth Rapid Response Report 35	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they were investigating the case prior to the publication of EA. However, direct suppliers confirmed that it has suspended PT PSM since Aug 2022 due to the deforestation case. PT PSM has found to sell PB 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 listed by PT PSM.	Suspended	11/29/2022
239	Dewa Rencana Perangin Angin	Reports of NDPE violations in the following concessions: - Dewa Rencana Perangin Angin	Mongabay	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	04-Mar-22
30	Samling Group	Reports of deforestation in the following concessions: - LPI/008 Marudi & Batu Belah	Mighty Earth Rapid Response Report 13, 17, 19, 20, 21, 24, 26, 28, 30, 36	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	28-Oct-21
227	Salim Group	Reports of NDPE violations in the following concessions: - PT Mitra Intisigai Plantation	Forest Peoples Programme: Demanding accountability	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	15-Sep-21
81	Pactra Group	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 1)	Mighty Earth Rapid Response Report 14, 18	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	26-Feb-21
82	Pactra Group	Reports of deforestation in the following concessions: - PT Arjuna Utama Sawit (area 2)	Mighty Earth Rapid Response Report 14, 18	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	26-Feb-21
12	Mulia Sawit Group	Reports of peat development, peat forest development, clearance prep/Stacking lines in the following	Mighty Earth Rapid Response Report 9, 10, 11, 12, 15, 17, 18, 20, 22, 23, 24, 25, 27, 28, 29	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	31-Aug-20

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138	Mula Sweet Agro Lestari (MSAL)	Reports of deforestation, clearance prep/Stacking line in the following concessions:	Mighty Earth Rapid Response Report 22	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	31-Aug-20
140	Borneo Pacific Group	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	29-Jun-20
11	Indonusa Group	Reports of deforestation in the following concessions: - PT Internusa Jaya Sejahtera	Mighty Earth Rapid Response Report 7, 10, 11, 12, 15, 17, 20, 22, 23, 25, 27, 28	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
55	Shin Yang	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth Rapid Response Report 17, 18, 19, 20, 21, 23, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
71	Samling	- Dataran Linau OP ISVI I Lot 1 Block Reports of deforestation in the following concessions: - PT Tunas Borneo Plantations	Mighty Earth Rapid Response Report 18, 27, 28, 29	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
74	Shin Yang/Sarawak Oil Palms Bhd	Reports of deforestation in the following concessions: - Shin Yang OP Planting Area	Mighty Earth Rapid Response Report 18, 19, 20, 21, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
78	Samling	Reports of deforestation in the following concessions: - LPF/0006 Samling Lana	Mighty Earth Rapid Response Report 15, 16, 18, 19, 20, 23, 25, 27	Indirect via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
79	Samling	Reports of deforestation in the following concessions: - LPF/0007 Samling Jelalong (OP)	Mighty Earth Rapid Response Report 14, 15, 16, 19, 20, 21, 23, 24, 25, 26, 27	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
103	CB Industrial Product Holding	Reports of deforestation in the following concessions: - PT Jaya Jadi Utama	Mighty Earth Rapid Response Report 15, 20, 23, 26, 27	Indirect via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
104	Shin Yang group	Reports of deforestation in the following concessions: - Linau Sinar Sdn Bhd	Mighty Earth Rapid Response Report 13, 20, 21, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
126	BBC Holdings Sdn Bhd	Reports of deforestation in the following concessions: - Alambumi Plantation Sdn Bhd	Mighty Earth Rapid Response Report 21, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	3-Jun-20
22	Tuan Junus Sutiono and Tuan Watson Dharma	Reports of deforestation and clearance prep/stacking lines in the following concessions: - PT Subur Karunia Raya	Mighty Earth Rapid Response Report 6, 9, 16, 25	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
35	Samling Group	Reports of deforestation, clearance prep/Stacking line in the following concessions: - Samling Helang LPF 0007 (Parts 1 & 3)	Mighty Earth Rapid Response Report 15, 18, 19, 20, 23, 25	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
36	Double Dynasty Holdings Sdn Bhd	Reports of deforestation, clearance prep/Stacking line in the following concessions:	Mighty Earth Rapid Response Report 15, 16, 18, 19, 20, 25	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
80	Salim/IndoGunta	Reports of deforestation in the following concessions: - PT Rimban Sawit Papua	Mighty Earth Rapid Response Report 3, 10, 13, 14, 16, 17, 18, 20, 23, 25, 26, 28, 29	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	20-Mar-20
31	Double Dynasty Group	Reports of clearance prep/stacking lines in the following concessions: - Radiant Lagoon Sdn Bhd	Mighty Earth Rapid Response Report 13	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	21-Jan-20
38	Shin Yang Group / Sarawak Oil Palms Bhd	Reports of clearance prep/Stacking line in the following concessions: - Shin Yang LPF 0018	Mighty Earth Rapid Response Report 15, 29	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	21-Jan-20
101	Shin Yang/Sarawak Oil Palms Bhd	Reports of deforestation in the following concessions: - Dataran Seping Sdn Bhd (Adam Oil Palm Estate)	Mighty Earth Rapid Response Report 20, 21	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	21-Jan-20
29	Palma Serasih	Reports of deforestation in the following concessions: - PT Global Primatama Mandiri	Mighty Earth Rapid Response Report 13, 21	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	19-Dec-19
135	Indonusa	Reports of deforestation, clearance prep/Stacking line in the following concessions: - PT Internusa Jaya Sejahtera	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	19-Dec-19
136	Indonusa	Reports of deforestation in the following concessions: - PT Internusa Jaya Sejahtera (Merauke) - area 2	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	19-Dec-19
5	Evershine Asset Corporation & Everbright Resources Corporation	Reports of deforestation, peat development, peat forest development, clearance prep/Stacking lines in the following concessions: - PT Kapuasindo Palm Industry	Mighty Earth Rapid Response Report 5, 6, 12, 17, 20	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	30-Nov-19
15	Salim Group	Reports of deforestation in the following concessions: - PT Dutra Rendra Mulya	Mighty Earth Rapid Response Report 2	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	30-Nov-19
16	Salim Group	Reports of deforestation in the following concessions: - PT Bintuni Agro Prima Perkasa	Mighty Earth Rapid Response Report 1	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	30-Nov-19
65	Samling	Reports of peat development in the following concessions: - PT Syarikat Samling Timber Sdn	Mighty Earth Rapid Response Report 17, 19, 20	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting was not related to palm oil production.	Suspended	30-Nov-19
100	Salim Group	Reports of deforestation in the following concessions: - PT Agro Subur Permai	Mighty Earth Rapid Response Report 20, 21	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	30-Nov-19

No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
89	Evershine Asset Corporation / Everbright Resources Corporation	Reports of deforestation in the following concessions: - PT Sentrakarya Manunggal	Mighty Earth Rapid Response Report 19	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	23-Sep-19
83	Tunas Baru Lampung	Alleged clearance of forested peatlands.	Chain Reaction Research, Greenpeace	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	26-Aug-19
63	Evershine Asset Corporation & Everbright Resources Corporation	Reports of deforestation in the following concessions: - PT Anugerah Makmur Sejaht	Mighty Earth Rapid Response Report 17	Indirectly via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	15-Aug-19
13	Musirawas Group	Reports of peat development in the following concessions: -PT Sumur Pandanawangi	Mighty Earth Rapid Response Report 6, 10, 11	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
14	Pundi Group	Reports of peat forest development, clearance prep/stacking lines in the following concessions:	Mighty Earth Rapid Response Report 10, 11, 12, 18	Indirectly with parent company via third party suppliers/traders.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
25	Shin Yang group	Reports of deforestation in the following concessions: -LPS/0039 Zedtree SB	Mighty Earth Rapid Response Report 4	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Suspended	13-Jul-19
44	Pundi	Reports of deforestation in the following concessions: - Pundi Lahar Khatulistiwa (480.49 ha)	Mongabay	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	10-Jul-19
47	Industria Chiquibul	Allegations of labor rights violations by palm oil producer Chiquibul in Guatemala.	Reuters	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company.	Suspended	20-Jun-19
281	First Resources	Reports of deforestation claiming connection Rangano Agro Plantation (FAP) Agri, New Borneo and Cianjry Anky Abadi (CAA)	The Gecko Project	Indirect via third party suppliers/traders.	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 separate 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.	Closed	1/31/2024
24	Unknown Group	Reports of deforestation in the following concessions: -PT Condong Garut	Mighty Earth Rapid Response Report 4	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company.	Closed	29-Dec-23
26	Unknown Group	Reports of deforestation, clearance prep,Stracking lines in the following concessions: - PT Krida Dharma Kahuripan	Mighty Earth Rapid Response Report 5, 6, 11, 12	No direct or indirect connection between ADM and the parent company or mill.	PT Condong Garut is owned by Mr. Hutomo Mandala Putra. No deforestation was carried out from 2016-2023., has been considered for removal from the suspended list ADM adopts a no buy position on the company. 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	Closed	29-Dec-23
70	Pinehill Pacific Bhd	Reports of deforestation in the following concessions: -PT Makmur Jaya Malindo	Mighty Earth Rapid Response Report 18, 19, 27, 28	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. We were informed that Pinehill Pacific Bhd has divested their Malaysian operations and they are no longer associated with PT MM. 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	Closed	29-Dec-23
107	PT. Bumi Daya Agrotamas	* Risk of sourcing from the Singki-Banglung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM adopts a no buy position on the company. From 2016-2023, BDA did not carry out deforestation. So, they had no liability.	Closed	29-Dec-23
116	NaturAceles	Allegations with respect to human rights	Reuters	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that he immediately engaged Naturacetes following the allegations. To date, evaluations conducted by neutral third parties have shown that Naturacetes has been in compliance with the sustainable palm oil policy from our supplier.	Closed	29-Dec-23
153	Group Olmea	Reports of human rights violations - Reforestadora de Palma de Peten SA (REPSA)	RAN - Rainforest Action Network	No direct or indirect connection between ADM and the parent company or mill.	ADM adopts a no buy position on the company. The social issues that occurred at REPSA have been resolved. REPSA has been considered for removal from the suspended list in May 2022.	Closed	29-Dec-23
216	Bumi Gading Prima (BGP)	Reports of deforestation and/or peatland development in the following concessions: - PT Bumi Agro	Mighty Earth Rapid Response Report 33	Indirect with parent company via third party suppliers/traders.	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/2Pv9W2E">https://bit.ly/2Pv9W2E</a> . Given the moratorium commitment, PT BAP commitment letter on the moratorium here <a href="https://bit.ly/2Pv9W2E">https://bit.ly/2Pv9W2E</a> . Given the moratorium commitment, our direct supplier has decided to close this case for monitoring. In 2023, Mulla Gading Mas Group did not carry out deforestation. Group has been considered for removal from the suspended list	Closed	29-Dec-23
217	First Resources	Reports of deforestation and/or peatland development in the following concessions: - PT Bumi Agro	Aidenvironment	Indirect with parent company via third party suppliers/traders.	The case is currently under review by the RSPO Complaints Panel. ADM recognizes and heeds the RSPO's Complaints System and is monitoring the outcome through the RSPO case tracker: <a href="https://force.co.uk/wmh/">https://force.co.uk/wmh/</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.	Closed	29-Dec-23
220	Wings Agro	Reports of deforestation and/or peatland development in the following concessions: -PT Gawi Makmur Kalimantan	Mighty Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that the Wings Group has reiterated its commitment to land development guided by and in adherence with HCV and HCS assessments. 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 NDPE commitment and did not carry out deforestation in 2023.	Closed	12/29/2023
240	Jernih Kemboja	Reports of deforestation and/or peatland development in the following concession: - PTD 1815	Mighty Earth Rapid Response Report 38, 40	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation. Effective March 31, 2022, our direct supplier stopped selling 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. Step 2: Concluded investigations have confirmed that there is non-compliance to the No Deforestation commitment in the NDPE Policy. Therefore, our direct supplier, 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 is 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>	Closed	29-Dec-23
241	Sumber Tani Agung Tbk	The company is sourcing from PT Sawai Sukses Sejaht, who allegedly violates NDPE policies.	Mighty Earth Rapid Response Report 39	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT Sawai Sukses Sejaht (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 losses. 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 Teguhkara 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 Sitarakara mill. Sitarakara mill, PT Rimba Mujur Mahkota/Pasifik Agro Sentosa was allegedly sourcing from PT SSS. Sitarakara 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). Our direct supplier has confirmed that PT STA has	Closed	12/29/2023
277	NaturAceles	Allegations with respect to human rights	Christiãe initiative Romero e.V.	Indirect via third party suppliers/traders.	ADM reached out to its supplier for investigation. Our direct supplier provided an official statement by NaturAceles on the allegations raised in February 27, 2023 towards violations to the land rights of the Maya. Naturacetes strongly states its non-involvement or influence in this situation. ADM will continue to monitor the case.	Closed	29-Dec-23
280	Wings Agro	Reports of deforestation and peat development in the following concession: -PT GAWI Makmur Kalimantan	Rapid Response 34	Indirect via third party suppliers/traders.	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 NDPE commitment and did not carry out deforestation in 2023.	Closed	28/12/2023
274	ADM Brazil - BA/PI	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.	On May 2023, ADM received the Realtime Deforestation Monitoring- soy and cattle supply chains #12. Among the 52 farms, ADM made recent negotiations with one of them (Fazenda Tapera). The producer who appears in the report is not an ADM supplier, but we do have commercial relations with other members of the Orti family who owns farms in the region of Corumbá/BA. ADM has covered from one of several C&Bs that make up the Fazenda Tapera in year 2021. The C&B from where we sourced soy has NO embargoed areas. The recently land clearing has all the authorizations/licenses in accordance with the local forest code and has NOT planted SOY yet in the cleared area. The area that has been cleared is not a forest, but conversion of native vegetation. The investigation concluded that there was no sourcing from the reported farms, the analysis was made by remote sensing and consultation of our grain purchase systems. 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.	Closed	18-May-23
223	Chora Agro Resources	Reports of NDPE violations in terms of land rights, labor rights, and environmental concerns in the following concession: -PT Mirra Abidinmas Sejahtera	Local community stakeholders, cooperatives, and oil palm farmers.	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier(s) for investigation. Our direct supplier informed us that they are already engaging with PT MAS. However, PT MAS is currently undergoing a management takeover which will delay investigations. PT MAS has provided clarifications on all allegations raised. A meeting with the grievance roster has been proposed. ADM will continue to monitor this case. Our direct supplier carried out a field visit to PT MAS to investigate the allegations. The grievance team conducted document review, as well as interviews with PT MAS and surrounding communities to verify the allegations. The outcome of the field investigation corroborated the clarifications provided to our direct supplier. In general, PT MAS is operating legally as they have obtained all legal permits, including location permits, plantation business permit (IUP) and land use permit (RKH/GS/RSK). They have also fulfilled their claims obligations as well as provided compensation for land acquisitions to the previous landowner. It is important to note that there are no community settlements, buildings, graves and cemetery houses within the boundaries of PT MAS's IUP and RKH. On the matter of labour conditions, majority of workers are from local communities of Sabah 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.	Closed	29-Mar-23
172	ADM Brazil - AM/MT	Reports of fire events for soy and cattle	Aid Environment - Realtime Deforestation Monitoring- soy and cattle supply chains #8	No direct or indirect connection between ADM and the farms or farmers.	On January 2023, ADM received the Realtime Deforestation Monitoring- soy and cattle supply chains #8. ADM did not source soy from any of the farms listed on the report RDM #8. The analysis was made by remote sensing and consultation of our grain purchase systems.	Closed	28-Feb-23
10	Incasi Raya Group	Reports of deforestation, peat development and peat forest development in the following concessions:	Mighty Earth Rapid Response Report 10	Indirectly with parent company via third party suppliers/traders.	ADM's direct supplier investigation confirmed that their land clearing is guided by the outcome of the assessments. PT SAL has already conducted HCS and HCV since 2017. PT SAL has immediately ceased the land clearing and reiterated their commitment of moratorium. SAL is expected to submit a recovery plan to commensurate with the scale of their non-compliant development. Despite the moratorium since March 2019, there are non-compliance detected in 2019 and 2021 for fires (213 ha) and peat forest clearance (26 ha) respectively.	Closed	27-Feb-23

No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
113	PT. Bangun Sampuna Lestari	• Risk of sourcing from the Singki-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/documented especially on their traceability progress.	Closed	27-Feb-23
109	PT. Perkebunan Lembah Bakti I	• Risk of sourcing from the Singki-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/documented especially on their traceability progress. Sep-21: Perkebunan Lembah Bakti I & II have reached 100% TPP ( <a href="http://www.abna-agro.co.id/en/traceability-4/">http://www.abna-agro.co.id/en/traceability-4/</a> ). Our direct supplier has stated that they are no longer buying from PT. Last Jagat and PT. Indo Sawit Perseka which are deforesting inside the Leuser Ecosystem.	Closed	29-Nov-22
112	PT. Delima Makmur	• Risk of sourcing from the Singki-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM conducted a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool. PT Delima Makmur has a low overall forest risk value. ADM will continue to monitor the development of these values. Direct supplier TPP is 100%, monitoring will be conducted. The disputed land identified by PT Delima Makmur. <a href="http://poa.mn.pjdn.com/attachment/396/35048/77575956460484063078072.html">http://poa.mn.pjdn.com/attachment/396/35048/77575956460484063078072.html</a> . Based on the investigation by the Asah High Prosecutor's Office (Kejaksaan Tinggi Aceh) has dropped the case. Hence, the case against PT DM and the directors has been resolved legally.	Closed	29-Nov-22
154	Permata Hijau	Ommiting mills from mill list that are tied to deforestation	RAN - Rainforest Action Network	Indirect with parent company via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that Permata Hijau acknowledges and regrets this lapse in their mill list. They also commit to cases 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 an auditor to verify their traceability report and will be using a remedial strategy to ensure RAN 80%. Our direct supplier will audit their supply mills that KA has not 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 supply mills have confirmed that KA is not in their supply chain. In addition, according to information received from the field, KA owns and operates its own palm oil, and all FFB from KA's estate are supplied to KA mill. No purchase, our direct suppliers has taken necessary actions to prevent Kalimas Alam mill to be in their supply chain.	Closed	29-Nov-22
268	ADM Brazil - BA	Reports of land clearing for soy and cattle	Aid Environment - Realtime Deforestation Monitoring- soy and cattle supply chains #5	Direct connection between ADM and the farms or farmers.	On September, ADM received from Aid Environment 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 which 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 stopped 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.	Closed	20-Nov-22
269	Group of SOY farmers/growers in Paraguay	Reports of alleged social conflicts between indigenous communities/agrarian reform settlements and SOY farmers.	Global Witness (London, UK)	Direct and indirect soy growers/suppliers	On August 2020, ADM received from Global Witness an email contact requesting explanation on (7) alleged cases of social conflicts between indigenous communities/agrarian reform settlements and SOY farmers who could be link to ADM in different locations in Paraguay indigenous related conflicts: (Hagua Pa) Loma Puro y Campo Aguá's K.A's tiny Colonia Yandú Agrarian reform settlements conflicts. ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the area in question is outside of PT BFP'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 Brhema Brhadesa. Please see the verification report: <a href="https://bit.ly/3yAGNco">https://bit.ly/3yAGNco</a>	Closed	13-Oct-22
221	Triputra Agro Persada	Reports of deforestation and/or peatland development in the following concessions: - PT Brhema Brhadesa	Mighty Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the area in question is outside of PT BFP'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 Brhema Brhadesa. Please see the verification report: <a href="https://bit.ly/3yAGNco">https://bit.ly/3yAGNco</a>	Closed	02-Aug-22
105	PT. Global Sawit Semesta	• Palm oil grown illegally at the expense of the protected peat forests of Rawa Singki Wildlife Reserve in the Singki-Bengkung	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that he is engaging with the PT GSS and a field verification visit has occurred. PT GSS has laid out action plan. A sustainability officer and GSS 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 no material is procured from complaint sources. Another visit by GSS is planned by our direct supplier. The report can be found here: <a href="http://bit.ly/3z8e9r1">http://bit.ly/3z8e9r1</a> An action plan was developed between direct supplier and GSS. It includes mapping of high-risk areas, which will 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 its plantation, respecting land rights and document traceability of FFB suppliers that action will be monitored by direct supplier. An NDPE action has been issued and ATP is 20%	Closed	1-Aug-22
242	Eagle High Plantations Tbk	Reports of deforestation in the following concessions: - PT Khatulistiwa Agro Abadi/ First Borneo Group	Rapid Response 40	Indirect via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT AIS is still in the EOP. Latest Consolidated Financial Statements as receivables and payable due to the absence of an "offset" agreement. However, EHP confirmed that their EOP purchase contract with PT AIS ended in Sep 2023 and EHP have not sold FFB to PT AIS since 01 Dec 2023 and PT AIS is on their no purchase list. Since then, EHP have not entered into transactions with PT AIS. The reason why PT AIS appears on PT EHP annual report/financial statement is because they still have a debt to PT EHP for their previous business transaction before 2023 and that debt is not fully paid. PT AIS and PT EHP have yet reached an agreement on the debt payment, hence, we will still feature PT AIS being mentioned in the financial report until this issue is resolved.	Closed	01-Aug-22
244	ADM Brazil - BA/MA/MT	Realtime Deforestation Monitoring- soy and cattle supply chains #3	Aid Environment	No direct or indirect connection between ADM and the farms or farmers.	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.	Closed	24-Jun-22
270	ADM Brazil - BA/MA/MT	Reports of land clearing for soy and cattle	Aid Environment - Realtime Deforestation Monitoring- soy and cattle supply chains #3	No direct or indirect connection between ADM and the farms or farmers.	On 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.	Closed	24-Jun-22
106	PT. Samudera Sawit Nabati	• Palm oil grown illegally at the expense of the protected peat forests of Rawa Singki Wildlife Reserve in the Singki-Bengkung	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier engaged with PT GSS to seek responses to the allegations contained in the RAN report. Furthermore, PT SSN declared that they did not source from B. 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 violated too. An action plan 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 no material is procured from complaint sources. A third-party will be commissioned to conduct another visit. The report can be found here: <a href="http://bit.ly/3z8e9r1">http://bit.ly/3z8e9r1</a>	Closed	26-May-22
114	PT. Nafasindo	• Risk of sourcing from the Singki-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/documented especially on their traceability progress.	Closed	26-May-22
182	Camping Tiga	Camping Tiga - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	Taufanudin provided clarification regarding the BAA allegations. It was explained that there was an error due to wrong data being used by the provincial authority (BPN Karwat Prop-Asah). Taufanudin explained that in 2016, the company acting on the provincial and district governments' letter received 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.	Closed	26-May-22
212	Bunga	Reports of deforestation and/or peatland development in the following concessions: - PT Garuda Kencana	Mighty Earth Rapid Response Report 32	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they are working VY Plantations to identify any potential NDPE violations in the concession in question. ADM will continue to monitor this case.	Closed	26-May-22
213	Yayasan Pelajaran Johor (Johor State Government)	Reports of deforestation and/or peatland development in the following concessions: - YP Plantations Sdn Bhd (Ladang)	Mighty Earth Rapid Response Report 32	Indirect via third party suppliers/traders	Rawa Ganes has a commitment to the development of a recreation area for non-consultant land clearance to NDPE solely at animal land. ADM considers this case closed.	Closed	26-May-22
233	Incasi Raya	Reports of NDPE violations in the following concessions: - Sumbang Andaha Kencana	Tempo, Mongabay Indonesia, Betahita, and Auriga Nusantara	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. ADM is requesting information from direct supplier to clarify the situation.	Closed	04-Mar-22
34	Perkebunan Nusantara	Reports of deforestation in the following concessions: - PT Perkebunan Nusantara II Prati	Mighty Earth Rapid Response Report 15	Indirect with parent company via third party suppliers/traders.	Our direct supplier informed us that PT Perkebunan Nusantara has deleted the concession since 2014.	Closed	28-Jan-22
37	TH Plantations Bhd	Reports of deforestation in the following concessions: - Ladang Tabung Haji	Mighty Earth Rapid Response Report 15, 18, 20	Indirect with parent company via third party suppliers/traders.	Our direct supplier informed us that the concession Ladang Tabung Haji doesn't belong to TH Plantation but had since 2002 after it was divested to a non-related party.	Closed	28-Jan-22
40	Genting Plantations Bhd	Reports of deforestation in the following concessions: - PT Permata Sawit Mandiri	Mighty Earth Rapid Response Report 15, 17, 19, 20, 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the concession PT Permata Sawit Mandiri doesn't belong to Genting Plantation Bhd since 2017 after it was divested to a non-related party. Genting Plantation's official statement can be found here: <a href="http://bit.ly/3z8e9r1">http://bit.ly/3z8e9r1</a>	Closed	28-Jan-22
122	Makin	Reports of deforestation in the following concessions: - PT Caca Kencana Khatungan	Mighty Earth Rapid Response Report 21, 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT CCK ceased operations in 2014, and the land in question has been returned to the government. PT CCK had not performed any activity on the land. A notariated letter showing the company had ceased operations in 2014 was provided.	Closed	28-Jan-22
125	TSH Resources Bhd	Reports of deforestation in the following concessions: - PT Caca Kencana Khatungan	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that TSH Resources Bhd adhere to their no burning policy as an NPDP member. TSH Resources commissioned Malaysian Environmental Consultants (MEC) which found that the clearing overlaps with recent massive local community land burning in Kalimantan Utara.	Closed	28-Jan-22
131	Bumitama Group	Reports of deforestation in the following concessions: - PT Damai Agro Sejahtera	Mighty Earth Rapid Response Report 22, 23, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT DAS patrols recorded illegal logging activity in the area prior to the incident. The illegal activity has been reported to the police. In addition, the area was also impacted by forest fires in the dry season of 2019. Bumitama has an NDPE and is an ISO 9001 member. The official response can be found here: <a href="http://bit.ly/3z8e9r1">http://bit.ly/3z8e9r1</a>	Closed	28-Jan-22
132	Eagle High Plantations Tbk	Reports of deforestation in the following concessions: - PT Artu Energi Resources	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT AER has accepted field fire that came from outside of their concession to the extent of 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="http://bit.ly/3z8e9r1">http://bit.ly/3z8e9r1</a>	Closed	28-Jan-22
139	Sampoerna Agro	Reports of deforestation in the following concessions: - PT Usaha Agro Indonesia	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT UA is not involved in any deforestation activity. The land in question belongs to the community, and the landowners do not intend to turn over their land to the company. Sampoerna Agro has an NDPE commitment in place.	Closed	28-Jan-22
141	Bumitama Group	Reports of deforestation and/or peatland development in the following concessions: - PT Temisa Agro Abadi	Mighty Earth Rapid Response Report 23	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land changes were caused by forest fires due to dry season conditions. PT AMM responded to these fires in fact as possible with their fire-response personnel. The incidents were reported to local authorities as well as the NPDP. Bumitama follows HCV/NCV approach and the NPDP by the RPO as well as working together with local communities.	Closed	28-Jan-22
7	Field Global Ventures Holding Bhd	Reports of peat development in the following concessions: - PT Temisa Agro Abadi	Mighty Earth Rapid Response Report 9	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land changes were caused by forest fires due to dry season conditions. PT AMM responded to these fires in fact as possible with their fire-response personnel. The incidents were reported to local authorities as well as the NPDP. Bumitama follows HCV/NCV approach and the NPDP by the RPO as well as working together with local communities. Bumitama's further clarification on the land affiliation: <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a>	Closed	20-Dec-21
237	Musim Mas	Reports of deforestation and/or peatland development in the following concessions: - PT Mupersada Gatramegah	Mighty Earth Rapid Response Report 37	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct suppliers for investigation. Our direct suppliers informed us that area identified in the report is neither HCV nor HCS area. This area has been assessed and covered under the following assessment reports: a) HCV report of PT Murnia Agro Lestari ( <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a> ) that has obtained satisfactory status (note: the area was part of PT Murnia Agro Lestari, which PT MPO officially acquired on 1st April 2023); b) HCS report of PT Mupersada Gatramegah ( <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a> ) has covered the area in question ( <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a> ) which has completed HCS review process ( <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a> ); c) This area has also undergone the RPO NPDP process ( <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a> ). All reports are published and available on HCV/HR, HCS, and RPOD website, respectively.	Closed	20-Dec-21
238	Dharma Sarya Nusantara Tbk (DSN)	Reports of deforestation and/or peatland development in the following concessions: - PT Murnia Agro Lestari	Mighty Earth Rapid Response Report 37	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that PT Murnia Agro Lestari (KAP) parent's group, Dharma Sarya Nusantara Tbk (DSN) is a member of RPO since 2008, and all of their land development for palm is bound by RPO Principles and Criteria. DSN has also made public commitment to NDPE policy ( <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a> ) where their last land clearing activities was in 2015. Specifically on the case on PT SAR, our direct supplier has initiated engagement with DSN since October 2021 to seek clarification on deforestation audit detected through their internal monitoring program. PT KAP has carried out field investigation and confirmed that the clearance was carried out by local communities for farming, including ganyu planting, the area in question has not been surrendered to the company as the local communities are not seen to be involved in oil palm development. Therefore, PT KAP does not have full control over the land area. The outcome of the investigation has also been shared with the head village and endorsed ( <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a> ) by the head village accordingly. PT KAP's official response to the case is available here: <a href="https://www.heldocs.com/issuance/100423-10201/">https://www.heldocs.com/issuance/100423-10201/</a>	Closed	20-Dec-21
1	Anglo-Eastern Plantations	Reports of deforestation in the following concessions: - PT Khatyan Agro Plantation	Mighty Earth Rapid Response Report 1, 14, 15, 16, 19, 20, 23, 25, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that their internal monitoring detected indications of land clearance in KAP concessions (4) in July from May to June 2019. Subsequently, Mighty Earth Rapid Response Report No.18 also mentioned 6 ha land clearing from June 15-July 25 2020 using GLEK Aerial coverage. Our direct supplier informed ASP and their team reviewed that field reported land clearing activities since the moratorium announcement at the end of May 2020. Our direct supplier checked the exact date of the indication of the land clearing and found ASP's statement was verified. HCS assessment and peer review has been completed and verified. The HCS assessment and peer review are in the process of discussing further activities. PT KAP has not written confirmation regarding HCS area after investigation, so we need clearing was discussed. HCS assessment and peer review has been completed and verified. The HCS assessment and peer review are in the process of discussing further activities. ADM will continue to monitor this process. A memorandum for the disputed area is in place as of May 5, 2020: <a href="https://bit.ly/3z8e9r1">https://bit.ly/3z8e9r1</a>	Closed	28-Oct-21
148	Capitol Group	Reports of deforestation and/or peatland development in the following concessions: - PT Murnia Agro Lestari	Mighty Earth Rapid Response Report 25, 26, 27, 28, 29	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier informed us that HCV/HCS has already been conducted by a certified assessor, and the company has clarified that their land clearing was guided by the outcome of the assessments. However, some of land clearance appears to have occurred inside of HCV/HCS areas due to community pressure to develop a palm plantation program. PT MPO is agreed to rehabilitate the identified areas of land clearing in the recent HCV/HCS reports. PT MPO is working closely with the Indonesian Realtime Monitoring Agency (RPOA) and has committed to plant 10,000 trees as part of its rehabilitation program. The HCV/HCS report shall be submitted for peer review and a moratorium on any further land	Closed	28-Oct-21

No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
193	Persada Alam Jaya	Persada Alam Jaya - Purchasing FFB grown illegally	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2024. 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 Kutera Sawit (collaboration with our partner Kottan). PT PAJ reported to our direct supplier that it has achieved 80% TTP for the period of Jan 2020 and is on track to achieve 100% traceability by end 2020. In April, Persada reported that it has achieved 100% TTP. Considering the progress PT PAJ has made, ADM considers this case closed.	Closed	28-Oct-21
235	Yayasan Sabah	Reports of deforestation and/or peatland development in the following concessions: - Innoresc Plantations Bhd	Mighty Earth Rapid Response Report 36	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they were investigating the case prior to the publication of Rapid Response Report 36, and the outcome of the investigation found that the land development was not related to oil palm operation, but rather to peat planting activities (Nesamarcia cadamba). Conservation maps, and annual work plans approved by Sabah Forestry Department (SFD), and field visit reports were provided.	Closed	28-Oct-21
211	SIPEF	Reports of deforestation and/or peatland development in the following concessions: - PT Kresna Data Agrindo	Mighty Earth Rapid Response Report 32	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have already been in contact with SIPEF who provided report on the case: <a href="https://bit.ly/3u3yG0N">https://bit.ly/3u3yG0N</a> . It outlines that SIPEF is within its rights and has undertaken all necessary assessments and preparations. 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 HCSA 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/3W55544">https://bit.ly/3W55544</a> .	Closed	15-Sep-21
224	Bukit Asam	Reports of deforestation and/or peatland development in the following concessions: - PT Kresna Data Agrindo	Mighty Earth Rapid Response Report 35	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that their ISP 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 consist of rubber or 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 monitoring. Subsequent assessments will have to be carried out prior ensuring their land clearing to ensure their compliance to NDPE.	Closed	15-Sep-21
226	PT SMART Tbk (GAR)	Reports of NDPE violations in the following concessions: - PT Kresna Data Agrindo	Forest Peoples Programme: Demanding accountability	Direct with parent company.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that there are no outstanding disputes with the community and KDA. Other issues listed in the report have been addressed and closed. KDA obtains all operational permits necessary, and monitors and audits its environmental impact assessment (AMDAL) requirements every six months. Monthly audits to ensure that requirements set by authorities are complied with are also conducted. Pricing of FFB is conducted using the price of the Indonesian Plantation Department as a reference and open market pricing. Final prices are openly communicated to farmer groups, farmer groups, and agents.	Closed	15-Sep-21
229	PT Kurnia Luwuk Sejati	Reports of NDPE violations in the following concessions: - PT Kurnia Luwuk Sejati	Forest Peoples Programme: Demanding accountability	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that in 2020 the community held a demonstration regarding PT KLS' business activities on allegedly illegally owned land. During the demonstration there was destruction of property and machinery by the local community. Therefore, law enforcement and authorities were involved to settle the dispute.	Closed	15-Sep-21
230	PT Cipta Cakra Murdaya	Reports of NDPE violations in the following concessions: - PT Hardaya Inti Plantation	Forest Peoples Programme: Demanding accountability	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the case from 2013 was fully settled in 2014 through mediation by regional and provincial governments. PT HCP 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. RCL documents to guide their operational practices. The plantation has also achieved GPO certification since 2017, reaffirming their sustainability commitments and compliance to the relevant legal framework.	Closed	15-Sep-21
49	Case 10 in Report Incasai Raya	Reports of deforestation in the following concessions: - PT Averna Sepakat	Mighty Earth Rapid Response Report 17	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that it was not PT Averna Sepakat, but the local community of Kelompok Singa who illegally encroached the area. A police report was filed. An investigation was launched, and according to Maimunin, the local community has agreed to stop all activities in the PT Averna Sepakat concession.	Closed	31-Jul-21
108	PT. Enseem Sawita Lestari	Risk of sourcing from the Singki-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. Our direct supplier conducted several field visits, and through collaboration with other stakeholders, action plans have been laid out. PT ES started working with TTP. PT ES informed our direct supplier that they have achieved 100% TTP as of September 2020.	Closed	31-Jul-21
111	PT. Runding Putra Persada	Risk of sourcing from the Singki-Bengkung region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have sent a letter to them to make sure they are aware of the issue and ask for actions taken/planned especially on their traceability progress. A third-party trader conducted a field visit and confirmed that the FFB was not supplied to PT Runding Putra Persada during the 2018 deforestation period.	Closed	31-Jul-21
128	Rimbunan Hijau	Reports of deforestation in the following concessions: - Rimbunan Sawit Sdn Bhd (Simunjan Estate)	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the encroachment on the land was by local communities. ADM will continue to monitor the case. Our direct supplier informed us that the encroachment on the land was by local communities. RSI submitted their NDPE policy to our supplier.	Closed	31-Jul-21
163	PT Teupin Lada	The company was found to be sourcing from PT Indo Alan, who violates NDPE policies.	RAN - Rainforest Action Network	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that they have met and engaged with PT Teupin Lada on this issue. They agreed to cease sourcing from PT Indo Alan effectively immediately. ADM will continue to monitor the supplier. PT TL informed our supplier that they have achieved 100% TTP.	Closed	31-Jul-21
214	Bukit Barisan Indah Prima	Reports of land conflicts involving the Earth Netherlands - PT Artha Prigel	Milieudefensie - Friends of the Earth Netherlands	Indirect with parent company via third party suppliers/traders.	ADM's direct supplier began engaging with Bukit Barisan Indah Prima (BBIP) in Q1 2020. Although PT Artha Prigel holds the legal land rights, conflicts with community members continued. A mediation process was started and included various key stakeholders: Lahat District Government, South Sumatra Provincial Government, the Police Department, the National Land Agency and some relevant government authorities. Due to violent conflicts ensuing, PT AP filed a police report regarding the attack. Discussions are currently ongoing with those involved. As a result of verification assessments, PT AP was able to show evidence of legal rights and mediation process.	Closed	31-Jul-21
219	Rajawali Group/ Eagle High Plantations	Reports of deforestation and/or peatland development in the following concessions: - PT Tandari Sawit Papua	Might Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the land clearing was initiated by leaders of the Yaumutan village. It was intended for expansion of the village, and it was not communicated to 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/3p4q9wR">https://bit.ly/3p4q9wR</a> .	Closed	31-Jul-21
222	Rimbunan Hijau	Reports of deforestation and/or peatland development in the following concessions: - Rimbunan Hijau LFP 0026	Might Earth Rapid Response Report 34	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the land clearing is not related to oil palm development.	Closed	31-Jul-21
23	Widya Corporation	Reports of deforestation, clearance prep/stacking line in the following concessions: - PT Mulia Inti Perkasa	Mighty Earth Rapid Response Report 6, 15, 16, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29	No direct or indirect connection between ADM and the parent company or mill.	ADM's direct supplier has been engaging with PT MP since the end of 2017. PT MP 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/3p4q9wR">https://bit.ly/3p4q9wR</a> .	Closed	30-Jun-21
119	First Resources	Reports of deforestation in the following concessions: - PT Ketagang Agro Lestari	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that a HCV/HCS assessment had been conducted by PT KAL, and the land development was carried out based on the results. After ground verification, it was identified that "0.6 hectare of land, recommended for conservation, was cleared. This land was rehabilitated once it was identified.	Closed	30-Jun-21
215	Astra International Tbk	Reports of deforestation and/or peatland development in the following concessions: - PT Agincourt Resources Tbk	Mighty Earth Rapid Response Report 33	Indirect via third party suppliers/traders.	ADM reached out to its direct suppliers for investigation. Investigations have shown that the allegations against PT Agincourt are related to the mining industry, not the palm oil industry. PT Agincourt is a different company to Astra Agro Lestari. ADM does not source any commodities from the mining industry and therefore has no connection to PT Agincourt.	Closed	30-Jun-21
51	Dharma Sawit Nusantara Tbk (DSN Group)	Reports of deforestation in the following concessions: - PT Prima Sawit Andalan	Mighty Earth Rapid Response Report 17	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. The land clearing was not conducted by DSN as they have a moratorium in place since 2015. The land was illegally encroached and cleared by communities from Dusun Tembaga and Desa Sungai Buluh, for the planting of paddy field. DSN has already reported the case to the local authorities and copies of the reports had also been shared with our direct supplier. ADM is monitoring the progress through direct suppliers and public communications. The REDO has published revised boundaries of PT PSA.	Closed	26-Feb-21
72	Rimbunan Hijau	Reports of peat development and clearance prep/stacking lines in the following concessions: - Erajaya Synergy Sdn Bhd (Laxsa division, part of LFP/0029)	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing was mainly conducted by local communities and a small portion for non-palm related operations.	Closed	26-Feb-21
169	Perbadanan Kemasaj Pertanian Negeri Pahang	Reports of deforestation and/or peatland development in the following concessions: - PKPP Plantation Sdn Bhd	Mighty Earth Rapid Response Report 31	Indirect via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PKPP is not a supplier to them based on the group ownership definition of the REDO: <a href="https://bit.ly/3d488Ww">https://bit.ly/3d488Ww</a> <a href="https://bit.ly/3ka26D2">https://bit.ly/3ka26D2</a>	Closed	26-Feb-21
156	Perbadanan Kemasaj Pertanian Negeri Pahang (owner of LKPP Corporation Sdn Bhd)	Reports of deforestation and/or peatland development in the following concessions: - PKPP Plantation Sdn Bhd	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they have engaged with PKPP, who has agreed to stop all land clearing at the Sungai Charu concession. Additionally, PKPP management has set aside two land banks located at Lipin, Pahang (426 ha) and Pekan, Pahang (130 ha) for its recovery plan. PKPP as well as LKPP has publicly available NDPE policies and commitments in place.	Closed	29-Jan-21
157	Instant Star Holdings Sdn Bhd	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that ISM 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 2013 and recent activities were related to construction of infrastructure. ISM has in the meantime suspended supply from the FFB supplier, while investigations are ongoing. Satria Bramaja (SB) has reassured its commitment to NDPE and relevant assessment prior to any land clearing. No land clearing was detected.	Closed	29-Jan-21
158	Instant Star Holdings Sdn Bhd	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that ISM 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 2013 and recent activities were related to construction of infrastructure. ISM has in the meantime suspended supply from the FFB supplier, while investigations are ongoing. Satria Bramaja (SB) has reassured its commitment to NDPE and relevant assessment prior to any land clearing. No land clearing was detected.	Closed	29-Jan-21
159	Amanah Saham Pahang	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.	Closed	29-Jan-21
160	Amanah Saham Pahang	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.	Closed	29-Jan-21
161	Amanah Saham Pahang	Reports of deforestation and/or peatland development in the following concessions: - Aspirasi Kristal (M) Sdn Bhd (area)	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that Amanah Saham Pahang Berhad (ASPA) has committed to implement an NDPE policy which has already been shared. ASPA has also imposed a moratorium on land clearing.	Closed	29-Jan-21
162	Yayasan Pahang	Reports of deforestation and/or peatland development in the following concessions: - YP Plantation Sdn Bhd	Mighty Earth Rapid Response Report 30	Indirect via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that 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://ypp.com.my/4/pdai-mmpa/W599933720116-429461da-05dd">https://ypp.com.my/4/pdai-mmpa/W599933720116-429461da-05dd</a>	Closed	29-Jan-21

No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
170	Perbadanan Kemajuan Pertanian Negeri Pahang (owner of LKPP Corporation Sdn Bhd)	Reports of deforestation and/or peatland development in the following concessions: - PKPP Plantation Sdn Bhd	Mighty Earth Rapid Response Report 31	Indirect with third party suppliers/traders	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they have engaged with PPPP who has committed to cease all clearing. Additionally, two lots of their land will be reserved for potential recovery sites. PPPP is also collaborating with a local university (UTM) on a conservation project in the area covering approximately 40 acres. PPPP as an LKPP have publicly available NDPE policies and commitments in place.	Closed	29-Jan-21
202	Wilmar International Ltd	Bumi Swait Kencana - Land dispute, intimidations, violent confrontation	Global Witness	Direct with parent company.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that all allegations and disputes have undergone the appropriate legal processes and/or land compensation payments. Intimidations and violent confrontations were not initiated but resolved by PT BSK security officers and a special operations unit of the Indonesian National Police (BRMOR). Our direct supplier also provided a detailed account of all occurrences and outcomes to Global Witness.	Closed	07-Jan-21
203	Kuala Lumpur Kepong Bhd	Jabontars Eka Karsa - Deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The previous owner started an oil palm plantation on the eastern portion of the estate in 2007. It was later abandoned. 2. Wilmar KL took over in 2008. This area was registered. Subsequently, after a HCV assessment was conducted in 2012, KCK continued to develop the remaining areas of Jabontars estate until 2014. 3. The HCV assessment has revealed a total area of about 1,000 ha have demonstrated and set aside for conservation, which is approximately 35% of the HCV area. 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 Sejahtera conducts regular air quality monitoring every six months, which cover: 1. Ambient Air Quality 2. Results of event	Closed	07-Jan-21
204	Kencana Utama Sejahtera	Kencana Utama Sejahtera - Air pollution	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. PT Kencana 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 Batak Crikung river water with the Quality Standard used is PP No.82 of 2008, 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. ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority). 2. For the allegation of FFB theft, and conflict between local community members and Estate security, the case has been closed since settlement was reached by both parties (Company and Dayak Customary Council/Dewan Adat Dayak).	Closed	07-Jan-21
205	Kharisma Agro Sejahtera	Kharisma Agro Sejahtera - Waste dumping, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. PT Kharisma Agro Sejahtera (KAS) has clarified that the allegations are untrue. 2. PT KAS has submitted evidence of the results of the analysis of river water quality tests for the period June 2017 and December 2017. The sample of Batak Crikung river water with the Quality Standard used is PP No.82 of 2008, 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. ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority). 2. For the allegation of FFB theft, and conflict between local community members and Estate security, the case has been closed since settlement was reached by both parties (Company and Dayak Customary Council/Dewan Adat Dayak).	Closed	07-Jan-21
206	Wilmar International Ltd	Musitika Sembuluh 1 - Land dispute, waste dumping, indigenous persons affected	Global Witness	Direct with parent company.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority). 2. For the allegation of FFB theft, and conflict between local community members and Estate security, the case has been closed since settlement was reached by both parties (Company and Dayak Customary Council/Dewan Adat Dayak).	Closed	07-Jan-21
207	Wilmar International Ltd	Musitika Sembuluh 2 - Land dispute, waste dumping, indigenous persons affected	Global Witness	Direct with parent company.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that: 1. The case has already been closed after verification was carried out by Dinas Lingkungan Hidup (State Environmental Authority). 2. For the allegation of FFB theft, and conflict between local community members and Estate security, the case has been closed since settlement was reached by both parties (Company and Dayak Customary Council/Dewan Adat Dayak).	Closed	07-Jan-21
167	Tradewinds Plantation Phd.	The mill Binu Plantations seems to be linked to deforestation in the Binu Plantations Bhd. Sdn.	Activist	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted 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 individual/community.	Closed	07-Dec-20
168	Sime Darby	The mill Layang (SOU III) seems to be linked to deforestation in the Layang estate concession	Activist	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that their team has checked and confirmed that the clearing detected happened outside of Sime Darby's Layang estate boundary. The boundary marked by GPS in blue is not accurate as it overlapped with the boundary of a neighbour (external party) by the name of Warisan Sedar. The clearing detected was 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 transparency tool at the below link. In the search box, type in "E.Layang". <a href="https://id.platium.maps.amg.com/apps/wilmapswp/portal/index.html?hp=020473a88494673d0a1fa010a711">https://id.platium.maps.amg.com/apps/wilmapswp/portal/index.html?hp=020473a88494673d0a1fa010a711</a>	Closed	07-Dec-20
171	Abdi Budi Mulla	Abdi Budi Mulla 1 - Land dispute, waste dumping, other environmental infractions	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2015. Based on the assessment, an action plan and a number of development programs were developed. PT ABM confirmed to our direct supplier that they do not have a waste problem, and that all issues regarding community demonstrations were submitted to the responsible authorities.	Closed	07-Dec-20
172	Abdi Budi Mulla	Abdi Budi Mulla 2 - Land dispute, waste dumping, other environmental infractions	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2015. Based on the assessment, an action plan and a number of development programs were developed. PT ABM confirmed to our direct supplier that they do not have a waste problem, and that all issues regarding community demonstrations were submitted to the responsible authorities.	Closed	07-Dec-20
173	Adimulia	Adimulia Agrolestari - Land dispute, watershed violations	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they reached out to AA, who confirmed that the watershed is no longer a problem. It has been managed according to applicable protocol. AA is SPO certified and regularly audited by the HSPD. Therefore, all protocols, especially those related to waste management have been addressed through supervision of the HSPD auditor.	Closed	07-Dec-20
174	Agro Wijaya Industri	Agro Wijaya Industri - Waste dumping, operating without a permit	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the DPRD (a member of the house of people representative in the region) has made an inspection visit to PT AWI together with the Environment Agency in Mearang. From the results of the PT AWI waste sample test, it is within the acceptable limits.	Closed	07-Dec-20
175	Ango Duo Sawit/Mewah	Ango Duo Sawit - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they conducted a site visit in 2016. Based on the assessment, an action plan and a number of development programs were developed. The report provided further recommendations to enable PT AOS and its supply chains to implement remedial practices. The corrective actions are intended as an opportunity to work together with ADM's direct supplier to make transformations throughout their supply chain to meet its sustainability policy.	Closed	07-Dec-20
176	Archipelago Timur Abadi	Archipelago Timur Abadi - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.	Closed	07-Dec-20
177	Kencana Persada Nusantara	Arya Rama Prakarsa - Land dispute, deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	This case was reported to law enforcement and went through the due process of law. ADM considers this case closed.	Closed	07-Dec-20
178	Paramitra Internusa Pratama	Belian Mill - Land dispute, deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that they notified the Forest Peoples Programme (FPP) and the HPO of its intention to submit New Planting Procedure (NPP) documents for plasma development in PT Paramitra Internusa Pratama (PT PIP) following public consultations. The HPO informed our direct supplier that plasma development in PT PIP can proceed. Our direct supplier continues active dialogue with the FPP.	Closed	07-Dec-20
180	Berkat Sawit Sejahtera	Berkat Sawit Sejahtera (Inhil) - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	Research on this case has shown that the main issue raised is that BSS does not know whom to compensate. BSS paid for the land they operate on and are willing to compensate those who should be compensated.	Closed	07-Dec-20
181	Beurata Subur Persada	Beurata Subur Persada - Waste dumping	Global Witness	Global Witness	Our direct supplier states that BPP has been engaged with since 2015/2017. A verification visit was conducted in 2017 to follow up on a proposed action plan: <a href="http://bit.ly/2Kqz2n1">http://bit.ly/2Kqz2n1</a> A mitigation and NDPE commitment has been in place since early 2020: <a href="https://bit.ly/3W5G36g">https://bit.ly/3W5G36g</a> The overflow occurred due to heavy rain which the embankment Batuauul could not withstand. The embankment has been raised and built with better material.	Closed	07-Dec-20
183	Ciptamas Bumi Selaras	Ciptamas Bumi Selaras - Land dispute, waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the Bengkulu Province Horticultural and Plantation Food Crops Office conducted mediation during a meeting on April 4, 2019 which was attended by community representatives from Kulik Sialang Hamlet, PT CBS, Kaur Regency Land Office, NODDA 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 Terasi land in the PT CBS concession area to be able to show a copy of proof of their land ownership held by PT CBS, so if the Terasi land has never been held by PT CBS, PT CBS can conduct an Eviction process on the land. However, until now PT CBS has not received a copy.	Closed	07-Dec-20
184	Citra Sawit Harum	Citra Swait Harum - Land dispute, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that CSH has committed to NDPE policy. The status of the Citra Harum Swait 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 Swait 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 Swait also recruits them as employees. Our direct supplier also works with local communities to transport FFB.	Closed	07-Dec-20
186	Hutan Alam Lestari	Hutan Alam Lestari - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that based on the recommendation from the Forestry Service, it was stated that the PT. HAL is located in the APL area covering 4,690 hectares and in the Production Forest Area covering an area of 1,810 hectares. The part of the land that is included in the Production Forest area is not cultured.	Closed	07-Dec-20
187	Indomas Mitra Teknik	Indomas Mitra Teknik - Deforestation	Global Witness	Global Witness	A site visit was conducted in 2018, which verified that PT IMT did not source from PT Lant Bango: <a href="https://bit.ly/3aCvRll">https://bit.ly/3aCvRll</a>	Closed	07-Dec-20
188	Ja Wattie/ Kintap Jaya Wattindo	Kintap Jaya Wattindo - Land dispute, criminalisation, deforestation	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the company has withdrawn from the area and there are local roles and institution set up to protect community rights.	Closed	07-Dec-20
190	Minanga Ogan	Minanga Ogan - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that employee payroll is usually carried out between the 20th to the end of the following month (for payment of the previous month's period). For example, May 2019 wages are paid from June 20 to the end of June with a separate payment according to Employee status in order to facilitate the implementation. Due to the company's financial situation (especially in semester 1 of 2019), the payroll period has been postponed and this has been communicated to the employees. Due to the environmental issues, a review has been carried out regarding the implementation of the employees' water to consume the company's financial condition and the employees' needs.	Closed	07-Dec-20
191	Multiguna Lestari Abadi	Multiguna Lestari Abadi - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that based on the Suluho Lab test, all quality standards are still in accordance with the standards. However, MCLA also realizes that the Redeh River is widely used by people who bathe and are used for drinking water as well, therefore MCLA makes land applications to plantations around the factory for liquid waste disposal. MCLA has also been checked by the Dinas Lingkungan Prahine (the Environmental Agency) and the results are clear.	Closed	07-Dec-20
192	Parasawita	Parasawita - Land dispute, evictions, criminalization	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the news are related to PT Fagala (not Parasawita). The area used to be part of PT Parasawita but has been sold to PT Fagala.	Closed	07-Dec-20
194	Raja Marga	Raja Marga - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that a site visit was conducted and a report and an action plan for RM was developed: <a href="https://bit.ly/3HtQ98s">https://bit.ly/3HtQ98s</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.	Closed	07-Dec-20



No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
196	Sumber Sawit Nusantara	Sumber Sawit Nusantara - Land dispute	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that according to SKN, the case is only a public accusation and is not based on valid evidence. The CPID member (house of representative in the area) has made a visit to the company and was invited to see the conditions directly in the field and it turns out that the allegations are not substantiated.	Closed	07-Dec-20
197	Surya Utama Nabati	Surya Utama Nabati - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that BUD (Environmental agency in the area) has conducted an audit, and the BOD and CDD levels still meet the quality standard. The distance between the waste pond and the well is more than 500 meters and is also separated by a river.	Closed	07-Dec-20
198	Syakath Agro	Syakath Agro - Waste dumping	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the waste-related issue has been resolved. A Liquid Waste Disposal Permit (PLC) was issued in December 2019.	Closed	07-Dec-20
200	SIPEF	Tolan Tiga Indonesia - Land dispute, evictions, criminalisation	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. Our direct supplier informed us that the articles mention a recent demonstration at the premises of PT Tolan Tiga Indonesia. This was a follow up action by Kelompok Tani Beras (KTB) over an old claim which has gone through many years of communications and has long settled in court over 20 years ago. To date there have been at least 3 demonstrations, all involving 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 voice their concerns. Based on the witness, videos and photographic evidence provided the police have arrested the suspects.	Closed	07-Dec-20
201	GOLDEN AGR/ Ivo Mas Tunggal	Ujung Tanjung - Land grab, indigenous persons affected	Global Witness	Indirect with parent company via third party suppliers/traders.	ADM reached out to its direct supplier for investigation. ADM was informed by its direct supplier that: - The land had been acquired legally by Ivo Mas Tunggal and this has been explained and clarified to the rearer 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. Ivo Mas Tunggal. This is corroborated by Ministry of Forestry Decree No. 036 / Jgs / 90 dated January 20, 1990. The company has also provided compensation for the community's land.	Closed	07-Dec-20
27	Wings Group Indonesia	Reports of deforestation in the following concessions: -PT Sentosa Suksesutama	Mighty Earth Rapid Response Report 12	No direct or indirect connection between ADM and the parent company or mill.	ADM, its direct supplier, and the Wings Group discussed previous allegations and the progress made by the Wings Group since its suspension by ADM through a video call. ADM was satisfied that its re-entry criteria was met. HCSA assessments and concession/HGU maps were shared.	Closed	31-Aug-20
155	Rimbanan Hijau	Reports of deforestation and/or peatland development in the following concessions:	Mighty Earth Rapid Response Report 29	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land is still owned by local smallholders, not by PTP Palta Lunda, Perastion Sdn Bhd. The land clearing was conducted by the local smallholders.	Closed	31-Aug-20
99	Surya Dumai	Reports of clearance prep/stacking lines in the following concessions: - PT Kalimantan Agro Kencana	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that PT KAK is not part of Surya Dumai.	Closed	31-Jul-20
110	PT. Perkebunan Lembah Bakti II	- Risk of sourcing from the Singkil-Bengkulu region of the Leuser Ecosystem	RAN - Rainforest Action Network	Indirect via third party suppliers/traders	PT Perkebunan Lembah Bakti II does not appear in ADM's mill list. However, ADM will continue to monitor high risk mills through a risk analysis of its mill list using the Global Forest Watch Pro Palm Risk Analysis Tool.	Closed	31-Jul-20
4	BLD Plantation	Reports of peat forest in the following concessions: -BLD Plantation	Mighty Earth Rapid Response Report 4, 5, 6, 7, 11	Indirectly with parent company via third party suppliers/traders.	BLDP has been working with Earthworm Foundation (EF) and has published their Sustainable Palm Oil Policy with NDPE commitments in May 2019 ( <a href="http://www.blbp.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf">http://www.blbp.com.my/downloads/BLDP_Sustainable_Palm_Oil_Policy.pdf</a> ) EF is the advisor 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 FCO assessment will be conducted for all future developments. ADM considers this case closed but continues to monitor the progress through direct suppliers and public communications.	Closed	29-Jun-20
6	Fangino Agro Plantation Group	Reports of deforestation in the following concessions: - PT Ketapang Hijau Lestari	Mighty Earth Rapid Response Report 9	Indirectly with parent company via third party suppliers/traders.	HCS/HCV assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organization with the HCSA. Based on our supplier's monitoring system, there was no land clearing at the HCV/HCSS area identified at the integrated HCV/HCSS map. FAP adopted a NDPE policy as well as other environmental certifications: <a href="http://fap-agn.com/kabupaten/">http://fap-agn.com/kabupaten/</a> <a href="http://fap-agn.com/kegiatan/">http://fap-agn.com/kegiatan/</a>	Closed	29-Jun-20
8	KPN (formerly GAMA)	Mighty Earth Rapid Response Report 3, 20	Indirect with parent company via third party suppliers/traders.	ADM considers this case close but continues to monitor the progress through direct suppliers and public communications. Gama has changed its name to KPN Plantation. The area in question are outside PT Agrinus Perasa Muda's HGU concession area. This land clearing was carried out by communities for farming, and by PT. BPUF (Bungun Biru Utama Papua) for road construction. Please find documentation below: <a href="http://fapplantation.com/assets/Gama/Kelembagaan/PT_APM_-_Spital_Ground_Check.pdf">http://fapplantation.com/assets/Gama/Kelembagaan/PT_APM_-_Spital_Ground_Check.pdf</a>	Closed	29-Jun-20	
9	GAMA Group	Reports of deforestation in the following concessions: -PT Airgirima Cipta Persada	Mighty Earth Rapid Response Report 3, 4	Indirect with parent company via third party suppliers/traders.	Gama has changed its name to KPN Plantation. Therefore, the below mentioned information was retrieved from their new website. KPN Plantation has a NDPE Policy in place: <a href="http://fapplantation.com/assets/Gama/Kelembagaan/KPN_Plantation_Sustainability_Policy.pdf">http://fapplantation.com/assets/Gama/Kelembagaan/KPN_Plantation_Sustainability_Policy.pdf</a>	Closed	29-Jun-20
17	Samuel International Group	Reports of deforestation in the following concessions: -PT Prasetya Mitra Muda Blok II	Mighty Earth Rapid Response Report 6	No direct or indirect connection between ADM and the parent company or mill.	Our supplier began an engagement process with parent company. According to this, Samuel Group has signed a letter of commitment in complying with the NDPE policy and currently exploring options for various assessment. In the meantime, our supplier continues to monitor PT Prasetya Mitra Muda Blok II's activities on monthly basis.	Closed	29-Jun-20
18	Tabung Haji Plantations (TH Plantations)	Reports of deforestation in the following concessions: -PT Persada Kencana Prima	Mighty Earth Rapid Response Report 5	Indirectly with parent company via third party suppliers/traders.	Our supplier began the engagement process with the company in 2018. Through our direct supplier's monitoring, it was detected land use change at PTP 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 to the re-planting of area now that planting is resuming. In the meantime, PTP continues to uphold their commitment to cease all activities on the ground. ADM is monitoring the progress through direct suppliers and public communications.	Closed	29-Jun-20
28	Jaya Tiasa Holding Berhad (Rimbanan Hijau Group)	Reports of deforestation in the following concessions: -LPP/0024	Mighty Earth Rapid Response Report 12	Indirect with parent company via third party suppliers/traders.	Rimbanan 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 Jaya Tiasa Holding Berhad (Rimbanan Hijau Group) LPP /0024 concerns Licensed Planted Forests which are designated for timber plantation such as acacia and not related to palm oil.	Closed	29-Jun-20
32	Global Palm Resources	Reports of deforestation in the following concessions: - PT Prasetya Tani Segati	Mighty Earth Rapid Response Report 14	Indirect via third party suppliers/traders	Our direct suppliers confirmed and concluded that the location of land clearing in the Mighty Earth report was not in the concession of PT Prakara Tani Segati ( <a href="http://bhty/zv4kR6A">http://bhty/zv4kR6A</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.	Closed	29-Jun-20
33	Genting Plantations Bhd	Reports of deforestation in the following concessions: - PT Cira Sawit Cemerlang	Mighty Earth Rapid Response Report 14, 15, 16, 17, 19, 23, 24	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that Genting commissioned Admentment to conduct the HCS assessment since June 2016. A working map shapefile was submitted to PT CSC in October 2017 after the assessment. It was clarified that the land clearing happened outside the identified HCS area. Admentment will submit the final HCS report for peer review, and in the meantime Stop work order is currently in place at PT CSC. Please see the link below: <a href="http://bhty/zv4kR6A">http://bhty/zv4kR6A</a> ADM is monitoring the progress through direct suppliers and public communications.	Closed	29-Jun-20
41	Ahmad Zaki Resources Berhad (AZRB Group) Malaysia	Reports of deforestation in the following concessions: - Ichtiar Gusti Pudi (425.97 ha)	Mongabay	Indirect via third party suppliers/traders.	After investigation our direct supplier confirms that deforestation has not occurred on the concession mentioned.	Closed	29-Jun-20
42	Ketapang Agro Lestari	Reports of deforestation in the following concessions: -PT Ketapang Hijau Lestari (990.7 ha)	Mongabay	Indirect via third party suppliers/traders	The company confirmed that they are not sourcing from concessions indicated to be carrying out forest clearing	Closed	29-Jun-20
43	KL-Kepong Plantation Holdings Sdn Bhd	Reports of deforestation in the following concessions: -PT Jabotans Eka Karsa (442.06 ha)	Mongabay	Indirect via third party suppliers/traders	After investigation our direct supplier confirm that deforestation has not occurred on the concession mentioned.	Closed	29-Jun-20
45	Saban Sawit Subur	Reports of deforestation in the following concessions: -Saban Sawit Subur (516.82 ha)	Mongabay	Indirect via third party suppliers/traders	According to the investigation of our direct supplier, land clearing is located outside of PT Saban Sawit Subur DSS's areas. The detected land clearing took place inside Sarawak Agro Estate, and PT 555 has no link to this company, and they are not suppliers to PT 555. PT 555 is covered under our supplier's existing monitoring programme and there is no known deforestation alert for PT 555 in 2020.	Closed	29-Jun-20
46	Genting Plantations Bhd	Reports of deforestation in the following concessions: -Sepanjang Indusurya Mula (649.47 ha)	Mongabay	Indirect via third party suppliers/traders	The area identified in the Mapbox report showing deforestation is not in the Sepanjang Intusurya Mula concession.	Closed	29-Jun-20
48	Kencana Agri Ltd	Reports of deforestation in the following concessions: -PT Agro Sawit Mas Lestari	Mighty Earth Rapid Response Report 17	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	Closed	29-Jun-20
52	Kirana Megatara	Reports of clearance prep/stacking lines in the following concessions: -PT Putera Katiragan Pratama	Mighty Earth Rapid Response Report 17	Indirectly with parent company via third party suppliers/traders.	Kirana Megatara is not ADM's supply chain since they are not palm related. Our direct supplier informed us that they reached out to Triputra Agro Perasada, who confirmed that Kirana Megatara is not a supplier to them.	Closed	29-Jun-20
53	Sumber Tani Agung	Reports of deforestation, clearance prep/stacking lines in the following concessions: - PT Tintahan Panduhup Asi	Mighty Earth Rapid Response Report 17	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved	Land clearing identified was proved to happen outside the concession	Closed	29-Jun-20
54	Boustead Plantation Bhd	Reports of clearance prep/stacking line in the following concessions: -Boustead Pelita Kanawit Snd Bhd	Mighty Earth Rapid Response Report 17	Indirectly via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	Closed	29-Jun-20
56	Yuwang/ Empresa (M) Sdn Bhd	Reports of deforestation in the following concessions: - Empresa (M) sdn bhd (07/0351)	Mighty Earth Rapid Response Report 17, 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession.	Closed	29-Jun-20
57	Rimbanan Hijau	Reports of peat development, clearance prep/stacking line in the following concessions: -Poh Zhen Sdn Bhd	Mighty Earth Rapid Response Report 17, 19, 20, 26, 29	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.	Closed	29-Jun-20
58	WTK	Reports of deforestation in the following concessions: -Southwind Plantation Sdn Bhd	Mighty Earth Rapid Response Report 17, 19	Indirectly via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that WTK was not involved in the land clearing. The clearance happened either outside their concession boundary or within "Native Dispute Land" inside their boundary. For clearance within "Native Dispute Land", we are engaging with WTK for more details on the nature of the dispute and the detail boundary of the disputed land.	Closed	29-Jun-20
59	Woodman Group	Reports of peat development in the following concessions: -Adong estate, part of LPP 004	Mighty Earth Rapid Response Report 17, 18, 21, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.	Closed	29-Jun-20

No.	Group	Issues	Reported by	Relationship	Progress	Status	Last Update
60	Woodman Group	Reports of peat development in the following concessions: - Liku estate, part of LPF 004	Mighty Earth Rapid Response Report 17, 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the operation / planting are not related to palm oil production. ADM therefore considers this case closed.	Closed	29-Jun-20
62	CB Industrial Product Holding/ Joloin Group	Reports of deforestation in the following concessions: - PT Kurun Sumber Rezeki	Mighty Earth Rapid Response Report 17	No direct or indirect connection between ADM and the parent company or mill.	Our supplier began the engagement process with the company that has a joint venture with CBP. There is no relationship between the company and PT Kurun Sumber Rezeki. CBP has no management control over the joint venture company.	Closed	29-Jun-20
64	Asian Agri (RGE)	Reports of peat forest development, clearance prep/stacking line in the following concessions: - PT Arlangga Sawit Jaya	Mighty Earth Rapid Response Report 17, 18, 20, 24, 26, 27	Indirect via third party suppliers/traders	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, and it happened outside their concession. Please see link for details: <a href="https://www.agriagroup.com/sustainability/review/asian-agg-2/">https://www.agriagroup.com/sustainability/review/asian-agg-2/</a>	Closed	29-Jun-20
67	KPN Group	Reports of deforestation in the following concessions: - PT Sumatera Unggul Makmur	Mighty Earth Rapid Response Report 18, 28	Indirectly with parent company via third party suppliers/traders.	GAMA Group has changed its name to KPN Plantation. This change came along with a restructured single legal entity for several plantations that are now all group member companies. KPN Plantation has NDPE Policy in place which now also incorporates PT SLM. <a href="http://kpnplantation.com/asset/uploads/indonesia/KPN_Plantation_Sustainability_Policy.pdf">http://kpnplantation.com/asset/uploads/indonesia/KPN_Plantation_Sustainability_Policy.pdf</a>	Closed	29-Jun-20
68	Golden Plantation Tbk	Reports of deforestation in the following concessions: - PT Arlangga Sawit Jaya	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	For a list of KPN Plantation Group member companies please see below: We were informed from one supplier that the land clearing location mentioned by Mighty Earth was outside PT ASI SLDK.	Closed	29-Jun-20
69	KLK Bhd (Kuala Lumpur Kepong Bhd)	Reports of peat development in the following concessions: - PT Menteng Jaya Sawit Perdana	Mighty Earth Rapid Response Report 18, 19, 21	Indirect with parent company via third party suppliers/traders.	KIK Geoinformasi List no.055 shows that the alleged area is located within PT MSP's permit area (Bim Likas). It is however no longer within the management control of PT MSP, as in 2016 the area has been gazetted by Kementerian Lingkungan Hidup & Kehutanan ("KLH") as Community Forest Plantation [Kawasan Rakyat ("HR") area.	Closed	29-Jun-20
73	Rimbunan Hijau	Reports of peat development in the following concessions: - Woodjaya Sdn Bhd (Lot 197)	Mighty Earth Rapid Response Report 18, 26, 27	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing was conducted by communities for planting of pineapple.	Closed	29-Jun-20
75	TH Plantations Bhd (Tabung Hill)	Reports of peat development in the following concessions: - TH Pelata Meludam Sdn Bhd	Mighty Earth Rapid Response Report 18	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the land clearing was not conducted by TH Pelata Meludam Sdn Bhd. It happened outside of their concession.	Closed	29-Jun-20
76	Tradewinds	Reports of peat forest development in the following concessions: - Trans Kenyalang Sdn Bhd	Mighty Earth Rapid Response Report 18, 19, 26	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our supplier informed us that the location of land clearing mentioned by Mighty Earth 18 was located outside their concession.	Closed	29-Jun-20
77	Woodman Group	Reports of deforestation and peat development in the following concessions: - Baram Estate (Part of LPF/0004)	Mighty Earth Rapid Response Report 18, 21, 27	Indirect with parent company via third party suppliers/traders.	We were informed that the concession is not related to palm of production and the area is not within Woodman's concession.	Closed	29-Jun-20
84	Lyman Agro Group	Reports of deforestation in the following concessions: - PT Bonti Permai Jayaraya	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that BPI was not involved in any land clearing and the land clearing mentioned by Mighty Earth 19 was located outside their concession.	Closed	29-Jun-20
85	Goodhope Group	Reports of deforestation in the following concessions: - PT Sumber Hasil Prima	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that both the satellite imagery interpretation and field verification (ground tracing) demonstrate that the land clearing of the particular spots reported in the Mighty Earth Rapid Response 19 were taking place in areas owned by local community located outside the concessions of PT SHP.	Closed	29-Jun-20
86	Samuel International Group	Reports of clearance prep/stacking lines in the following concessions: - PT Bina Sarana Sawit Utama	Mighty Earth Rapid Response Report 19, 20, 24, 26, 27	Indirectly via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that based on their overlay map, the location of land clearing mentioned by Mighty Earth 19 was located more than 70 km away outside BSGU concession. Please see the below link: <a href="http://bit.ly/2hqi-5m">http://bit.ly/2hqi-5m</a>	Closed	29-Jun-20
90	Alambumi Group	Reports of deforestation in the following concessions: - Alambumi Sdn Bhd	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to Alambumi Sdn Bhd.	Closed	29-Jun-20
91	Rimbunan Hijau Group	Reports of clearance prep/stacking lines in the following concessions: - RH Plantation (Selangor Estate)	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the clearing is non-palm related. ADM therefore considers this case closed.	Closed	29-Jun-20
92	Sime Darby Group	Reports of deforestation in the following concessions: - Sime Darby Plantation Sdn Bhd	Mighty Earth Rapid Response Report 19	Indirectly with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the location of land clearing mentioned by Mighty Earth 19 was just outside Derawan SOU 33 concession.	Closed	29-Jun-20
94	Dharma Satya Nusantara (DSN Group)	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 1)	Mighty Earth Rapid Response Report 20, 23, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadalatral map. RSPO has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.	Closed	29-Jun-20
95	Dharma Satya Nusantara (DSN Group)	Reports of deforestation in the following concessions: - PT Putra Utama Lestari (area 2)	Mighty Earth Rapid Response Report 20, 23, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that all land clearing locations are outside PT PUL Kadalatral map. RSPO has published revised boundaries of PT PUL. The issue regarding the concession boundaries has been resolved and accepted by Mighty Earth.	Closed	29-Jun-20
96	IJM Group	Reports of deforestation in the following concessions: - PT Prima Bahagia Permai	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that IJM has confirmed that the land clearing areas are NOT located within the RMP's concession boundary.	Closed	29-Jun-20
97	STH Group (Sin Tek Huat)	Reports of deforestation in the following concessions: - PT Makmur Bersama Asia	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Makmur Bersama Asia's concession boundary.	Closed	29-Jun-20
98	Felda Global Ventures	Reports of deforestation in the following concessions: - PT Citra Niaga Perkasa	Mighty Earth Rapid Response Report 20	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier informed us that the alleged deforestation area belongs to the local community who did not give consent to FGV for land development even though the land is within FGV's "tan laka" boundary. It is understood that the land clearing activities started since Jun'19 for paddy planting purpose. Both PT ODP and PT TAA operation in FGV Kalimantan involve only maintenance of road, drains and boundary trenches and water table.	Closed	29-Jun-20
118	Dhanistha Surya Nusantara	Reports of deforestation in the following concessions: - PT Sabhantara Rawi Sentosa	Mighty Earth Rapid Response Report 21, 23, 26, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Sabhantara Rawi Sentosa's concession boundary.	Closed	29-Jun-20
120	Global Enterprise Sdn Bhd	Reports of deforestation in the following concessions: - PT Bulunga Surya Pratama	Mighty Earth Rapid Response Report 21, 27	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question is outside of PT Bulunga Surya Pratama's concession boundary.	Closed	29-Jun-20
121	Golden Plantation Tbk	Reports of deforestation, peat forest development and clearance prep/stacking lines in the following concessions: - PT Mitra Jaya Agro Palm	Mighty Earth Rapid Response Report 21	Indirect via third party suppliers/traders.	ADM reached out to direct supplier for investigation. We were informed that the land clearing spots were located outside PT MMAP concession.	Closed	29-Jun-20
124	Teladan	Reports of deforestation in the following concessions: - PT Teladan Palma Perkasa	Mighty Earth Rapid Response Report 21	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question does not belong to the Teladan Group as their concession permit expired 2 years ago and no activities were ever undertaken.	Closed	29-Jun-20
127	Rimbunan Hijau	Reports of deforestation in the following concessions: - Timvest Sdn Bhd	Mighty Earth Rapid Response Report 21, 27, 28	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that area in question was not cleared by the company and is outside of Timvest Sdn Bhd's concession boundary.	Closed	29-Jun-20
130	Agro Sarimas Group	Reports of deforestation in the following concessions: - PT Agro Sarimas Indonesia	Mighty Earth Rapid Response Report 22	Indirect with parent company via third party suppliers/traders.	ADM reached out to direct supplier for investigation. Our direct supplier confirmed that the concession is not involved in the land clearing, it was a fire incident, and it happened outside of their concession. Please see the below links: PT ASI's response: <a href="http://bit.ly/2PFIuk7">http://bit.ly/2PFIuk7</a> Duality map: <a href="http://bit.ly/2YICd8E">http://bit.ly/2YICd8E</a>	Closed	29-Jun-20

